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# All Main Modifications

**Genway, Tom**

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**From:** Clive Bagshaw [REDACTED]  
**Sent:** 28 June 2019 09:52  
**To:** Policy  
**Subject:** BROXTOWE PART 2 LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION

Dear Sir or Madam,

I have read through the documents concerning the Broxtowe Part 2 Local Plan: Main modifications consultation and I find the modifications very sensible and practical. I therefore have no objections or adverse comments to make. Clearly there has been a tremendous amount of work put into this and it is very thorough and extensive. I commend those involved.

Yours faithfully,

Clive R Bagshaw

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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<https://www.avast.com/antivirus>

**Genway, Tom**

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**From:** Town Planning [REDACTED]  
**Sent:** 21 June 2019 16:01  
**To:** Policy  
**Subject:** RE: BROXTOWE PART 2 LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION

Dear Sir/Madam,

Thank you for consulting HS2 Ltd. I can confirm that we have no comments regarding the proposed main modifications.

Kind regards

**Peter Attwell | Town Planning Advisor | Infrastructure Directorate | HS2 Ltd**

[REDACTED]

High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | [www.gov.uk/hs2](http://www.gov.uk/hs2)

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**From:** Genway, Tom [mailto:[REDACTED]] **On Behalf Of** Policy  
**Sent:** 24 May 2019 10:35  
**To:** Town Planning [REDACTED]  
**Subject:** BROXTOWE PART 2 LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION

Dear Sir/Madam

## **PART 2 LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION**

Broxtowe's Part 2 Local Plan was submitted for examination in August 2018. The examination process is being carried out by Helen Hockenhull who is an independent Planning Inspector. The Inspector will determine whether the Plan is 'sound' and complies with legal requirements.

You have received this letter because you have made comments on the Part 2 Local Plan at an earlier stage during its preparation, you are a consultee, or have requested to be notified. Please let us know if you no longer wish to be kept informed.

Following the completion of the public hearings, the Plan has reached the next key stage in the process. The Inspector has now asked that consultation be carried out on the Main Modifications which may be necessary to make the Plan 'sound' and / or legally compliant.

Broxtowe Borough Council is inviting your comments on the Main Modifications to the Part 2 Local Plan and these can be made between **Friday 24<sup>th</sup> May 2019** and **5pm on Tuesday 9<sup>th</sup> July 2019**. **Responses should be limited to the Main Modifications documents.** Details of the consultation documents and how to respond can be found overleaf, comments relating to other issues will not be considered by the Inspector.

There are also some Additional Modifications, which are minor changes to update the Local Plan and are included for information only. After the Consultation, the Inspector will consider all comments on the Main Modifications before issuing her Report on whether she considers the Local Plan sound and / or legally compliant.

If you have any queries, please do not hesitate to contact the Planning Policy team.

Yours faithfully



Steffan Saunders  
Head of Neighbourhoods & Prosperity

**Broxtowe Borough Council Part 2 Local Plan**  
**Notice of public consultation on Main Modifications**  
**Town and Country Planning (Local Planning) (England) Regulations 2012**

The Council is seeking comments on the Main Modifications to the Broxtowe Borough Part 2 Local Plan. The Main Modifications are those that the Inspector has identified as possibly being necessary in order for the Plan to be found 'sound'. The Inspector's final conclusions will be given in her Report in due course.

Consultation on the Main Modifications and the associated Sustainability Appraisal of the Main Modifications will run from **Friday 24<sup>th</sup> May 2019 until 5pm on Tuesday 9<sup>th</sup> July 2019**. Comments must be received within this time, representations received after this date and time will not be accepted.

**At this stage representations are only being sought on whether the Main Modifications to the Plan are sound and/or legally compliant.**

**If a response was made to the previous Part 2 Local Plan consultations, there is no need to resubmit them during this representation period as the Inspector has already considered these representations during the course of the Examination.**

Representations are invited on the following documents:

- . Schedule of Main Modifications;
- . Main Modifications Sustainability Appraisal and Habitats Regulation Assessment update; and
- . Schedule of Changes to the Policies Map.

Representations can be made:

- . online via [www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)
- . by email to [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)
- . by post to Planning Policy, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham NG9 1AB

Documents are available for inspection on our website: [www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan) and at the following locations:

- . The Council's Main Offices at: Foster Avenue, Beeston, NG9 1AB (Mon-Thursday 08:30-17:00 & Friday 8.30 – 16.30);
- . Beeston Library, Foster Avenue, Beeston, Nottingham NG9 1AE (0115 925 5168);
- . Chilwell (Inham Nook) Library, Barn Croft, Chilwell, Nottingham NG9 4HU (0115 804 4363);
- . Eastwood Library, Wellington Place, Eastwood, Nottingham NG16 3GB (01773 712209);
- . Kimberley Library, Main Street, Kimberley, Nottingham NG16 2LY (0115 804 4363);
- . Stapleford Library, Church Street, Stapleford, Nottingham NG9 8GA (0115 939 9178);
- . Toton Library, Stapleford Lane, Toton, Nottingham NG9 6GA (0115 804 4363).

Opening times for the libraries can be found online at: [www.inspireculture.org.uk/reading-information/](http://www.inspireculture.org.uk/reading-information/)

Should you have any queries relating to this consultation, you can contact the Planning Policy team on 0115 917 3452 or email [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

Large print copies of this notice are available on request.

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# Details

Agent (if applicable)

Please provide your client's name	██████████
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Your details

Title	Miss
Name	R
Organisation	N/A
Address	Withheld
Post code	██████████
Tel. Number	
E-mail address	████████████████████

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	No
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Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	all
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	

Planning Policy  
Broxtowe Borough Council  
Council Offices  
Foster Avenue  
Beeston  
Nottingham  
NG9 1AB

Lucy Bartley  
Consultant Town Planner

[REDACTED]  
[REDACTED]

Sent by email to:  
[policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

01 July 2019

Dear Sir / Madam

**Broxtowe Borough Council: Local Plan Part 2: Main Modifications Consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Lucy Bartley  
Consultant Town Planner

Spencer Jefferies  
Development Liaison Officer, National Grid

[REDACTED]

[REDACTED]

Wood E&I Solutions UK Ltd

National Grid House

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Nicholls House

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Wood Environment  
& Infrastructure Solutions UK Limited  
Registered office:  
Booths Park, Chelford Road, Knutsford,  
Cheshire WA16 8QZ  
Registered in England.  
No. 2190074



Yours faithfully

[via email]

**Lucy Bartley**  
**Consultant Town Planner**

cc. Spencer Jefferies, National Grid

# Main Modifications 1

21 June 2019

Our ref: Broxtowe 8

Dear Sir/Madam

## Broxtowe Local Plan part 2 Main Modifications

Thank you for the opportunity to comment on your consultation.

In relation to the Modifications to:

Policy 1: Flood Risk Severn Trent are supportive of the including a reference to Sustainable Drainage Systems, due to the need to manage surface water in a sustainable way ensuring that flood risk downstream is not increased.

We would however also advise that a reference to the Drainage Hierarchy (paragraph 80 of Planning Practice Guidance) as this approach also support the sustainable management for surface water by ensuring that water is returned to the natural water cycle, reducing the risk of flooding.

In relation to bullet point C ii we would not recommend setting minimum brownfield improvement % as the non-Statutory Technical Standards for sustainable Drainage state

*“For developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event.”*

By setting a minimum betterment additional achievable reductions beyond 30% are likely to be missed.

Green Infrastructure is mentioned specifically within a number of policies including Policy 4.1: Land West of Awsworth, this policy includes the bullet point:

*“retain hedgerows and incorporate these into any landscape scheme”*

Severn Trent are supportive of the protection of existing biodiversity assets such as Trees and hedgerows, but would also recommend that watercourses are included within this section to ensure that Ditches, land drains and watercourses are not lost through development. These assets provide vital links to the sustainable management of surface water and can also be utilised to develop Blue-Green corridors that will enhance biodiversity and amenity within development, provided that they are protected and retained within open spaces.

Severn Trent are supportive of references to SuDS being utilised within site specific policies such as policy 5.1: East of Church lane, Brinsley, however we would recommend that this approach to reference SuDS within each of the site specific policies is utilised to highlight that all sites are required to incorporate SuDS.

Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you.

### **Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

### **Sewage Strategy**

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

### **Surface Water and Sewer Flooding**

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

### **Water Quality**

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals

should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

### Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

### Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Chris Bramley

Strategic Catchment Planner

[Redacted signature]

# Main Modifications 2



# Part 2 Local Plan Main Modifications Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name	Bloor Homes Ltd
-----------------------------------	-----------------

## Your Details

Title	Mr Mrs Miss Ms Other: Mr
Name	Ben Holmes
Organisation (if responding on behalf of an organisation)	Oxalis Planning Ltd
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

**By submitting this response form you are agreeing to these conditions.**

## Please return completed forms to:

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM 

2 and 19
----------

  
(Please see consultation document)

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Support ☐

Object ☒

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**BROXTOWE BOROUGH COUNCIL**  
**Local Plan Part 2:**  
**MAIN MODIFICATION 2 and 19.**

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Representations on behalf of  
BLOOR HOMES

July 2019

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## **Contents**

- 1.0      Introduction.**
- 2.0      Representation to Main Modifications: 2 and 19.**

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## **1.0 Introduction**

- 1.1 These representations have been prepared on behalf of Bloor Homes who have a number of land interests in Broxtowe. We have previously made representations to Broxtowe for many years on behalf of Bloor Homes during both the development of the Greater Nottingham Aligned Core Strategies (ACS) and earlier consultation stages of the Broxtowe Local Plan Part 2 (LPP2).
- 1.2 Bloor Homes have serious concerns about the soundness of LPP2, particularly in relation to the approach to housing and the allocation at Toton, and object to the modifications set out. Details of their concerns in respect of housing delivery are set out in these representations. These representations also outline modifications to LPP2 which are considered necessary to make it sound.

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## 2.0 Main Modifications 2 and 19:

### MM2: Changes to the Housing Figures in Table 3 (Policy 2: Site Allocations)

### MM19: Changes to the Housing Trajectory in Table 5

- 2.1 We welcome the Council's approach to increase the housing numbers in the Main Built Up Area, as shown in Table 3, but consider that the proposed supply of sites within the Plan period (2011-28) is not realistic and will therefore not deliver the 6,150 homes required by the ACS. As set out below, we have significant concerns relating to the delivery of the strategic sites and we consider that unless the LPP2 allocates more land and sites within the Plan, LPP2 is not positively prepared, justified, effective or consistent with national policy in accordance with the 2012 National Planning Policy Framework (NPPF), and is therefore not sound.
- 2.2 As previously detailed in our representations to Matters 4, 6, 8 and 9 in November 2018, we consider that the projected completion rates which underline Tables 3 and 5 are unrealistic. The Council are proposing an approach which relies on the delivery of all the large and complex sites with little or no room for further delay, let alone non-delivery of one or more sites. It should be noted that many of these sites have been allocated since 2004 which demonstrates how challenging they are to deliver. Accordingly, the draft LPP2 is unsound as the Council are unable to demonstrate a sufficient number of deliverable sites to meet the ACS requirement.
- 2.3 In particular, there are significant concerns as to the deliverability of the Peveril Homes scheme at Toton (refs. 12/00585/OUT and 17/00499/REM) due to its contrast with competing ambitions for the Toton Strategic Location for Growth allocation. These competing ambitions include proposals detailed in a masterplanning document in September 2017 by the East Midlands Councils (EMC) with endorsement by the D2N2 LEP, the Leicestershire and Leicester LEP, the East Midlands Chamber and the Rail Forum. This document built upon a September 2016 'Emerging Growth Strategy' which set out a vision for maximising the 'economic prize' created by HS2. A further masterplanning document was also produced by EMC in October 2017. Although all these documents promote land at Toton for a mixed-use development they differ in their approach when compared with Policy 3.2 and the Peveril scheme. As the Toton allocation proposes 350 homes within the first 5 years of the Plan period, any reduction in delivery caused by a change in approach to the development of the site would impact on the 5-year supply of the Borough.
- 2.4 We also have significant concerns relating to the Chetwynd Barracks allocation which proposed a highly unrealistic timetable for the delivery of 500 homes within the Plan period. We raised concerns about this in our representations to Matter 6 in November 2018 and there is no evidence to suggest progress has been made since.
- 2.5 Table 5 demonstrates that housing delivery has been poor since the start of the Plan period in 2011/12 and has resulted in the Council being 856 homes short of their cumulative requirement up to 2017/18. The draft LPP2 proposes a stepped trajectory with delivery anticipated to be much higher during the latter half of the Plan period when compared with earlier years. Indeed, over the first 7 years of the Plan, 2011/12 – 2017/18, 1,144 homes were delivered with a peak of 324 homes in 2017/18, however, over the next 7 year period, 2018/19 – 2024/25, the anticipated delivery is 4,706 homes with peaks of over 1,000 homes each year in 2020/21 and 2021/22. Whilst the adoption of LPP2 might be expected to kick-start some additional house building during the few years following adoption, it is wholly unrealistic to expect a more than six-fold increase in delivery based on the Plan as currently

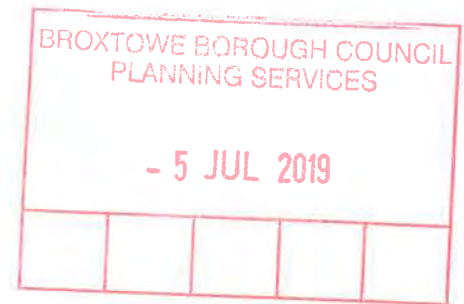


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prepared. Without a greater number of sites which can provide greater 'outlets' and better certainty of delivery, the Plan will not provide the basis for the housing requirements of the Borough to be met.

- 2.6 In the Post Hearing Advice Note, dated 15 March 2019, concerns are raised about the 5-year housing supply of the Borough and the Note details that with changes to the windfall allowance, the Council would only have a 5.2-year supply with a surplus of 150 dwellings. For the reasons we have set out above we do not consider that the land supply position set out in LPP2 is realistic. Notwithstanding it is our view that a 5.2-year supply at the adoption of the Plan, particularly in the light of the challenges to delivery in the Borough, does not provide a sound basis from which delivery can be secured. Indeed, at this level it is inevitable that the Council would quickly be unable to demonstrate a 5-year supply of deliverable sites as required by the NPPF and the Plan would become 'out-of-date'.
- 2.7 In conclusion, unless the Council include more land within the Toton allocation to assist with the delivery of the site and, allocate more sites across the Borough for delivery within the Plan period, LPP2 as set out will not be sound in accordance with paragraph 182 of the 2012 NPPF.

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Planning policy  
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**BY EMAIL – [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)**

4<sup>th</sup> July 2019

Dear Sir / Madam

**RE: BROXTOWE PART 2 LOCAL PLAN – MAIN MODIFICATIONS  
OBJECTION TO MODIFICATIONS MM2 and MM4**

Spawforths have been participants within the Broxtowe Part 2 Local Plan Examination on behalf of Harworth. We appeared at the Examination in respect of Matters 2 and 7 to address employment issues and Toton Strategic Location for Growth. We have completed the Proposed Main Modifications Form and attached this letter as the explanation of our **OBJECTIONS TO MAIN MODIFICATIONS MM2 and MM4**.

**MM2 - Employment Requirements**

The Inspector's Post Hearing Advice Note dated 15<sup>th</sup> March 2019 indicated in paragraph 5 that the Core Strategy requirement "*of a minimum of 15 hectares of land for new and relocated industrial and warehousing uses will be met. However it is unclear from the wording of the LPP2 how this is to be achieved*". Main Modification 2 (MM2) in paragraph 2.9 seeks to set this out to meet the Inspectors requirements. Spawforths gave detailed evidence on the suitability of the various sources of employment supply set out in the LPP2 and we came to the conclusion that these sources of supply resulted in a shortfall of 11.9ha against the minimum industrial and warehousing requirement. No new sources have been identified but the Main Modifications (MM3 and MM4) seek to clarify the position with regard to Chetwynd Barracks and Toton. MM2 indicates that one source of industrial and warehousing supply is "*employment development as part of mixed-use development at Chetwynd Barracks (Policy 3.1)*". In fact MM3 in respect of Chetwynd Barracks sets

Spawforths

out a capacity for 1500 homes (increased from 800+); Green Infrastructure, Open Space and Sports Pitches; a new Primary School and Medical Centre; small retail / service centre; and “*small scale employment development*”. Paragraph 3.15 confirms that this is for B1 Office Use and hence this is not a relevant source of supply for industrial and warehousing uses. MM2 indicates that a further source of industrial and warehousing supply is “*the Toton Strategic Location for Growth (policy 3.2)*”. MM4 confirms that this “*will include a minimum provision of 18,000 square meters of B Class employment floor space*”. It reconfirms that this employment element is expected to be attractive to the market “*in the later years of the plan period and quite possibly beyond 2028..*”, even though in the “*Key Requirements*” element of the policy this is contradicted as it notes “*a minimum of 18,000 square meters for mixed employment (B Use Classes) to support realisation of an Innovation Campus*” is to come forward within the Plan period. MM4 therefore provides no additional confirmation that “*industrial and warehousing*” will be provided at Toton as it still refers to an “*Innovation Campus*” and also to this coming forward beyond the Plan period. Indeed under point xix of the policy, reference is made to “*iconic tall buildings*” which are clearly not appropriate forms of development for industrial and warehousing and rather reconfirm that the “*Innovation Campus*” is a B1 Office aspiration and not an industrial and warehousing scheme.

MM2 therefore provides no further justification which overcomes the shortfall in the minimum industrial and warehousing provision and hence the amendments within MM2 fail the NPPF tests of “*soundness*” in that they are not “*justified*” nor are they “*positively prepared*” as they will not meet the development needs of the Aligned Core Strategy. They are therefore “*not consistent with national policy*”.

#### **MM4 – Toton Strategic Location for Growth**

For the reasons set out above, the Toton Strategic Location for Growth policy amendments are internally inconsistent and are not justified. Harworth **object** to the following elements of MM4:-

- The inconsistency within the Policy of when the “*Innovation Campus*” is to be brought forward. Harworth consider that it will only come forward after the Plan period when the “*Station is operational*” and hence that the employment delivery within this site cannot be counted towards the aligned Core Strategy minimum requirements.
- The Policy should be clarified to confirm what types of uses are expected within the “*Innovation Campus*”. The Masterplan requirements set out in the policy need to be capable of being realised. Harworth consider that what is expected within the Toton Strategic Location for Growth is “*iconic tall buildings*” to benefit from the new economic outlook provided by the HS2 station. Such buildings must therefore be of a B1 (Office) nature. There is no evidence that this is a suitable location for “*industrial and warehousing*” nor that such uses are compatible with the location,

proposed mix of uses, or nature of the environment to be created. Harworth consider that the Toton site will not contribute to the minimum requirement of 15 hectares of industrial and warehousing land requirement.

Harworth also **conditionally object** to point xxii of the policy:-

- Harworth **support** the recognition that some existing uses will need to be relocated to "appropriate relocation sites" but Harworth consider that the LPP2 would be more "effective" if the wording were clarified as follows:

*"Relocate all displaced uses including the plant nursery, electricity substation, sewage works and Network Rail / DB Schenker off site subject to the viability of such proposals and appropriate relocation sites being identified and secured. Such relocation sites should meet the user requirements, for example in respect of rail connections, and should also seek to be provided in as close proximity to the current users as possible to retain the workforce and skill base within Broxtowe".*

#### **Changes to secure a "Sound" LLP**

In line with our Participant Statements to Matters 2 and 7 we consider that the minimum industrial and warehousing shortfall required by the Aligned Core Strategy should be made up through new site allocations. We recognise that the need for new allocations would have to be requested by the Inspectors in their final conclusions. We also recognise that the Council would then need to consider suitable sites against the LPP2 policies and a Sustainability Assessment and put forward further Modifications with regard to the chosen site(s). We consider that this process is necessary in order to address the current "soundness" issues.

This process is particularly important to ensure that the displaced rail related uses set out within the Toton Strategic Location for Growth (MM4) can be relocated. A "candidate" site to meet this requirement is that which is owned by Harworth at Bennerley. The Council's Local Plan Actions (M2A2, 3, 5 and 6) indicate that the Bennerley site has been the subject of Sustainability Appraisal, although I have raised my reservations about their conclusions. Since however it has been the subject of Sustainability Appraisal, this site can be considered by the Inspector as a suitable site allocation to overcome these concerns of "soundness".

If the Inspector considers that such a further round of modifications cannot be justified then it is recommended that the Inspector specifically requests a further change to the LPP2 to insert a

**requirement for an early review** of the Broxtowe LPP to address the employment land shortfall and to address the Toton displaced user requirements.

### **Conclusion**

The LPP2 does not achieve a minimum of 15 ha of industrial and warehousing land and as the requirement is a minimum, then the shortfall should be made up through new allocations as part of a further round of analysis by the Council and through a further set of Main Modifications. "Candidate" sites should be reassessed in this current context including the need to meet the displaced uses from the Toton Strategic Location for Growth. Harworth's site at Bennerley should be assessed in detail to overcome these "soundness" issues. Alternatively it is recommended that the Inspector specifically requests a further change to insert a **requirement for an early review** of the Broxtowe LPP to address the employment land shortfall and to address the Toton displaced user requirements.

Please do not hesitate to contact me should you require any clarification.

 Yours faithfully  


David Rolinson

Chairman

BA (Hons), DiP PEL, MRTPI  


Encs:  


File Ref: P0-TP-SPA-LT-P4238-0002-A

# Part 2 Local Plan Main Modifications Consultation Response Form



Agent (if applicable)

Please provide your client's name **HARWORTH**

## Your Details

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Name	<b>ROLINSON</b>
Organisation (if responding on behalf of an organisation)	<b>SPAWFORTH'S</b>
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**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

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MM

2

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

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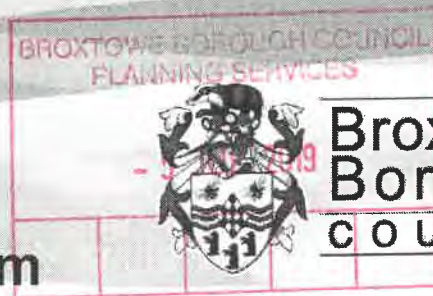
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The Inspector's Post Hearing Advice Note dated 15<sup>th</sup> March 2019 indicated in paragraph 5 that the Core Strategy requirement "*of a minimum of 15 hectares of land for new and relocated industrial and warehousing uses will be met. However it is unclear from the wording of the LPP2 how this is to be achieved*". Main Modification 2 (MM2) in paragraph 2.9 seeks to set this out to meet the Inspectors requirements. Spawforths gave detailed evidence on the suitability of the various sources of employment supply set out in the LPP2 and we came to the conclusion that these sources of supply resulted in a shortfall of 11.9ha against the minimum industrial and warehousing requirement. No new sources have been identified but the Main Modifications (MM3 and MM4) seek to clarify the position with regard to Chetwynd Barracks and Toton. MM2 indicates that one source of industrial and warehousing supply is "*employment development as part of mixed-use development at Chetwynd Barracks (Policy 3.1)*". In fact MM3 in respect of Chetwynd Barracks sets

Spawforths

out a capacity for 1500 homes (increased from 800+); Green Infrastructure, Open Space and Sports Pitches; a new Primary School and Medical Centre; small retail / service centre; and “small scale employment development”. Paragraph 3.15 confirms that this is for B1 Office Use and hence this is not a relevant source of supply for industrial and warehousing uses. MM2 indicates that a further source of industrial and warehousing supply is “the Toton Strategic Location for Growth (policy 3.2)”. MM4 confirms that this “will include a minimum provision of 18,000 square meters of B Class employment floor space”. It reconfirms that this employment element is expected to be attractive to the market “in the later years of the plan period and quite possibly beyond 2028..”, even though in the “Key Requirements” element of the policy this is contradicted as it notes “a minimum of 18,000 square meters for mixed employment (B Use Classes) to support realisation of an Innovation Campus” is to come forward within the Plan period. MM4 therefore provides no additional confirmation that “industrial and warehousing” will be provided at Toton as it still refers to an “Innovation Campus” and also to this coming forward beyond the Plan period. Indeed under point xix of the policy, reference is made to “iconic tall buildings” which are clearly not appropriate forms of development for industrial and warehousing and rather reconfirm that the “Innovation Campus” is a B1 Office aspiration and not an industrial and warehousing scheme.

MM2 therefore provides no further justification which overcomes the shortfall in the minimum industrial and warehousing provision and hence the amendments within MM2 fail the NPPF tests of “soundness” in that they are not “justified” nor are they “positively prepared” as they will not meet the development needs of the Aligned Core Strategy. They are therefore “not consistent with national policy”.

#### **MM4 – Toton Strategic Location for Growth**

For the reasons set out above, the Toton Strategic Location for Growth policy amendments are internally inconsistent and are not justified. Harworth object to the following elements of MM4:-

- The inconsistency within the Policy of when the “Innovation Campus” is to be brought forward. Harworth consider that it will only come forward after the Plan period when the “Station is operational” and hence that the employment delivery within this site cannot be counted towards the aligned Core Strategy minimum requirements.
- The Policy should be clarified to confirm what types of uses are expected within the “Innovation Campus”. The Masterplan requirements set out in the policy need to be capable of being realised. Harworth consider that what is expected within the Toton Strategic Location for Growth is “iconic tall buildings” to benefit from the new economic outlook provided by the HS2 station. Such buildings must therefore be of a B1 (Office) nature. There is no evidence that this is a suitable location for “industrial and warehousing” nor that such uses are compatible with the location,

proposed mix of uses, or nature of the environment to be created. Harworth consider that the Toton site will not contribute to the minimum requirement of 15 hectares of industrial and warehousing land requirement.

Harworth also **conditionally object** to point xxii of the policy:-

- Harworth **support** the recognition that some existing uses will need to be relocated to "appropriate relocation sites" but Harworth consider that the LPP2 would be more "effective" if the wording were clarified as follows:

*"Relocate all displaced uses including the plant nursery, electricity substation, sewage works and Network Rail / DB Schenker off site subject to the viability of such proposals and appropriate relocation sites being identified and secured. Such relocation sites should meet the user requirements, for example in respect of rail connections, and should also seek to be provided in as close proximity to the current users as possible to retain the workforce and skill base within Broxtowe".*

#### **Changes to secure a "Sound" LLP**

In line with our Participant Statements to Matters 2 and 7 we consider that the minimum industrial and warehousing shortfall required by the Aligned Core Strategy should be made up through new site allocations. We recognise that the need for new allocations would have to be requested by the Inspectors in their final conclusions. We also recognise that the Council would then need to consider suitable sites against the LPP2 policies and a Sustainability Assessment and put forward further Modifications with regard to the chosen site(s). We consider that this process is necessary in order to address the current "soundness" issues.

This process is particularly important to ensure that the displaced rail related uses set out within the Toton Strategic Location for Growth (MM4) can be relocated. A "candidate" site to meet this requirement is that which is owned by Harworth at Bennerley. The Council's Local Plan Actions (M2A2, 3, 5 and 6) indicate that the Bennerley site has been the subject of Sustainability Appraisal, although I have raised my reservations about their conclusions. Since however it has been the subject of Sustainability Appraisal, this site can be considered by the Inspector as a suitable site allocation to overcome these concerns of "soundness".

If the Inspector considers that such a further round of modifications cannot be justified then it is recommended that the Inspector specifically requests a further change to the LPP2 to insert a



**requirement for an early review** of the Broxtowe LPP to address the employment land shortfall and to address the Toton displaced user requirements.

### **Conclusion**

The LPP2 does not achieve a minimum of 15 ha of industrial and warehousing land and as the requirement is a minimum, then the shortfall should be made up through new allocations as part of a further round of analysis by the Council and through a further set of Main Modifications. "Candidate" sites should be reassessed in this current context including the need to meet the displaced uses from the Toton Strategic Location for Growth. Harworth's site at Bennerley should be assessed in detail to overcome these "soundness" issues. Alternatively it is recommended that the Inspector specifically requests a further change to insert a **requirement for an early review** of the Broxtowe LPP to address the employment land shortfall and to address the Toton displaced user requirements.

Please do not hesitate to contact me should you require any clarification.

  
Yours faithfully

David Rolinson  
Chairman  
BA (Hons), DiP PEL, MRTPI

  
  
Encs:

  
  
File Ref: P0-TP-SPA-LT-P4238-0002-A

# Main Modifications 3

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	Not applicable
-----------------------------------	----------------

## Your Details

Title	Mr Mrs Miss Ms Other:
Name	Graham Heal
Organisation (if responding on behalf of an organisation)	Chetwynd: The Toton and Chilwell Neighbourhood Forum
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

**Yes**

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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For more information including an **online response** form please visit:

**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

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**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

**3. Policy 3.1**

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

**Yes**

Object

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)  
If you wish to comment on more than one Modification, please use a separate form for each.

1. The modification fully represents the Forum's views regarding this Policy – not least the need to ensure:
  - That the Barracks must be treated as one entity and that a comprehensive and cohesive development is achieved
  - That an overarching Strategic masterplan is created covering the whole site
  - This masterplan needs to be mindful of, and conform to, the masterplan developed for the Strategic Location for Growth – see Policy 3.2
  - The Forum must be engaged in providing input to the development of the masterplan
2. Other additions made to this Policy (such as the retention of Hobgoblin Wood and the need to create attractive links between open spaces) are also fully supported.
3. Overall, we believe this Policy is much stronger and we are very pleased with the changes made.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

**4. Policy 3.2**

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

**Yes**

Object

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

5. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)  
If you wish to comment on more than one Modification, please use a separate form for each.

1. The modification represents the Forum's views regarding this Policy, in particular:
  - The provision of multi-functional green infrastructure corridor to the south of the area
  - That the road infrastructure must take into account the requirements for road access to Chetwynd Barracks
  - That a Strategic masterplan needs to be prepared and include the development expected to be delivered after 2028
  - The Forum must be engaged in providing input to the development of the masterplan
2. Overall, we believe this Policy is stronger and we are pleased with the changes made.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

34. Policy 26

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

Yes

Object

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

6. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)  
If you wish to comment on more than one Modification, please use a separate form for each.

1. The modification fully represents the Forum's views regarding this Policy especially the additional text to para 26.1 that travel plans need to provide details how developments will encourage non-car use though more walking, cycling and use of public transport.
2. Overall, we believe this Policy is much stronger and we are pleased with the changes made.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input checked="" type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

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*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

3

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM3 - policy 3.1 Chetwynd Barracks

HE Supports the additional information in respect of designated and non-designated heritage assets.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<del>Mr</del> <del>Mrs</del> Miss <del>Ms</del> Other:
Name	ROSAMUND WORRALL
Organisation (If responding on behalf of an organisation)	HISTORIC ENGLAND
Address	
Postcode	
Tel. Number	
E-mail address	

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

11

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object



3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM 11 - Policy E.1 Land west of Ainsworth

He supports the additional information in respect of Bennerley Viaduct.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr Mrs Miss <del>Me</del> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

12

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object



3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM12 - Policy S.1 East of Church Lane, Brinsley

H&E supports criteria 4 and the use of 'conserve' instead of 'preserve' in line with NPPF terminology.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input checked="" type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

32

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object



3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM 32 - Policy 23: proposals affecting designated and non-designated heritage assets.

HE supports clarification about assessment of harm in Part 2 and the use of 'conserve' instead of 'preserve' in Part 3 all in line with NPPF requirements and terminology.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr Mrs Miss Ms Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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**Responses should be limited to the Main Modifications.**

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes



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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

38

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object



3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM38- Policy 32: Develop Contributions

HE supports the inclusion of criteria 1i in respect of the historic environment, heritage assets and setting.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.





Steffan Saunders  
Head of Neighbourhoods &  
Prosperity  
Broxtowe Borough Council  
Council Offices  
Foster Avenue  
Beeston  
Nottingham NG9 1AB

8th July 2019

Dear Steffan

**Broxtowe Borough Council Local Plan Part 2 - Main Modifications to Publication**  
**Version: Chetwynd Barracks**

Homes England is the new housing delivery organisation that has been created to adopt a more commercial approach, to respond to the long term housing challenges facing this country. It will bring together money, land and expertise to accelerate the supply of new homes and address affordability issues in areas of highest demand.

You will be aware from your meeting in March 2019 with Homes England colleagues and representatives from the Defence Infrastructure Organisation, (DIO), responsible for the MOD's Estate, that the two organisations have entered into a Partnering Arrangement in respect of seven surplus Ministry of Defence (MoD) sites, including Chetwynd Barracks. The objective of the Partnering Arrangement is for Homes England to assume project leadership on behalf of DIO, bringing project management and investment resources to:

- i) de-risk identified MoD sites;
- ii) accelerate new housing development; and
- iii) generate capital receipts for MoD.

Homes England has commenced working with DIO to deliver a phased, housing-led redevelopment of the Chetwynd Barracks site and it is anticipated that we will assume leadership of the project in the near future. Current plans involve a phased land disposal from 2021 and we envisage that an outline planning application will be submitted in early 2021, supported by a masterplan for the site.

[Redacted signature block]

[Redacted signature block]

Lucy Blasdale

[Redacted signature block]

As part of this process, Homes England is expecting to make a significant capital investment in planning, de-risking and primary infrastructure works on the site, as a catalyst for ensuring the early delivery of housing. Throughout this process, Homes England wants to work collaboratively with Broxtowe Borough Council, Nottingham County Council and the Neighbourhood Forum to realise the full potential of this important brownfield public sector site. However, to do so the policy framework needs to be clear about the details of the masterplan process and how it would interrelate to the planning application process.

Homes England **is concerned** that changes made to Policy 3.1 since the Examination (and promoted as part of the Main Modifications) do not provide the necessary clarity to be effective. Indeed, Homes England considers that the changes will hinder, rather than help, its aim of accelerating housing delivery on the site.

In particular, Homes England is concerned by some of the proposed policy wording regarding the proposed Strategic Masterplan. Specifically:

1. The scope / intent of the Strategic Masterplan is not clear.

Paragraph 3.4 1a) states that a Strategic Masterplan 'must be prepared for Chetwynd Barracks'. [My emphasis].

Paragraph 3.8, on the other hand, states that the Masterplan 'will be required to provide a high-level overarching framework to ensure that planning and delivery is properly coordinated across the two sites.' [My emphasis].

Chetwynd Barracks and the Toton Strategic Location for Growth are fundamentally different. Toton is not a single site; it is an area within which a number of uses are proposed and where the type, quantum and form of development is yet to be determined. By contrast, Chetwynd Barracks consists of a single site and proposed land uses are relatively well defined. The Toton Strategic Location for Growth could benefit from a 'high-level overarching framework'; Chetwynd Barracks would certainly not.

In our view, the scope of the proposed Masterplan should be restricted to the allocated Barracks site only, although having regard to linkages with the Toton Strategic Location for Growth and wider area. The intent of the policy needs to be clarified.

The use of the word 'strategic' when referring to the Masterplan for Chetwynd Barracks adds to the confusion regarding the intended scope of the document and should be deleted.

2. The policy is not clear about when the proposed Masterplan needs to be prepared; the essential point is that a Masterplan should be in place in order to inform the determination of any planning application for the redevelopment of the Barracks

site. The first sentence of Key Development Requirement 1a) should be amended to read:

'A Masterplan should be prepared for Chetwynd Barracks and approved by Broxtowe Borough Council as the Local Planning Authority as part of the planning application process'.

Associated changes would also need to be made to the reasoned justification.

3. Responsibility for leading the preparation of the proposed Masterplan isn't clearly stated. In our view, responsibility for leading the preparation of the Masterplan for the Barracks site should most appropriately rest with the owner of the majority of the allocated site: that would ensure the timely completion of the Masterplan, the buy-in of the main stakeholder and the effective use of the work that has already been undertaken. However, we do envisage a collaborative approach to its preparation that would involve engagement with the other stakeholders listed in paragraph 3.10 and support that element of the policy.
4. The status of paragraph 3.9 is not clear. The paragraph sets out in detail the elements that the proposed masterplan should address – i.e., the policy requirements – but is within the reasoned justification to Policy 3.1. If retained, it should be moved to become a Key Development Requirement.
5. A requirement to retain and reuse all existing military buildings or incorporate their footprint into the development layout would have a significant impact on the redevelopment of the site and would be wholly unreasonable. Further to the NPPF, the wording of Development Requirement 7b (Heritage) should be amended to clarify that not all existing military buildings on the site are likely to have sufficient significance to merit consideration in planning decisions. Where, it does not prove possible to retain a non-designated heritage asset, there could be more appropriate ways of preserving its memory than simply retaining its footprint. (In addition, it should be noted that the existing footprint of buildings could include modern elements, of no heritage interest or significance).

In summary, Homes England considers that the proposed wording of Policy 3.1 is insufficiently clear about the scope of the proposed Masterplan; that the policy should clearly identify the principal landowner as being responsible for preparing the Masterplan for Chetwynd Barracks and should also clarify how the Masterplan fits within the planning application process. Development Requirement 7b should also be amended, to avoid any confusion regarding its intention and to ensure that it accords with the NPPF.

I would be grateful if these points are taken into account by the Council on progressing the plan to adoption and would be happy to meet with you to discuss our concerns, if you felt that would be helpful.

Yours sincerely



**Lucy Blasdale**  
**Head of Land**

C.C. Planning Inspector (c/o Lisa Snow, Programme Officer)

## Broxtowe Part 2 Local Plan Review – Main Modifications

### DIO – Chetwynd Barracks

Proposed Amendments to Policy 3.1 (MM3) by JLL on behalf of DIO (by track change in green and comments in the right hand margin)

#### Policy 3.1 Chetwynd Barracks

**3.4 3.3** Former Ministry of Defence (MOD) site which, as per the 2016 ministerial announcement is no longer needed for national defence purposes. The site is previously developed (albeit that much of the site is open) and contains a number of buildings and structures related to the use as an MOD site including; barracks, staff housing, firing range, playing fields and car parking.

**3.4** Delivery of development on the site will continue beyond the plan period. The Key Development Requirements, as set out below, relate to the site as a whole and are required to ensure that the Barracks is treated as one entity and that a comprehensive and cohesive development is achieved to ensure that future development opportunities are not compromised.

#### Key Development Requirements:

##### 1. Strategic Masterplan:

- a) A Strategic Masterplan must should be prepared for Chetwynd Barracks and approved by Broxtowe Borough Council as the Local Planning Authority as part of the planning application process. The Strategic Masterplan should incorporate and demonstrate how the requirements set out in this policy have been complied with. It should be consistent with the Toton Strategic Location for Growth Illustrative Concept Framework (Map 8) and provide further guidance on site specific matters including the extent to which the requirements of Policy 3.1 have been complied with
- b) As a minimum, the Masterplan will set out
  - a vision and guiding principles/objectives for Chetwynd Barracks;
  - the spatial framework for development including key roads, landscape features, development plots and land use mix. This should include linkages to integrate the development with the Toton Strategic Location for Growth (site allocation 3.2);
  - the quantum of residential and employment development and how such development will be phased; and
  - the infrastructure requirements for Chetwynd Barracks including when, how and whom would deliver each requirement. This will include details of delivery of any infrastructure requirements shared with the Toton Strategic Location for Growth (Policy 3.2) and will have regard to phasing of development.

**Commented [IM1]:** At no stage did the Inspector at the Examination suggest that the masterplan be strategic or overarching in respect of Chetwynd Barracks and TSLfG. Instead, its purpose is to guide the development of the Barracks site, whether in whole or phased, to ensure its development is comprehensive and in line with the other KDRs.

**Commented [IM2]:** The Inspector at the Examination emphasized that the policy should be clear on how the masterplan would be processed, with particular reference to the how, the who, and the when. MM is lacking in this regard. The Council's officers confirmed also at the Examination that they considered there was no need for a SPD or AAP or other separate process. This implies that the process of the masterplan should be closely aligned with the submission and determination of planning application(s). This should be expressed.

**Commented [IM3]:** These changes, and those proposed in the form of 1b) below, are essentially a lift of paragraphs 3.9 and 3.10 of the reasoned justification, with minor amendments. DIO consider they set out requirements for the site, rather than explain them. As such, they should form part of the actual policy.

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##### 2. Delivery:

- a) Planning applications for development proposals of Chetwynd Barracks will be required to be in general conformity with the Strategic Masterplan.

- b) Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan.
- c) Development proposals must contribute proportionately towards the delivery of those infrastructure items set out in this policy and in the Infrastructure Delivery Plan.

### 3. New & Existing Homes:

- a) 500 Homes (within the plan period), ~~800+~~ with the capacity for 1,500 overall.
- b) Ensure that new development integrates with any retained MOD residential accommodation to the north of the site.

### 4. Connections & Highways:

- a) Provide attractive and convenient walking and cycling routes through the site connecting to the proposed HS2 station, ~~and to~~ the tram and to other recreational routes and nearby facilities.
- b) Provide a bus route through the site.
- c) Upgrade existing access points and road network within the site, with Chetwynd Road to be prioritised for buses, cyclists and pedestrians.
- d) Ensure that the ability to provide and should be safeguarded within the allocated area (including the operational Chetwynd Barracks site) to allow for future provision of a north/south road (or other means of movement) to link to the Tram  
Park and Ride site is positively facilitated by development to serve the development post plan period. The safeguarded route should be marked on the Masterplan.
- e) Any contribution to highway infrastructure must should be considered in conjunction with requirements for the Toton Strategic Location for Growth and wider area, as progressed through the Gateway Study and transport modelling but be proportionate to meet the particular residual need arising from development traffic from the Chetwynd Barracks site, once allowance has been made for existing operational traffic and mode share to other sustainable modes of transport, reflect the potentially different phasing of development of the two sites, and be capable of independent delivery.

**Commented [IM4]:** This change was proposed principally by DIO prior to the Examination, but has not been considered by BBC despite the Inspector raising this as a matter for subsequent consideration. The proposed change ensures that the delivery of the site is not compromised. In addition, we have added wording following the Council's confirmation at the Examination that there was no necessity for the road to serve the first 500 houses (i.e. the first phase to be delivered pre 2028) and the Inspector suggesting that this KDR should make reference to the Masterplan.

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**Commented [IM5]:** This was another change proposed by DIO prior to the Examination, raised by the Inspector for subsequent consideration by BBC, but not pursued. This change goes to the heart of the principal concerns of DIO and Homes England – i.e. the Policy as currently proposed by MM3 does not allow for sufficient independency in delivery between Chetwynd and TSLfG nor reflect that the two sites will have different needs in terms of supporting highways infrastructure.

### 5. Green Infrastructure, Open Space and Sports Pitches:

- a) Retain and enhance Green Infrastructure corridors around the eastern and northern areas of the site and create attractive links between open spaces.
- b) Retain and enhance the existing playing fields and sports facilities (including the pavilion) on the south eastern corner of the site.
- **Link open space at the east of the site.**
- c) Retain existing ~~large~~ mature trees and grass verges and incorporate these into a boulevard approach to the street scene.
- d) Retain existing Hobgoblin Wood.
- e) Ensure that management of woodland, green infrastructure and open spaces is secured in perpetuity.
- f) Provide on-site sustainable drainage system.

## 6. New facilities:

- a) Provide a new Primary School and Medical Centre within close proximity to the ~~open-space~~ playing pitches and sports facilities at the south east of the site.
- b) Provide small retail/service centre to meet local need along the main through route.
- c) ~~Provision of~~ Provide small scale employment development.

## 7. Heritage:

- a) Provide public access to the Listed Memorial to workers of National Filling Factory No.6 ~~(additional bullet point deleted)~~ Provide public space to the south of the memorial and retain/enhance the existing memorial garden.
- b) ~~Retain and reuse of existing military buildings (non-designated heritage assets) where possible, if not possible, the development should be designed to incorporate the existing footprint of the building into the building development layout. Identify the significance of the site and identify any potential non-designated heritage assets. The development should be designed to retain the memory of the historic buildings and their military function.~~

**Commented [IM6]:** Another change proposed by DIO pre-Examination, with the Inspector expressly asking BBC officers at the Examination why the proposed change was not acceptable.  
The proposed change by MM3 is too prescriptive and does not confirm with the guidance provided in the NPPF.

## Key Development Aspirations;

- 1. ~~Mitigate highways impact on the wider road network to ensure that congestion is not made worse than currently exists.~~
- 2. ~~Retain and re-use existing military buildings where possible, if not possible then incorporate existing footprint into the building layout.~~

1. Sustainable transport measures will be fully utilised to reduce reliance on the private car. Where there are residual cumulative impacts on the highways network these should be mitigated to ensure that they are not severe.

**~~\*\*Delete all existing justification text\*\*~~**

## Justification

3.6 The site and its sustainability credentials lead to the potential for development that goes well beyond the end of the plan period – 2028. The site as a whole is considered to have capacity for 1,500 new homes which must be provided as part of a comprehensive redevelopment with the provision of all required infrastructure (set out in the Key Development Requirements). The extent of development beyond 2028 will be the subject for review of the Part 1

Local Plan which will be undertaken with other Greater Nottingham authorities following the adoption of this Part 2 Local Plan. This will involve discussions with key stakeholders and wider consultation, including full engagement with the Toton and Chilwell Neighbourhood Forum, which intends to produce a neighbourhood plan covering Chetwynd Barracks and the surrounding area including land adjacent to the HS2 Station at Toton. However, to ensure comprehensive development of the site, consideration has been given to the potential capacity of the site and the key development requirements beyond the plan period.

## Strategic Masterplan

**3.7** The Council requires a joined-up, collaborative, cohesive and proactive approach to be taken to the planning and implementation of the significant development opportunity presented by Chetwynd Barracks and the Toton Strategic Location for Growth.

**3.8** A Strategic Masterplan will be required to provide a high level overarching framework to ensure that planning and delivery of development and infrastructure is properly coordinated across the two sites. It must be consistent with the Toton Strategic Location for Growth Illustrative Concept Framework (Map 8) and provide further guidance on site specific matters including the extent to which the requirements of Policy 3.1 have been complied with.

**3.9** As a minimum, the Strategic Masterplan will set out:

- A vision and guiding principles/objectives for Chetwynd Barracks;
- The strategic framework for development including key roads, landscape features, development plots and land use mix. This should include linkages to integrate the development with the Toton Strategic Location for Growth (site allocation 3.2);
- The quantum of residential and employment development and how such development will be phased; and
- The infrastructure requirements for Chetwynd Barracks including when, how and whom would deliver each requirement. This will include details of delivery of any infrastructure requirements shared with the Toton Strategic Location for Growth (Policy 3.2) and will have regard to phasing of development.

**3.10** The landowners/site promoters will prepare the Masterplan and co-ordinate the production of its supporting technical evidence base. Nottinghamshire County Council chairs the Toton Delivery Board (which has been tasked by local authority partners with the realisation of aspirations at Toton Strategic Location for Growth and the surrounding area including Chetwynd Barracks). Given this, it is anticipated that the County Council will play also a key role in the preparation of the Strategic Masterplan together with Broxtowe Borough Council, landowners/site promoters (including adjacent landowners), Chetwynd: The Toton and Chilwell Neighbourhood Forum, infrastructure providers and other statutory consultees. Public consultation must should be undertaken on the draft Strategic Masterplan prior to its submission finalisation to the Local Planning Authority as part of the planning application process.

**3.11** The Masterplan should be produced prior to or as part of the first planning application promoting development at the site. All Planning applications and any other consenting mechanisms must be in general conformity with the Strategic Masterplan, which has been formally approved by Broxtowe Borough Council.

## Key Development Requirements

**3.12** The Key Development Requirements apply to the whole Chetwynd Barracks site to ensure the allocation is planned as a single entity thereby ensuring a comprehensive and cohesive development is achieved. The policy identifies those

**Commented [IM7]:** This section has been largely lifted and is proposed by DIO to form part of the actual policy, as opposed to the reasoned justification, as it sets out the requirements of the masterplan rather than explains its purpose.

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**Commented [IM8]:** It is an accepted planning and development principle that it is up to the site promoters to develop and promote proposals. In this case, Homes England – Government's own agency – is involved with the development of the site and understandably is looking to lead this process to ensure prompt delivery of the site.

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**Commented [IM9]:** The current policy (as proposed by MM3) is silent on how the masterplan interrelates with the planning application process. This is an omission which needs to be rectified in order to provide clarity and effectiveness.



elements of the development that are expected to be delivered within the plan period.

**3.13** To facilitate the full scale of development at Toton and Chetwynd Barracks and provide necessary capacity on the local highway network highway improvements will be required. These should be consistent with the proposals set out in the East Midlands HS2 Growth Strategy and the emerging Gateway Study.

**3.14** The details of the retail / service centre referenced in this policy will be addressed as part of the Masterplanning requirement (above). The retail element should comply with Policy 13 of this plan which sets a maximum size limit threshold for individual units (for retail, leisure, office or food and drinks units) of no more than 2,500 square metres gross floorspace.

**3.15** The small scale employment provision of no more than 2 ha amounts to primarily B1 Use Office development (2 — 3.5 Ha); of B1, B2 and B8 units for SME companies

## Delivery

**3.16** In order to deliver sustainable development at Chetwynd Barracks and realise the aspirations set out in the East Midlands HS2 Growth Strategy, significant investment in infrastructure is required to meet the needs of residents and businesses. This includes transport, utilities, flood and surface water management measures, green infrastructure and open space and community infrastructure. The Council has prepared an Infrastructure Delivery Plan that sets out the infrastructure required to support growth at this location over the plan period and beyond.

The Council will undertake a periodic review of the Infrastructure Delivery Plan as information changes. This is to ensure it continues to provide an effective tool to support co-ordinated delivery of development and associated infrastructure across Chetwynd Barracks. The Council will work collaboratively with partners to ensure that the necessary infrastructure identified in the Infrastructure Delivery Plan is delivered and phased appropriately.

To promote efficient and effective joint working and to front load the planning process, the use of Planning Performance Agreements will be strongly encouraged for development proposals brought forward at Chetwynd Barracks. This will promote joint working between all parties, including statutory consultees, and will assist in focusing the issues that will need to be addressed prior to the submission of planning applications.

**Commented [IM10]:** To be consistent with MM26, which proposes to raise the threshold size quoted by Policy 13 from 500 sqm to 2,500 sqm.

**Commented [IM11]:** To be consistent with the evidence based provided by DIO on the market for this site. No other evidence has been presented on the likely scale or use of this part of the proposals.

## Genway, Tom

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**From:** Leaver, Peter [REDACTED]  
**Sent:** 08 July 2019 14:41  
**To:** Policy  
**Cc:** Leaver, Peter; Programme Officer  
**Subject:** Part 2 Local Plan Main Modifications Consultation  
**Attachments:** JLL (on behalf of DIO) Consultation Response to MM3 (Final).pdf; HE Letter - Broxtowe Council.pdf; Final DIO's proposed amendments to Policy 3.1 (MM3).pdf

Dear sir/madam

Please find attached a response by DIO to MM3. The response is in three parts:-

- Completed Consultation Response Form
- Letter from Lucy Blasdale, Head of Land at Homes England, to Steffan Saunders, Head of Neighbourhoods & Prosperity at Broxtowe BC, dated 8.7.2019
- Proposed amendments proposed by DIO and Homes England to Policy 3.1, with changes shown by track change (in green) and with explanatory comments (RH margin).

Please do not hesitate to contact me if you have queries about this submission.

Regards

Peter

**Peter Leaver**

Director - Planning & Development  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



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# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

DIO

Your Details

Title	Mr Mrs Miss Ms Other:
Name	Peter Leaver
Organisation (if responding on behalf of an organisation)	JLL
Address	██████████ ██████████
Postcode	██████
Tel. Number	██████████
E-mail address	██████████████████

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

**Yes**



Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request. **By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

**1. Which Main Modification does this response relate to?**

(please complete a separate form for each Main

Modification that you wish to comment on)

(Please see consultation document)

MM

3

**2. Do you support or object to the Main**

**Modification?**

Support

☐

Object

☒

**3. If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☒

It is not positively prepared e.g. strategy will not meet development needs

☒

It is not effective i.e. it won't work

☒

It isn't consistent with national policy

☒

It doesn't comply with the law

☐

**4. Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

## Context

At the examination, there was a general consensus that the allocation of Chetwynd Barracks by Policy 3.1 for 1,500 houses (of which 500 will be built in the plan period) was sound. However, the Inspector recommended to the Council that changes should be made to the policy, with particular regard to the addition of a requirement for a masterplan to be produced to ensure comprehensive development of the site. The Inspector advised officers of the Council at the Examination that the policy should set out clearly **how** the masterplan would be processed, **what** the mechanisms would be (i.e. in relation to the determination of planning applications), and **who** was going to lead its production.

Following the Examination, the Council has produced large scale changes to the policy to include a requirement for a strategic masterplan. This strategic masterplan is described as high level and overarching, to ensure a fully joined up approach between Chetwynd Barracks and the Toton Strategic Location for Growth (Policy 3.2). In addition, the County Council has been identified as playing a key role in its preparation, with the inference that the landowners/site promoters would play a subsidiary role along other stakeholders (e.g. the Neighbourhood Forum).

A similar approach has been taken with Policy 3.2 by MM4. This uses much of the same text in its reasoned justification and identifies also the County Council as playing the key role in the preparation of the strategic masterplan. There is one fundamental difference – the strategic masterplan for Toton Strategic Location for Growth is a Key Development Requirement for development expected **beyond** the plan period (see Part B). It is not a Key Development Requirement for development **within** the plan period – the stipulation for Chetwynd Barracks.

The position for the responsibility of the delivery of the Chetwynd Barracks site has also changed since the Examination. DIO has now entered a partnering arrangement with Homes England in respect of seven surplus sites across the country, including Chetwynd Barracks.

Homes England has wide experience in bringing forward housing development on large brownfield sites, which have complex issues and a variety of interests to balance. This experience has taught Homes England the importance of a clear planning policy framework in delivering good quality new homes at the required pace.

Homes England has already started working with DIO on the delivery of Chetwynd Barracks and has considered the proposed changes to Policy 3.1. It **is concerned** that they do not provide the necessary clarity to be effective and that they will **hinder**, rather than help, the **delivery** of housing on the site.

Homes England has recently written to the Borough Council to set out its concerns and a copy of their letter is attached to the Representations. Homes England's principal concerns can be summarised as:-

- the **scope/intent** of the masterplan is not clear;
- the policy is not clear **when** the proposed masterplan needs to be prepared and **how** it relates to the planning application process; and
- the **responsibility** for leading the preparation of the masterplan is ambiguous.

There is a particular concern about the uncertainty and ambiguity of the reference in para 3.8 to a strategic masterplan providing a high-level over-arching framework to co-ordinate planning and development of Chetwynd Barracks and Toton Strategic Location for Growth. It is not clear if the Council intends one strategic masterplan to cover both sites or separate masterplans for each site. It is the strong view of DIO and Homes England that the former would result in an unnecessary delay in delivering the redevelopment of Chetwynd Barracks for new homes.

Chetwynd Barracks and Toton Strategic Location for Growth are fundamentally different sites. Chetwynd Barracks is a relatively straightforward brownfield single site with an existing relationship with the surrounding built environment and an established infrastructure (in terms of site access, services, utilities and mature landscape features). By contrast, Toton Strategic Location for Growth is a greenfield site in multi ownership, with limited existing infrastructure, planned on the premise of proposals for a major, but uncertain, transport hub (i.e. HS2 station). Whilst Toton Strategic Location for Growth may benefit from a high-level overarching framework, Chetwynd Barracks would not.

To ensure delivery of the Chetwynd Barracks site is not constrained, Policy 3.1 (and 3.2) needs to make it clear that the remit of the masterplan for Chetwynd Barracks concerns just Chetwynd Barracks and not a much wider area.

### **Principal Proposed Changes to MM3 concerning the Masterplan**

DIO and Homes England propose a limited number of edits to MM3, to meet the tests of effectiveness and positive plan preparation, and to address their concerns.

These are provided on the attached version of Policy 3.1, as proposed to be modified by MM3, and with the suggested amendments of Homes England and DIO shown by track change in dark green. Commentary has been added in the righthand margin to explain and justify the changes in light of discussion of the policy at the Examination.

The suggested amendments concerning the masterplan cover:-

- Deletion of the word 'strategic' as a descriptor to 'masterplan', in order to help clarify the scope of the Chetwynd masterplan.
- Lifting paragraphs 3.8 and 3.9 of the reasoned justification to become part of the actual policy – Key Development Requirements 1 a) (in part) and 1 b), recognising that the paragraphs actually set out policy.
- Adding a sentence to the beginning of paragraph 3.10 to state that the landowner/site promoter will prepare the masterplan, to ensure that responsibility for its preparation is clearly and appropriately allocated.
- Adding a sentence to the end of paragraph 3.10 and a sentence to the beginning of paragraph 3.11 to clarify how the production of the masterplan will interrelate to the planning application process, to ensure that a masterplan is in place to help with the determination of a future planning application.

### **Other Proposed Changes to MM3**

The other changes proposed by DIO and Homes England relate to:-

- Key Development Requirement 4 d) – north/south road.
- Key Development Requirement 4 e) – highway infrastructure.
- Key Development Requirement 7 b) – non-designated heritage assets.
- Paragraph 3.14 – retail/service centre.
- Paragraph 3.15 – small scale employment.

The first three are outstanding matters from the Examination which the Council has not addressed further, despite being asked expressly to do so by the Inspector.

The suggested amendments to Key Development Requirements 4 d) and e) are required to provide clarity and effectiveness and ensure conformity with the NPPF. Key Development Requirement 4 e), as currently worded by MM3, could be misinterpreted to require the acquiescence of third- party landowners. The amendment proposed by DIO and Homes England seek to insure against this delivery risk and add in the Inspector's suggestion that any safeguarded route be marked on the masterplan.

The suggested amendment to Key Development Requirement 4 e) goes to the heart of the matter in terms of contributions to highways infrastructure and the overall approach to masterplanning (as referred to above). DIO and Homes England acknowledge that the policies for Chetwynd Barracks and Toton Strategic Location for Growth should cross refer to each other to a certain extent. However, it is also vital that each site is capable of **different phasing** and/or **independent delivery** (i.e. is not reliant upon each other). This was a point expressly raised by the Inspector in Question 6 to Matter 6 prior to the Examination. This points to two separate masterplans – not one overarching strategic masterplan – particularly as their requirements in terms of timescale of production differ. In addition, Key Development Requirement 4 e) should make clear that any contribution should be proportionate to need and take into account the different circumstances of each site (e.g. Chetwynd Barracks is a currently active site with existing vehicular flows).

The drafting of Key Development Requirement 7 b) is a concern of both Homes England and DIO. The approach is far too prescriptive, does not conform with the guidance contained in the NPPF, and could compromise delivery of a large part of the site.

Policy 13 has been modified (MM26) and refers now to a threshold of 2,500 sq m (rather than 500 sq m) for impact assessment for edge of centre and out of centre retail proposals. Paragraph 3.14 should be amended to be consistent with this modification.

Finally, no evidence has been presented by the Council, or any third party, which suggests that employment provision should be restricted to B1 offices and take up between 2 – 3.5 hectares of land. The only evidence presented on this matter has been by JLL on behalf of DIO in the technical statement that supported the representations submitted in response to the Pre-Submission draft. This evidence considered there was a limited market for about 5,000 sq m of small B1, B2 and B8 units for local SME companies. Such a development would not require more than 2 hectares of land.

#### Enclosures

- Letter from Homes England to Broxtowe Borough Council
- Proposed amendments to MM3 by DIO and Homes England

**This form is available in large print and other formats on request.**

Please use a separate sheet of paper if required.

## **SCHEDULE OF PROPOSED MAIN MODIFICATION – PART 2 LOCAL PLAN**

### **Chetwynd Barracks Site**

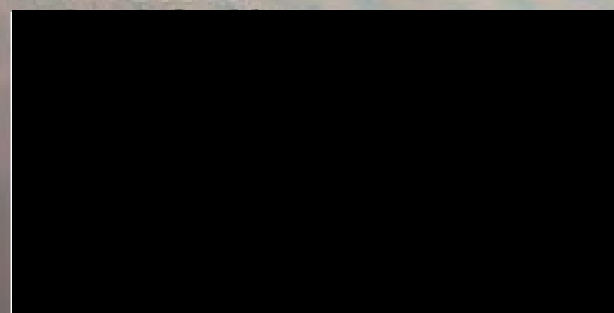
#### **MM3 – Key Development Requirements**

##### **4. Connections & Highways:**

There is no information in the modification to give us an idea if the north/south road would be constructed first. It would be ideal to construct the north/south road first. Heavy Goods/Duty Vehicles could then access the Chetwynd Barracks site from the A52 or Nottingham Road to alleviate or avoid congestion from the wider road network – one being the B6003 road.

Those living on the B6003 road had already experienced the chaotic congestion during the NET Tram construction. We ask the Council to consider this in their final report regarding this matter.

Ms A Codner





**Genway, Tom**

---

**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awsworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new

builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



Nottinghamshire Wildlife Trust is the county's largest environmental charity - run by local people for the benefit of local wildlife. We manage nature reserves across the county, champion nature and inspire adults and children about the natural world. Together we are working to create a Living Landscape for Nottinghamshire.

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**BROXTOWE BOROUGH COUNCIL**  
**Local Plan Part 2:**  
**MAIN MODIFICATION 3**

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Representations on behalf of  
BLOOR HOMES

July 2019

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## **Contents**

- 1.0 Introduction.**
- 2.0 Representation to Main Modifications: 3**

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## **1.0 Introduction**

- 1.1 These representations have been prepared on behalf of Bloor Homes who have a number of land interests in Broxtowe. We have previously made representations to Broxtowe for many years on behalf of Bloor Homes during both the development of the Greater Nottingham Aligned Core Strategies (ACS) and earlier consultation stages of the Broxtowe Local Plan Part 2 (LPP2).
- 1.2 Bloor Homes have serious concerns about the soundness of LPP2, particularly in relation to the approach to housing and the allocation at Chetwynd Barracks, and object to the modifications set out. Details of their concerns are set out in these representations, with reference to particular policies and paragraph numbers where relevant. These representations also outline modifications to LPP2 which are considered necessary to make it sound.

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## **2.0 Main Modification 3: Changes to Policy 3.1 Chetwynd Barracks**

- 2.1 We welcome clarity in respect of the total capacity of the site being detailed as 1,500 homes in the policy. We also welcome the requirement for a strategic masterplan to be developed for the site to inform development proposals and demonstrate connections with the Toton Strategic Location for Growth and proposed HS2 station.
- 2.2 However, as outlined in our representations to Matter 6 (November 2018), we consider that only a fraction of the 500 homes envisaged in the housing trajectory could be relied upon to be delivered during the Plan period due to the complex nature of the site and short timescales envisaged for addressing constraints. Indeed, we have raised concerns about the delivery of the Chetwynd Barracks proposals for many years and are yet to see any evidence which justifies the levels of housing proposed in Policy 3.1 within the Plan period.
- 2.3 Furthermore, in respect of the highways infrastructure which is proposed to be brought forward in conjunction with the Toton allocation, this is proposed to be directed through part of our client's land and not only is there no agreement in place with the Council but there have also been no discussions with the Council about how the infrastructure will be developed. This only introduces a further layer of uncertainty about how many homes will be delivered from the allocation during the Plan period.
- 2.4 As no evidence has been produced over a number of years to confirm the delivery of 500 homes from the site within the Plan period, this number should be significantly reduced within the trajectory in both Policy 3.1 and Table 5. Without a reduction in the number of homes to be delivered from this site, LPP2 will not be deliverable over the Plan period and will therefore not be sound as required by paragraph 182 of the 2012 NPPF.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	Bloor Homes Ltd
-----------------------------------	-----------------

## Your Details

Title	Mr Mrs Miss Ms Other: Mr
Name	Ben Holmes
Organisation (if responding on behalf of an organisation)	Oxalis Planning Ltd
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]	

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

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**By submitting this response form you are agreeing to these conditions.**

## Please return completed forms to:

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

3

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

☐

Object

☒

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☒

It is not positively prepared e.g. strategy will not meet development needs

☒

It is not effective i.e. it won't work

☒

It isn't consistent with national policy

☒

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

Please see attached Statement

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form







Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr	<input checked="" type="checkbox"/> Mrs	<input type="checkbox"/> Miss	<input type="checkbox"/> Ms	Other:
Name	DAVID RHEAD				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

**BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICE**  
- 2 JUL 2019

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(Please see consultation document)

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Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

PLEASE SEE "REASON FOR OBJECTION"  
ON ATTACHED SHEET

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



## Background

According to *Aligned Core Strategies Part 1 Local Plan*, Broxtowe has:

- Policy 14 “Managing Travel Demand”
- Policy 15 “Transport Infrastructure Priorities”.

For new developments, both policies advocate shifts to travel-modes other than private car, where cycling is an important alternative mode.

Developments at “Toton Strategic Location for Growth” and at Chetwynd will create thousands of homes/jobs. If the visions of Policy 14 & Policy 15 become reality, the developments will generate thousands of extra cycle-trips, not just within the two developments but to/from other destinations (e.g. Chilwell School, Beeston town-centre, Boots Enterprise Zone, University of Nottingham, QMC).

In practice – despite Broxtowe’s Policy 14 & Policy 15 – Broxtowe’s September 2017 *Infrastructure Delivery Plan*:

- fails to mention cycling, let alone any plans to deliver any cycling infrastructure
- is therefore unsound as a foundation for developments that need to comply with *Aligned Core Strategies’* Policy 14 and Policy 15.

In the particular case of Chetwynd, the *Infrastructure Delivery Plan*:

- fails to address the problem of how children will walk/cycle safely between Chetwynd and Chilwell (secondary) School (despite Transport Minister Jesse Norman advocating “transition to a world where a 12-year-old can cycle safely”)
- fails to address the problem of how people will cycle safely from Chetwynd to Beeston town-centre (by some route that avoids the tram-lines),<sup>1</sup> to Boots Enterprise Zone, to the University, and to Queen’s Medical Centre.

Similarly – in MM3 – there’s a serious “reality gap” between:

- The vision in item 4(a) on Page 9 of “attractive and convenient ... cycling routes ... to ... nearby facilities” – and in Item 1 on Page 11 that “sustainable transport measures will be fully utilised to reduce reliance on the private car” – and ...
- The apparent failure of Broxtowe to coordinate with the County Council to plan/fund/deliver the cycling infrastructure needed to convert the vision into a reality.

Despite Broxtowe’s Policy 14 & Policy 15, and the words quoted above from MM3 Pages 9 & 11:

- although Item 3.13 on Page 14 of MM3 says “to ... provide necessary **capacity** on the local **highway** network, **highway improvements** will be required”, ...
- Item 3.13 fails to say “to ... provide necessary **capacity** on the local **cycle-route** network, **cycle-route improvements** will be required”.

---

<sup>1</sup> For evidence of how dangerous tram-lines are to cyclists, Google “Roger de Klerk Croydon”, “Zhi Min Soh Edinburgh” and “John Melia tram Beeston”.





### ***Reason for objection***

The text in MM3 is based on invalid assumptions about availability – within cycling distance of Chetwynd – of cycling infrastructure which is safe, and which will have sufficient capacity.

### ***Suggestion***

I suggest the following changes to the MM3 text

- In Item 4(e) on Page 9, replace  
Highway infrastructure must be considered ...  
by  
Highway and cycle-way infrastructure must be considered ...
- In Item 3.9 on Page 13, replace  
... key roads, landscape features ...  
by  
... key roads, cycle-routes, landscape features, ...
- In Item 3.13 on Page 14, replace  
“to ... provide necessary capacity on the local highway network, highway improvements will be required”  
by  
“to ... provide necessary capacity on the local highway and cycle-way networks, highway and cycle-way improvements will be required”
- In Item 3.16 on Page 15, replace  
“The Council has prepared an *Infrastructure Delivery Plan* that sets out the infrastructure required to support growth at this location over the plan period and beyond”  
by  
“Although the Council prepared an *Infrastructure Delivery Plan* in 2017 – covering some of the infrastructure required to support growth at this location over the plan period and beyond – the **Council must now produce a new version, to include plans for cycling infrastructure** (to provide a foundation for new developments’ compliance with *Aligned Core Strategies*’ Policy 14 “Managing Travel Demand” and Policy 15 “Transport Infrastructure Priorities”).



# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Steve Beard
Organisation	Sport England
Address	<div></div>
Tel. Number	<div></div>
E-mail address	<div></div>

All comments must be received by 5pm Tuesday 9 July 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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## Questions

Which Main Modification does this response relate to?	MM3
Do you support or object to the Main Modification?	Support

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Mark Trought
Organisation	Private Individual
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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## Questions

Which Main Modification does this response relate to?	MM3
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	I support the majority of the modification. However, whilst I agree with the need to protect the mature trees in Hobgoblin Wood, the modification specifically includes Hobgoblin Wood but does not mention other areas of trees. I am concerned that specifically including Hobgoblin Wood and no other area of trees, suggests that other trees which will not form part of the "boulevard appearance" will have reduced protection. In particular I am concerned that the trees to the north-west of the site running up from the quarry which are the remnants of a wooded area shown as Hill Close on an 1899 map of the area will be lost.

# Main Modifications 4

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	TEJ PROPERTIES
-----------------------------------	----------------

## Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	MUSA CHOUDHARY
Organisation (if responding on behalf of an organisation)	BARTON WILLMORE
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

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*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

4

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

☒

Object

☐

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

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☐

It is not effective i.e. it won't work

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It isn't consistent with national policy

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☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

PLEASE SEE ATTACHED DOCUMENT

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

Broxtowe Local Plan Examination in Public  
Response to the Main Modifications to Part 2 of the Local Plan  
Made on Behalf of Tej Properties  
MM4- Policy 3.2- Land in the Vicinity of HS2 Station at Toton  
(Strategic Location for Growth)

**This Statement is made on behalf of the Tej Properties ('our Client'),** in response to the Main Modifications proposed to Part 2 of the Broxtowe Local Plan as part of the Examination in Public process which are currently being consulted upon. Main Modifications to a plan are usually proposed when an Inspector finds that a plan is unsound or legally non-compliant as submitted but can be made sound by modifications. The modifications relate directly to the reason why the Inspector has found the plan unsound.

In the case of the Broxtowe Part 2 Local Plan, the Inspector has asked that the consultation be carried out to make any changes which may be necessary to make the plan sound and legally compliant.

Tej Properties have land interests at Toton Sidings and land in the vicinity of the HS2 station. The Sidings are located adjacent to residential development to the east and the railway line to the west. The site is located within easy reach of the national road particularly the M1.

Toton Sidings are allocated under Policy 3.2- land in the vicinity of HS2 Station at Toton (Strategic Location for Growth). **Our Client's land interests are shown on revised map number 7.**

The site is currently located in the Green Belt. However, The Green Belt Review demonstrates that the **site makes a minimal contribution to the surrounding Green Belt. Our Client's Site is situated within Zone 2 of the Green Belt Review.** This achieves the second lowest scoring within the main built up area.

The site offers a suitable location for development as it is located in close proximity to existing services **and the technical reports supporting the site's promotion demonstrate that there are no known constraints to development.** It would also not present any adverse environmental conditions. Furthermore, the site is available as there are no legal or ownership problems. The landowners have sole control of the site and are committed to developing it.

Throughout the stages of the Local Plan preparation, our Client has supported the release of the land at Toton for development with or without the HS2 Station. The land comprises previously developed land, has significant technical work demonstrating the suitability of the site and has successfully opposed a Town and Village Green application.

Our Client wholly supports the proposed allocation for mixed use development of the site are the wider area.

Our Client supports the inclusion in the 'Strategic Policy Context' section of policies 4, 15 and 16 which recognises that the site has wider benefits to the area and can contribute to the sustainable development of the borough including economic, transport and green infrastructure.

#### Key Development Requirements Within the Plan Period

The site had previously had an allocation proposed in earlier iterations of the plan for 500 dwellings. Our Client supports the Main Modification which proposes to amend this to between 500 and 800 homes with an overall capacity for 3,000 homes (policy A(i)).



Our Client also supports the removal of the minimum 40 dwellings per hectare density requirement in favour of ensuring development comprises a blended density taking into account adjacent development (policy A(ii)).

Our Client supports the inclusion of ensuring that the site delivers a minimum of 18,000m<sup>2</sup> of mixed-use employment (policy A(iii)) to provide high skilled jobs in the immediate area and wider region.

#### Key Development Requirements Beyond the end of the Plan Period

Our Client supports the inclusion of policy B and C on the requirement to produce a masterplan for the Strategic Location for Growth. Our Client also welcomes paragraph 3.30 of the corresponding justification text which sets out that the County Council and Borough Council will play a key role in the preparation of the masterplan. Our Client also supports paragraph 3.29 which states that the area around the proposed station is a low valley and that development here will be able to incorporate tall buildings including a landmark building and mixed use floorspace in a landscaped setting.

#### Key Development Requirements to be subject to the Strategic Masterplan

Our Client supports the modification to policy D(Va) which sets out that the tram extension should be designed to facilitate further extension of the HS2 Station.

Our Client supports paragraph 3.28 specifically that text which sets out that the masterplan should establish a major new high-tech research adjacent to the hub station, that high quality housing and employment makes best use of the land around the hub station.

#### Key Development Requirements

Our Client also supports the inclusion of paragraph 3.26 and 3.27 which seek to ensure that development of the allocation is undertaken in a comprehensive and cohesive manner and that significant investment in infrastructure is required to meet the needs of the area in order to achieve sustainable development respectively.

However, our Client considers that it should be made clear in the policy that the preparation of a masterplan is a requirement for the future and that it should be undertaken at a later date to ensure that it does not delay the adoption of the plan.

Paragraph 3.36 which encourages the use of Planning Performance Agreements for development proposals in the area and assist in joint working is also supported.

#### Conclusion

These representations have been prepared on behalf of Tej Properties and set out their comments in relation to the Broxtowe Borough Council Part 2 Local Plan Main Modifications.

Our Client has land interests at Toton Sidings which fall within a wider allocation under policy 3.2-Toton Strategic Location for Growth. Our Client has a keen interest in the development of the site and is committed to ensuring that the Local Plan Part 2 is prepared on a sound and robust basis which meets the tests of paragraph 35 of the Framework. It has been demonstrated throughout both the Core Strategy and Local Plan Part 2 preparation that their land interests are suitable, available and achievable and is a deliverable site.

Our Client supports the changes proposed by the Main Modifications to the policy and the continued allocation of the site for mixed use development. Our Client welcomes the proposed modification which

seeks to increase the number of dwellings on site, the inclusion of the site being developed for mixed use employment as well as to proposed changes to the density of development on the site.

The proposed modification which sets out that the area around the proposed station has the ability to incorporate tall buildings is also supported.

Our Client agrees with and supports the requirements for a masterplan for the wider Strategic Location for Growth which also sets out that both the County Council and Borough Council should play a key role in. This will help to ensure that the area is developed in a comprehensive and cohesive, rather than piecemeal, fashion.

We consider that upon acceptance of the proposed changes, the plan is sound and legally compliant.

Although further hearing sessions are not usually held at this stage, if the Inspector considers them essential to deal with any of the issues raised by the representations, Barton Willmore, on behalf of Tej Properties reserve the right to attend.

We trust that these representations will be taken into consideration going forward. If you require any further information or have any queries in connection with the site, please do not hesitate to contact us.

**Broxtowe  
Borough  
COUNCIL**

Please provide your client's name	<i>Not applicable</i>
-----------------------------------	-----------------------

Title	Mr	Mrs	Miss	Ms	Other:-
Name	Graham Heal				
Organisation (if responding on behalf of an organisation)	Chetwynd: The Toton and Chilwell Neighbourhood Forum				
Address	<div>██████████</div> <div>██████████████████</div> <div>██████████</div>				
Postcode	██████████				
Tel. Number	██████████████				
E-mail address	██████████████████████████████				

***Responses should be limited to the Main Modifications.***

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

**Yes**

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

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Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

**3. Policy 3.1**

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

**Yes**

Object

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)  
If you wish to comment on more than one Modification, please use a separate form for each.

1. The modification fully represents the Forum's views regarding this Policy – not least the need to ensure:
  - That the Barracks must be treated as one entity and that a comprehensive and cohesive development is achieved
  - That an overarching Strategic masterplan is created covering the whole site
  - This masterplan needs to be mindful of, and conform to, the masterplan developed for the Strategic Location for Growth – see Policy 3.2
  - The Forum must be engaged in providing input to the development of the masterplan
2. Other additions made to this Policy (such as the retention of Hobgoblin Wood and the need to create attractive links between open spaces) are also fully supported.
3. Overall, we believe this Policy is much stronger and we are very pleased with the changes made.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

**4. Policy 3.2**

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

**Yes**

Object

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

5. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)  
If you wish to comment on more than one Modification, please use a separate form for each.

1. The modification represents the Forum's views regarding this Policy, in particular:
  - The provision of multi-functional green infrastructure corridor to the south of the area
  - That the road infrastructure must take into account the requirements for road access to Chetwynd Barracks
  - That a Strategic masterplan needs to be prepared and include the development expected to be delivered after 2028
  - The Forum must be engaged in providing input to the development of the masterplan
2. Overall, we believe this Policy is stronger and we are pleased with the changes made.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

34. Policy 26

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

Yes

Object

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

6. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)  
If you wish to comment on more than one Modification, please use a separate form for each.

1. The modification fully represents the Forum's views regarding this Policy especially the additional text to para 26.1 that travel plans need to provide details how developments will encourage non-car use though more walking, cycling and use of public transport.
2. Overall, we believe this Policy is much stronger and we are pleased with the changes made.

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Gillian Moore
Organisation	Resident
Address	[REDACTED]
Tel. Number	
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	Housing
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).	
It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	Toton already becomes gridlocked when there is an incident in long Eaton or chilwell or beeston or sandiacre or stapleford or the m1. The traffic on stapleford lane and toton lane is contiuous limiting residents exit from current housing. Another 1000 houses with minimum 1 car per house puts extra pressure on the roads. Bardill island also becomes gridlocked regularly due to volume of traffic and poor lane markings. We will be left with no greenbelt in an already saturated part of broxtowe.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	WHITEHEAD (CONCRETE) LTD & FOLLOWS INVESTMENTS LTD
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Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	MARK FLATMAN
Organisation (if responding on behalf of an organisation)	iPLAN SOLUTIONS LTD
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes



Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

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Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)



1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM   
(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support ☐

Object ☒

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☒

It is not positively prepared e.g. strategy will not meet development needs ☒

It is not effective i.e. it won't work ☒

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

SEE ATTACHED

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



**BROXTOWE LOCAL PLAN PART 2**

**MAIN MODIFICATIONS MAY 2019**

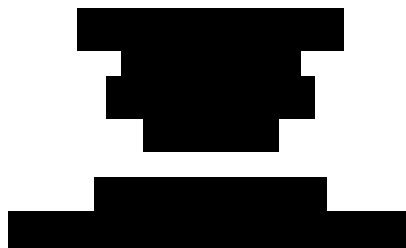
**OBJECTION TO MODIFICATION MM4 - POLICY 3.2 TOTON**

**RESPONDANT 1201**

**WHITEHEAD (CONCRETE) LTD & FOULDS INVESTMENTS LTD**

**PREPARED BY**

**Mark Flatman  
Managing Director**





These objections on behalf of R. Whitehead (Concrete) Ltd and Foulds Investments Ltd (**Foulds**) are made to made Proposed Main Modification MM4 of May 2019 in respect of Proposed Main Modification MM4 to Policy 3.2 Toton.

The appendices appended to this Objection are scheduled as follows;

<b>Appendix Mod1</b>	Extract CD-04 Policy 3.2 Submission version Pt 2 LP, July 2018 - PDF page 8
<b>Appendix Mod2</b>	Modification MM3 of BBC/02 Schedule of Main Modifications, September 2018 – PDF page 12
<b>Appendix Mod3</b>	Extract from Pt2 LP Main Mods Tracked Changes, May 2019 – PDF page 13
<b>Appendix Mod4</b>	HS2 Phase 4B and Beyond, HoC Briefing, September 2018 – PDF page 16
<b>Appendix Mod5</b>	House of Lords Economic Affairs Committee Rethinking HS2, May 2019 – PDF Page 60

- 1.1 By reference to Policy 3.2 in the September 2017 Publication Version of the Broxtowe Pt2 LP, CD/01, it is conspicuous by the absence of any specific Policy 3.2 text in respect of the Toton strategic growth location.
- 1.2 Within the September 2018 **Submission Version of the Broxtowe Pt2 LP** dated July 2018, CD/04, specific text in relation to the justification and explanation of the expected operation of Policy 3.2 for Toton is set out between pages 34-37, see **App Mod1**. This text makes no reference whatsoever to the provision of the 18,000 ft<sup>2</sup> of the class B floorspace required by policy 4(e) of the ACS.

- 1.3 Within the proposed September Schedule of Modifications to the Pt2 LP dated September 2018, BC/02, reference to provision of the B class employment floor space is expressly proposed to be struck through and deleted, also denoting the LPA intention that this was proposed to take place beyond the plan period, see **App Mod2**..
- 1.4 Despite the realism of delivery being achieved within the plan period being challenged by a number of participants at the Examination, the Council now proposes that within its proposed Main Modifications of May 2019 that policy 3.2 be amended yet again to propose a minimum provision of 18,000 m<sup>2</sup> of B class employment floor space that it expects will be completed within the plan period by 2028, see **App Mod3**. This is solely predicated upon the provision of Policy 4(e) the within the ACS adopted 2014.
- 1.5 However, subsequent events in the intervening period have transpired to render deliverability of the aspired quantum of B class floorspace at Toton by April 2028 exceedingly unlikely. As a consequence the plan conflicts with paragraphs 15 and 16 of the Framework 2019, notably criterion 16b). Moreover, paragraph 153 of the 2012 Framework against which this plan is examined requires a plan to respond flexibly to changing circumstances. As a consequence of the focus of 50% of the ACS strategic requirement at Toton within the LP Pt 2, despite the changed delivery timescale for HS2 means that there are insufficient deliverable employment site allocations being made during the plan period within Broxtowe thereby demonstrating that the plan has not been positively prepared and rendering it ineffective, inflexible and unsound.
- 1.6 Timing of delivery of employment land will be inevitably be interrelated with the timescale for delivery of HS2 Phase 2B within which provision is made for the Toton Station.
- 1.7 Section 4.5 on page 30 of the House of Commons Briefing paper on “HS2 Phase 2b and Beyond” of September 2018, see **App Mod4**, notes that the Hybrid Bill for Phase 2b was expected to have been published by the end of 2019, however at the beginning

of September 2018 it was announced that the Bill would now likely be delayed to the end of 2020 to enable design integration with the Northern Powerhouse Rail.

- 1.8 Even on the proposition of the timeline suggested by HS2 on its website, <https://www.hs2.org.uk/timeline-2b/>, Royal Assent to the Bill is not anticipated until mid-2023 with construction not commencing until 2024 and the passenger service not becoming operative until late 2033. Even this timescale will by now have slipped by a further 12 months if the advice contained in the House of Commons briefing paper of September 2018 proves to be correct. Subsequent delays associated with Brexit can only serve to compound matters.
- 1.9 Indeed in March 2019 it was widely reported in the media that Ministers have now delayed signing off on the first half of spending for HS2 due to costs escalation, <https://www.telegraph.co.uk/politics/2019/03/31/ministers-have-delayed-signing-first-half-spending-hs2-six-months/>
- 1.10 There is therefore a considerable degree of uncertainty associated with the delivery in principle and associated timing for HS2 and the subsequent HS2 Phase 2b. These are matters entirely outside of the control of Broxtowe BC and therefore the planning uncertainty regarding development at Toton is entirely understandable. However, on the balance of probabilities the timeline for HS2 Phase 2b will shift further back in time rather than be brought forward. Delays for this major infrastructure project are highly likely to result in causing consequential delays in the associated employment floor space delivery. Indeed in May 2019, the House of Lords Economic Affairs Committee report Rethinking High Speed 2 proposes a complete rethink in the approach to HS2 and potentially integrating it with Northern Powerhouse Rail in order to alleviate the economic disadvantages experienced in the north of the country, see **App Mod5** . Were this to transpire, considerable further delays can be envisaged.
- 1.11 Accordingly, in order to ensure the achievement of the overarching requirement of ACS policy 4b) of delivering 34,000 m<sup>2</sup> of B class employment within the plan period to 2028 within Broxtowe, it is requested that a far more flexible and holistic approach is required within the Pt2 LP and Policy 3.2 be more flexible to allow for delay or even non-delivery of employment floor space at Toton during the plan period to 2028. It is



requested this be achieved by incorporating into the Pt 2 LP the measures proposed on behalf of Whitehead (Concrete) Ltd and Foulds Investments Ltd through the LP Examination during December 2018.

## Policy 3.2: Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)

### Strategic policy context

[Aligned Core Strategy Policy 2: The Spatial Strategy](#)

### What the Aligned Core Strategy says

Policy 2.3a iii) allocates a strategic location for growth on land east and west of Toton Lane including Toton Sidings in the vicinity of the proposed HS2 station at Toton, in Broxtowe. The plan specifies that the allocation should include a minimum of 500 homes with the appropriate mix of this and other development to be determined in the part 2 local plan.

**3.9** Delivery of development on the site will continue beyond the plan period. The Key Development Requirements, as set out below, relate in part to the first 5 years of the Local Plan, but also to the site as a whole and are required to ensure that the site is treated as one entity and that a comprehensive and cohesive development is achieved to ensure that future development opportunities are not compromised. For early phases of development it is essential to ensure that the form of development is consistent with wider development opportunities in order to secure a high quality sense of place facilitating further development opportunities at the point that the HS2 station is open to passengers.

**3.10** The following Key Development Requirements must be met.

### Key Development Requirements between 2018 - 2023

- 500 Homes of a minimum net density of 40 dwellings to the hectare and associated infrastructure to deliver this, these should be located towards the South of the Strategic Location for Growth.
- Limited local retail provision of a scale that does not compete with the retail offer in nearby centres including Long Eaton, Stapleford and Sandiacre.
- Development should be located and designed to complement and not prejudice proposals for access to the HS2 Hub Station and Innovation Village which is to be delivered beyond the plan period.
- Highway infrastructure must be considered in conjunction with requirements for the Chetwynd Barracks allocation (Policy 3.1) and wider area as progressed through the Gateway Study and transport modelling.

### Key Development Requirements for the Strategic Location for Growth stretching significantly beyond the end of this Part 2 Local Plan

The development of an innovation village comprising the following minimum and to be confirmed as part of the review of the Greater Nottingham Aligned Core Strategies:

#### Community Provision

- Provide space for provision of an expanded or potentially relocated George Spencer Academy including a new Primary School.
- Provide space for provision of a relocated Leisure hub with space for a Leisure centre including indoor sports centre and 25m swimming pool and outdoor sports pitches.
- Provide a new community centre.
- Provide a new health centre.



- Provide a new neighbourhood scale retail centre.

### **Traffic / Transport / Connectivity**

- A system that flows well for all modes of transport including a multi modal transport hub adjacent to the station and proper consideration of access both from Long Eaton and Stapleford, and how the HS2 site will connect and complement development at the Chetwynd Barracks site. As a minimum this will include good connectivity for cycling and pedestrians from the northern end of Chetwynd Barracks to access the tram and HS2 station via a network of interconnected Green Infrastructure. It will also enable the provision of high quality transport links to the other nearby centres in Broxtowe and Erewash, the three city centres of Derby, Leicester and Nottingham, the airport and strategic rail connected development at Roxhill in Leicestershire to the south and towns in East Derbyshire and West Nottinghamshire to the north.
- Maximise the potential for trips to and beyond the station to be achieved through non-private car modes of transport. This should include:
  - Tram extension to HS2 station which should be high level access and complete prior to the opening of the station. It should be designed in such a way as to allow for its potential expansion to Long Eaton, Derby and East Midlands Airport. This will need to include a bridge over the station of sufficient size to accommodate different modes of transport which in addition to the tram would be bus, car, cycle and pedestrian.
  - Safe and attractive pedestrian and cycling links between new and existing communities including Toton, Long Eaton, Stapleford and Sandiacre utilising attractive routes though the location to the HS2 hub and neighbouring areas.
- A hierarchy of attractive routes and interconnected places should be created. Green routes should be provided and, where necessary, preserved and enhanced to assist with this including the Erewash Valley/Canal and additional green space to the north of existing settlements at Toton and Chilwell and to the south of Stapleford.
- Pedestrian access should be provided to the station from the east with an additional secondary western access. This should include a safe route either over or under the station.
- In terms of cycling provision, development should be compatible with future north-south and east-west segregated cycle routes. Cycling should be made a viable option for accessing the hub from within a five mile radius. NET extensions should incorporate a tram-side shared path (to extend to Derby if the tram is extended this far).
- Bessell Lane should be incorporated in plans to access the station and significant improvements will need to be made to the quality of the public realm to encourage better connections to Stapleford Town Centre and to assure the quality of the cycling provision on this north-south route including extension of Midland Street, Long Eaton. On a wider scale the plan to open Bennerley Viaduct should be taken into account with its potential to create wider major leisure routes attracting visitors to use Toton Hub as a starting point for cycling tours. A link should be provided to national cycle route 6 along the Erewash Canal directly to the HS2 Hub station and cycle storage should be provided at the station.
- Private vehicle access to the station to be provided via the A52, terminating in ideally underground parking or failing this a multi-storey car park to serve the station.

All policies should be read in conjunction with the Local Plan Part 1 – Broxtowe Borough Aligned Core Strategy. No policy should be applied in isolation; account will be taken of all relevant policies.



- Good quality transport links from the HS2 station to nearby town centres including a north/south link road to provide local vehicle, walking and cycling access to the station and to facilitate through bus services.
- Onward rail service connections to other principal East Midlands Stations including Ilkeston Station.
- Prevent overspill parking in existing residential areas when the station is operational. This may include Toton to become 'residents only parking' area to mitigate issues with Station/Tram traffic.

### **Green Infrastructure**

- Extensive multi-purpose interconnected Green Infrastructure routes to be provided to connect areas of growth and existing communities all of which should be of sufficient width and quality to provide attractive and usable links in the following locations:
  - Along the southern boundary of the location north of existing communities of Toton and Chilwell, between Hobgoblin Wood in the east and Toton Fields Local Wildlife Site in the west, this will be a significant corridor in the area, and should incorporate both pedestrian and cycle access to HS2 station;
  - Along the northern boundary of the location south of Stapleford this should comprise a narrow, graded tree and shrub roadside corridor to improve screening of the Innovation Village from the A52;
  - Along the Erewash Canal to the west of the location (incorporating flood mitigation on the low lying Sidings part of the site) and Erewash River (between Toton Washlands and Stapleford);
  - Along a north/south corridor immediately to the west of Toton towards Bessell Lane.
- A new primary route through the centre of the location linking development areas to the HS2 Hub linking to a high quality 'station square' as part of a new attractive principal pedestrian route.
- No loss of trees which are the subject of Tree Preservation Orders and extensive additional planting to be undertaken at appropriate locations to enhance provision of wildlife corridors of varying widths.
- Multi use sporting provision should be provided in appropriate locations ideally adjacent to the school for use by school children and others.

### **Economic development**

- The creation of an innovation village as part of a mixed use development to provide significant numbers of new high skilled jobs to drive economic development in the immediate area and the wider region.
- The provision of iconic tall buildings in close proximity to the station and on the western edge of the higher land further west. This is to provide suitable premises for economic ambitions to be met in a flexible format to allow for, and encourage, a mix of uses and also to provide a visual link to the northern gateway of the site leading to Stapleford District Centre and in doing so encourage additional investment in, and enhancements to, Stapleford District Centre.
- This development may include large scale conferencing facilities, university research/development provision, possible potential for hotels and other high tech developments seeking premises in proximity to a HS2 station.

### **School / Leisure**

- Option to provide space on the eastern side of Toton Lane for a 'South Broxtowe Leisure Hub', if required. This would include a new Leisure Centre

and associated indoor and outdoor facilities and a relocated GSA School campus.

#### **Land Assembly**

- Provide a School site of sufficient scale to accommodate the full educational needs of 3 to 18 year olds at George Spencer Academy within the strategic location and potentially as part of a school/Leisure hub on the eastern side of Toton/ Stapleford Lane.
- Relocate the plant nursery, electricity substation, sewage works and Network Rail/ DB Schenker off site.

### **Key Development Aspirations;**

1. The relocation of the electricity substation and sewage works to ensure a more comprehensive and high quality development.

### **Justification**

**3.11** There has been extensive work and consultation in relation to development in this location over several years. The Local Plan Policy now defines the area to be removed from the Green Belt as the site. This is shown in the plan on page 38.

**3.12** On 15 December 2015 the Broxtowe Cabinet resolved;

- The amount, location mix and site boundaries of development to be put forward as a site specific allocation to be progressed as part of the Broxtowe Part 2 Local Plan.
- The content of this (Cabinet) report, together with relevant background information previously reported to the June and July 2015 HS2 Toton Advisory Committees, is published as an interim policy framework to aid decision takers for this strategic location prior to the adoption of the Broxtowe Part 2 Local Plan Vision.

### **Vision**

**3.13** The vision for the site is:

- Planned development that uses the locational advantages of the hub station to strengthen and reinforce the roles of existing settlements across the East Midlands.
- Establishment of a major new high tech research/institute adjacent to the hub station which adds value to the existing East Midlands offer.
- Well-integrated high quality mixed tenure housing and employment development (including provision for relocated businesses), which makes best use of the land around the hub station and reflects the policy and aspirations in the Aligned Core Strategy.
- The avoidance of major retail development that would undermine the role of existing centres.
- Maintenance of the integrity of the Derby-Nottingham Green Belt west of the M1.
- Continuing to invest in infrastructure elsewhere that supports the roles of existing settlements.

**3.14** This can be delivered by an “innovation village” concept adjacent to the station within a flexible framework of interconnected transport and green infrastructure connections. The more detailed aspirations for discussion are given below and these follow from consultation work as part of the [Aligned Core Strategy](#) and beyond, work on the emerging East Midlands Growth Strategy and includes more recent discussions with representatives of the Chetwynd Neighbourhood Forum.

Reference Number	Details of amendment	Reason for Change
MM3	<p><b>Policy 3.2: Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)</b></p> <p><b>Key Development Requirements <del>within the plan period</del> between 2018 - 2023</b></p> <ul style="list-style-type: none"> <li>• 500 Homes of a minimum net density of 40 dwellings to the hectare and associated infrastructure to deliver this-, <del>these should be located towards the South of the Strategic Location for Growth.</del></li> <li>• Limited local retail provision of a scale that does not compete with the retail offer in nearby centres including Long Eaton, Stapleford and Sandiacre.</li> <li>• <del>Development should be located and designed to complement and not prejudice proposals for access to the HS2 Hub Station and Innovation Village which is to be delivered beyond the plan period.</del></li> <li>• <del>Highway infrastructure must be considered in conjunction with requirements for the Chetwynd Barracks allocation (Policy 3.1) and wider area as progressed through the Gateway Study and transport modelling.</del></li> </ul> <p><b>Key Development Requirements <del>beyond the plan period</del> for the Strategic Location for Growth stretching significantly beyond the end of this Part 2 Local Plan</b></p> <p>The development of an innovation village comprising the following minimum and to be confirmed as part of the review of the Greater Nottingham Aligned Core Strategies:</p> <ul style="list-style-type: none"> <li>• <del>Minimum of 18,000 square metres of B class employment space towards the western side of the site around the hub station. This development will be provided as part of a mix of uses including tall buildings along the key north/south gateway between the HS2 Station and Stapleford.</del></li> <li>• <del>Minimum of 16ha Open Space, to incorporate Green Infrastructure of sufficient width and quality to provide attractive and usable links between Hobgoblin Wood in the east and Toton Fields Local Wildlife Site in the west and the Erewash Canal, which will blend with a high quality built environment in line with the 'Trent Valley Vision'.</del></li> <li>• <del>An integrated local transport system that facilitates access enhancements to the station from the two gateway towns of Long Eaton to the south (in Erewash Borough) and Stapleford to the north.</del></li> <li>• <del>Safeguarded route for a NET tram extension and vehicular access to the HS2 station (including access from the A52).</del></li> </ul>	<p><b>Amendment:</b></p> <p>Key Development Requirement titles amended to be more specific about timescales of expected delivery.</p> <p>Inclusion of the requirement for the housing to be delivered towards the South of the Strategic Location for Growth so as to bring the policy in line with the Growth Strategy.</p> <p>Inclusion of the expectation that development should not prejudice the proposals for access to HS2 and Innovation Village as this is expected beyond 2028 and it is important that work being progressed now is not constrained by development as a result of representations made by Nottinghamshire County Council.</p> <p>Inclusion of the requirement to ensure that highways infrastructure is considered in a comprehensive manner included as a result of representations made by Nottinghamshire County Council and local residents.</p> <p>Previous supporting text has been moved into the policy and duplication has been removed. 'Aspiration' has been removed throughout this as it is now policy.</p>

# Beyond the Plan Period

## Policy 3.2: Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)

### Strategic policy context

- [Aligned Core Strategy Policy 2: The Spatial Strategy](#)
- [Policy 4: Employment Provision and Economic Development](#)
- [Policy 15: Transport Infrastructure Priorities](#)
- [Policy 16: Green Infrastructure, Parks and Open Space](#)

### What the Aligned Core Strategy says

Policy 2.3a iii) allocates a strategic location for growth on land east and west of Toton Lane including Toton Sidings in the vicinity of the proposed HS2 station at Toton, in Broxtowe. [The note to Policy 2.3 confirms that as a strategic location for growth, it will be allocated through the Part 2 Local Plan.](#) ~~The plan specifies that the allocation should~~ The ACS specifies that the strategic location for growth will include a minimum of 500 homes with the appropriate mix of this and other development to be determined in the ~~p~~Part 2 ~~l~~Local ~~p~~Plan.

Policy 4e confirms that significant new employment development will take place at land in the vicinity of the proposed HS2 station at Toton, in Broxtowe. The supporting text to this policy (at paragraph 3.4.6) specifies that development within the vicinity of the HS2 Station at Toton will include a minimum provision of 18,000 square metres of B Class employment floor space. There is evidence that this employment element of development in this location will prove more attractive to the market in the later years of the plan period and quite possibly beyond 2028 when the Station is operational.

Policy 15.7 confirms that any development permitted in or adjacent to the proposed strategic location for growth at Toton shall allow for adequate provision for the construction of the HS2 route, the station, vehicle access to it and an extension of the NET route which as a minimum shall be to the station and which shall also allow for its potential future extension to Erewash Borough. The supporting text (at paragraph 3.15.2) states that in the unlikely event of the Government not proceeding with the HS2 station at Toton, then the development specified under Policy 15.7 will not be required but a future extension to the tram route into Erewash Borough should not be prejudiced, subject to technical and financial feasibility, and the support of the relevant transport and planning authorities.

Policy 16 supporting text (at paragraph 3.16.9) states, with reference to a strategic approach to Green Infrastructure, that this will include a minimum of 16 hectares of Green Infrastructure on land at the strategic location for growth in the vicinity of the proposed HS2 station in Broxtowe.

Policy: 3.2 title moved up to top of page

**3.20** Delivery of development on the site will continue beyond the plan period. The Key Development Requirements, as set out below, relate in part to ~~the first 5 years of the Local Plan~~ [development proposals which are expected to come forward within the plan period](#), but also to the site as a whole and are required to ensure that the site is treated as one entity

and that a comprehensive and cohesive development is achieved to ensure that future development opportunities are not compromised. For ~~early phases of development~~ which comes forward within the plan period, it is essential to ensure that the form of development is consistent with wider development opportunities in order to secure a high quality sense of place facilitating further development opportunities at the point that the HS2 station is open to passengers.

~~3.44~~ **3.21** The following ~~site is allocated for mixed use development, as shown on the Policies Map:~~ Key Development Requirements must be met.

- ~~Policy: 3.2 Land in the vicinity of the HS2 Station at Toton~~

### Key Development Requirements within the plan period

**A.** Land allocated at Toton Strategic Location for Growth will be brought forward for the following development within the plan period. Development proposals will be required to be in general conformity with the Toton Strategic Location for Growth Illustrative Concept Framework (shown on Map 8).

- Between 500 and 800 ~~H~~homes ~~of a minimum net density of 40 dwellings to the hectare and associated infrastructure to deliver this~~, (with an overall capacity of around 3,000 homes) which should be located at the south of the Strategic Location for Growth as identified on the Toton Strategic Location for Growth Illustrative Concept Framework (Map 8).
- Development proposals should comprise a blended density taking into account adjacent development (existing and proposed), topography and avoiding an inefficient use of land.
- Minimum of 18,000 square metres for mixed employment (B Use Classes) to support realisation of an Innovation Campus and provide high skilled jobs to support economic growth in the immediate area and wider region.
- Limited ~~local~~ neighbourhood retail and community facilities (including health and education) ~~provision~~ of a scale that is proportionate to development to be delivered within the plan period and that does not compete with the retail offer in nearby centres including Long Eaton, Stapleford and Sandiacre.
- Provision of a multi-functional green infrastructure corridor to the south of the area including along the southern boundary that provides safe and convenient pedestrian and cycle access between the HS2 station, Toton Fields Local Wildlife Site and Hobgoblin Wood within the Chetwynd Barracks (site allocation 3.1). This will be a significant corridor in the area.
- Undergrounding of the high voltage electricity cables at the south of the site.
- Development should be located and designed to complement and not prejudice proposals for access to the HS2 Hub Station and further build-out of the Innovation Campus which is to be delivered beyond the plan period.
- Highway infrastructure must be considered in conjunction with requirements for the Chetwynd Barracks allocation (Policy 3.1) and wider area as progressed through the Gateway Study and transport modelling.

### Key Development Requirements beyond the end of the plan period as per submission version

~~The development of an innovation village comprising the following minimum and to be confirmed as part of the review of the Greater Nottingham Aligned Core Strategies:~~

All policies should be read in conjunction with the Part 1 Local Plan ~~Part 4~~ – Broxtowe Borough Aligned Core Strategy. No policy should be applied in isolation; account will be taken of all relevant policies.



- ~~Minimum of 18,000 square metres of B-class employment space towards the western side of the site around the hub station. This development will be provided as part of a mix of uses including tall buildings along the key north/south gateway between the HS2 Station and Stapleford.~~
- ~~Minimum of 16ha Open Space, to incorporate Green Infrastructure of sufficient width and quality to provide attractive and usable links between Hobgoblin Wood in the east and Toton Fields Local Wildlife Site in the west and the Erewash Canal, which will blend with a high quality built environment in line with the 'Trent Valley Vision'.~~
- ~~An integrated local transport system that facilitates access enhancements to the station from the two gateway towns of Long Eaton to the south (in Erewash Borough) and Stapleford to the north.~~
- ~~Safeguarded route for a NET tram extension and vehicular access to the HS2 station (including access from the A52).~~
- ~~Tram extension to terminate at a level which facilitates the future tram extension beyond the station.~~
- ~~An integrated traffic system that flows well including proper consideration of access both from Long Eaton and Stapleford.~~
- ~~Additional land for community facilities including education, a medical facility (to be provided in conjunction with the Chetwynd Barracks allocation) and the provision of a Leisure Centre (if required).~~

### Strategic Masterplan

**B.** A Strategic Masterplan must be prepared for development expected to be delivered beyond the plan period at Toton Strategic Location for Growth and approved by Broxtowe Borough Council as the Local Planning Authority by December 2020. The Strategic Masterplan should:

- incorporate and demonstrate how the requirements set out in Part D of this policy have been complied with; and
- be consistent with the development proposals set out in Part A of this policy and illustrated in the framework (Map 8).

**C.** Development proposals expected to be delivered beyond the plan period will be required to be in general conformity with the Strategic Masterplan.

### Key Development Requirements to be subject to the Strategic Masterplan

**D.** Land allocated at Toton Strategic Location for Growth is expected to be brought forward for the following development, on a phased basis, to achieve a comprehensive, high quality development. The precise type, quantum and form of development including infrastructure will be subject to further assessment as part of the preparation of the Strategic Masterplan and future revisions to the Infrastructure Delivery Plan.

### Community Provision

#### ~~3b.5 Aspirations:~~

- Provide space for provision of an expanded or **potentially** relocated George Spencer Academy including a new Primary School.
  - Provide space for provision of a relocated Leisure hub with space for a Leisure **e**Centre including indoor sports centre and 25m swimming pool and outdoor sports pitches .
- ~~Provide a new community centre.~~



## BRIEFING PAPER

Number CBP 8071, 11 September 2018

# High Speed 2 (HS2) Phase 2b and beyond

By Louise Butcher

### Contents:

1. What is HS2?
2. Costs
3. Compensation
4. Route development for Phase 2b
5. Northern Powerhouse Rail (NPR)
6. High speed rail and Scotland



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## Summary

This paper provides general information on the proposed high-speed rail line between London and the North of England (HS2). It gives a brief overview of the scheme, its costs, compensation arrangements and development of the Phase 2b scheme to the North of England. It also discusses Northern Powerhouse Rail, which is planned to integrate with HS2 in the North, and the development of high speed rail to and within Scotland.

HS2 is a proposed infrastructure project to build a high-speed rail line from London to Manchester and Leeds, via Birmingham, to begin operation in 2026 and be completed in 2033. It was supported by the Labour Government after 2009 and has had the support of the Conservatives in government since May 2010.

HS2 is planned to be delivered in three phases:

- **Phase 1** from London Euston to Birmingham Curzon Street and Lichfield with intermediate stations in West London (at old Oak Common) and at Birmingham Airport;
- **Phase 2a** from the West Midlands to Crewe; and
- **Phase 2b** comprising an eastern leg from the West Midlands to Leeds New Lane with intermediate stations in the East Midlands and South Yorkshire; and a western leg from Crewe to Manchester with an intermediate station at Manchester Airport.

In total, the Government has estimated that the scheme will cost £55.7 billion in 2015 prices (including rolling stock).

Despite enjoying widespread support across all parties in Parliament the scheme remains controversial outside, with disagreements regarding the economic and environmental cases for the scheme. Many of those who will be directly affected by the construction of the route are concerned for the future. The scheme has passionate supporters and opponents who, for the past seven or eight years, have argued across a variety of fora, including Parliament, as to whether the scheme would deliver enough in the way of benefits to justify the price tag. These debates continue.

This paper deals with Phase 2b of the HS2 scheme from Crewe to Manchester and from the West Midlands to Leeds via Sheffield. In July 2017 the Government issued a consultation on the eastern leg rolling stock depot and announced decisions on route refinements for Phase 2b. The Bill for this part of the route is expected before the end of 2020.

This paper also looks at Northern Powerhouse Rail, which is planned to integrate with HS2 in the North of England, and the progress of high speed rail to and within Scotland.

Information on Phase 1 and Phase 2a of HS2 can be found in HC Library briefing papers [CBP 316](#) and [CBP 7082](#), respectively. General background information on the HS2 scheme can be found in [RP11/75](#).

Maps showing the Parliamentary constituencies through which HS2 runs can be found attached to the [landing page](#) for this paper.

Further briefings are available on the [Railways Topical Page](#) of the Parliament website.

# 1. What is HS2?

## 1.1 Policy background

HS2 is the Government's flagship transport infrastructure project to build a high-speed rail line from London to Manchester and Leeds, via Birmingham, the East Midlands, Sheffield and Crewe, to begin operation in 2026 and be completed by 2033. Thus far there have been two Acts of Parliament<sup>1</sup> and eight [Statutory Instruments](#) providing for the scheme, with a further Bill currently being considered by Parliament.

Supporters claim that the line is urgently needed to meet projected future demand; to tackle the capacity constraints on the West Coast Main Line; and to deliver wider economic and regional benefits. Opponents maintain that these claims are overstated; future demand and capacity requirements can be met via other, cheaper means; and that the ultimate costs of HS2 are far in excess of the official budget.

The scheme that became HS2 was floated separately by the three main parties in 2008-09. In January 2009 Geoff Hoon, then Transport Secretary in the Labour Government, set up HS2 Ltd. with the principal aim of advising the Secretary of State on the development of proposals for a new railway from London to the West Midlands and potentially beyond.<sup>2</sup> The scheme taken forwards from 2010 was based on the outcome of the work conducted for the Labour Government by HS2 Ltd. It was initially proposed by Labour in its March 2010 command paper and was taken up by the Conservative-led Coalition Government after it assumed office in May of the same year.<sup>3</sup>

In the May 2010 Coalition Agreement the new Government confirmed its decision to build the new line in two phases, due to "financial constraints".<sup>4</sup> It was later confirmed that Phase 1 would take the line from London to the West Midlands by 2026 while Phase 2 would take the line from the West Midlands to the north of England by 2032-33.<sup>5</sup>

It was not until January 2013 that a decision was taken as to the configuration of the route from Birmingham north to Manchester (via Crewe) and Leeds (via the East Midlands and Sheffield).<sup>6</sup> The Government ran a consultation on Phase 2 between July 2013 and January 2014.<sup>7</sup> In November 2015 the Government announced its intention to bring forward the route to Crewe (now called Phase 2a) before the remainder of the route to Manchester and Leeds (now called 2b). In November 2016 the Government announced its preferred Phase

More background information and discussion on the HS2 scheme can be found in HC Library briefing paper [RP11/75](#).

<sup>1</sup> [High Speed Rail \(Preparation\) Act 2013](#) and the [High Speed Rail \(London - West Midlands\) Act 2017](#)

<sup>2</sup> DfT, [The role and funding of High Speed Two Ltd.](#), 14 January 2009

<sup>3</sup> DfT, [High Speed Rail](#), Cm 7827, March 2010; and: DfT press notice, "[Proposed high speed rail network North of Birmingham confirmed](#)", 4 October 2010

<sup>4</sup> HMG, [The Coalition: Our Programme for Government](#), May 2010

<sup>5</sup> DfT, [High Speed Rail: Investing in Britain's Future – Consultation](#), February 2011, p16

<sup>6</sup> DfT, [High speed rail: investing in Britain's future – Phase Two: the route to Leeds, Manchester and Beyond](#), Cm 8508, January 2013; [detailed route maps](#) are available on the DfT archive website

<sup>7</sup> DfT, [High Speed Rail: investing in Britain's future – Consultation on the route from the West Midlands to Manchester, Leeds and beyond](#), July 2013

2b route from Crewe to Manchester and the West Midlands to Leeds.<sup>8</sup> In July 2017 it issued consultations on the Crewe hub and the eastern leg rolling stock depot; announced decisions on route refinements for Phase 2b and published the Bill for Phase 2a.<sup>9</sup>

Arguments for and against HS2 are based on competing ideas not only about what the country needs in terms of new or improved rail infrastructure, but about how (if needed at all) it should be delivered and what the benefits and costs are of the ideas put forward. The two sides fundamentally disagree with each other's interpretation of the 'facts and figures' about the scheme. A fuller statement of these arguments can be found in HC Library briefing papers [RP11/75](#) and [RP14/24](#).

## 1.2 Party views

Since the beginning of the project there has been a general consensus that without cross-party backing, the HS2 scheme would be difficult to get through Parliament and that the multi-year funding package and ongoing commitment in terms of resources would be hard to secure.

HS2 has been supported by the Conservatives, Labour and the Liberal Democrats since 2009, in government and opposition.<sup>10</sup> One should note, however, that the parties' proposals initially varied in terms of scope, route alignment and destinations.

In the 2010 Parliament there were MPs in the two main parties who disagreed with the scheme: 41 voted against the HS2 Phase 1 Bill in April 2014; most of these were Conservatives.<sup>11</sup> In the 2015 Parliament 42 MPs voted against the Bill at Third Reading; again these were mostly Conservatives but also included Labour MPs and representatives of smaller parties.<sup>12</sup> In the 2017 Parliament 12 MPs voted against the HS2 Phase 2a Bill at Second Reading.<sup>13</sup>

Support for HS2 remains the policy of the **Conservative** Government. There have been various press reports over the past couple of years indicating that the scheme may have some critics in the Cabinet, but this has not to date affected Party policy on the issue.<sup>14</sup>

<sup>8</sup> DfT press notice, "[HS2 route to the East Midlands, Leeds and Manchester set out by the government](#)", 15 November 2016

<sup>9</sup> All available at: DfT, [HS2: high speed rail](#) [accessed 3 August 2017]

<sup>10</sup> DfT, [Britain's transport infrastructure: High Speed Two](#), January 2009; Conservative Party, [Conservative rail review: getting the best for passengers](#), February 2009; and: Liberal Democrats, [Fast track Britain: Building a transport system for the 21<sup>st</sup> century](#) (policy paper 85), June 2008

<sup>11</sup> [HC Deb 28 April 2014, cc666-9](#)

<sup>12</sup> [HC Deb 23 March 2016, cc1676-9](#)

<sup>13</sup> [HC Deb 30 January 2018, Division 109](#)

<sup>14</sup> e.g. "PM May will consider scrapping £56billion HS2 in Tory manifesto", *The Express*, 23 April 2017; "[Gove floats scrapping HS2 because he believes it to be a policy with a growing appeal](#)", *Conservative Home*, 2 July 2018; and "[PETER OBORNE: I fear a new cabinet war is looming - over £100 billion HS2 pipe dream](#)", *Daily Mail*, 25 August 2018

After 2010 there was some uncertainty about **Labour's** position on HS2.<sup>15</sup> This uncertainty persisted for a short while after Jeremy Corbyn became Leader of the Labour Party, and particularly with his appointment of John McDonnell as Shadow Chancellor – he voted against the Bill at Second Reading, for reasons related to his constituency in West London.<sup>16</sup> However, the then Shadow Transport Secretary, Lilian Greenwood, said in her September 2015 speech to the Labour Conference: “let’s invest in high speed rail – and let’s make sure it can be run under public ownership, as a public service: an integrated national asset that the country can be proud of”.<sup>17</sup> At the 2017 General Election Labour stood on a manifesto to complete HS2 and extend it to Scotland.<sup>18</sup>

The **Scottish National Party (SNP)** generally supports HS2 but is focused on its extension to and benefits for Scotland. The 2015 Spending Review confirmed that Scotland would receive Barnett consequential for HS2.<sup>19</sup> Following reports in March 2016 Transport Scotland, the DfT, HS2 and Network Rail began work on how to best leverage HS2 benefits for Scotland.<sup>20</sup> The SNP manifesto for the 2017 General Election said that: “Connecting Scotland to HS2 must be a priority, with construction beginning in Scotland as well as England, and a high speed connection between Glasgow, Edinburgh and the north of England as part of any high-speed rail network”.<sup>21</sup>

The **Liberal Democrats** supported HS2 in government between 2010 and 2015. The party’s manifesto for the 2017 General Election included a commitment to “proceed with HS2, HS3 and Crossrail 2, including development of a high-speed network stretching to Scotland”.<sup>22</sup>

**Plaid Cymru** is generally opposed to HS2 unless benefits can be secured for Wales.<sup>23</sup> The party’s manifesto for the 2017 General Election stated that Wales’ “public transport system is not fit for purpose. All of this while England benefits from next-generation trains

<sup>15</sup> e.g. “[The Labour Party cannot – and will not – give the Government a blank cheque for HS2](#)”, *LabourList*, 27 October 2013; “[Labour Party conference: Future of HS2 in doubt as Ed Balls warns of veto](#)”, *The Independent*, 23 September 2013; BBC, [The Andrew Marr Show Interview: Ed Balls MP – transcript](#), 16 March 2014; [HC Deb 23 January 2015, c508](#); and “[Commuters north and south deserve rail fit for purpose](#)”, *ASLEF Journal*, February 2015, p4

<sup>16</sup> [HC Deb 28 April 2014, cc633-5](#)

<sup>17</sup> [Lilian Greenwood, speech to Labour Conference](#), 29 September 2015; Ms Greenwood is now Chair of the all-party Transport Select Committee

<sup>18</sup> Labour Party, [For the Many Not the Few: The Labour Party Manifesto 2017](#), May 2017, p11

<sup>19</sup> HMT, [Statement of funding policy: funding the Scottish Parliament, National Assembly for Wales and Northern Ireland Assembly](#), November 2015, Table C.16, p64

<sup>20</sup> for further information, see: Transport Scotland, [High Speed Rail](#) [accessed 5 September 2018]

<sup>21</sup> SNP, [Stronger for Scotland](#), May 2017, p20

<sup>22</sup> Liberal Democrats, [Change Britain's Future: Liberal Democrat Manifesto 2017](#), May 2017, p62

<sup>23</sup> e.g. [NDM5505](#), 14 May 2014, Rhun ap Iorwerth AM; Plaid Cymru press notice, “[Devolved administrations should unite on HS2](#)”, 11 June 2015; and “[Further push to get Wales bigger share of HS2 cash](#)”, *BBC News*, 10 December 2015

and high-speed rail links costing £56 billion” and pledged to “press for our fair share of UK infrastructure spend”.<sup>24</sup>

The **Green Party** opposes HS2 on environmental grounds and what it believes will be a further skewing of the economy to London.<sup>25</sup> The party’s manifesto for the 2017 General Election pledged to: “Invest in regional rail links and electrification of existing rail lines, especially in the South West and North of England, rather than wasting money on HS2 and the national major roads programme”.<sup>26</sup>

**UKIP** has long opposed HS2<sup>27</sup> and called for it to be scrapped in the party’s 2017 General Election manifesto.<sup>28</sup>

### 1.3 Brexit

There is no reason why Brexit in and of itself should have a significant impact on HS2. There has been some debate in the past about how far the EU [Technical Standards of Interoperability \(TSIs\)](#) help or hinder HS2 construction (e.g. as regards platform heights).<sup>29</sup> HS2 is also intended to be built to accommodate EU ‘GC gauge’.<sup>30</sup> The Government’s Brexit White Paper, published in July 2018, does not state specifically what the UK’s plans are for the TSIs and other aspects of EU rail legislation post-Brexit. But it does state:

... the UK will have the flexibility to shape its own domestic railway legislation to meet the needs of its passengers and freight shippers, and reflect the unique characteristics of the rail network within the UK.<sup>31</sup>

This may indicate an intention to begin disapplying the TSIs, but this is as yet unclear.

The Government had hoped to secure some EU funding for the project. In 2015 the Government secured €39.2 million for ground investigation works for Phase 1 (London to the West Midlands), to be delivered between 2015 and 2019.<sup>32</sup> The funding comes from the Connecting Europe Facility (CEF). To put it simply, the CEF is the funding instrument for EU transport infrastructure policy, basically supporting the [Trans-European Transport Network \(TEN-T\)](#). HS2 has been included in the TEN-T programme since early planning stages. The EU has made it clear that the UK will no longer be eligible for CEF once it leaves and is planning to legislate to this effect.

<sup>24</sup> Plaid Cymru, [Action Plan 2017](#), May 2017, p19

<sup>25</sup> “Voters want ‘big changes’ - and only the Greens can deliver, says party leader Natalie Bennett”, *Birmingham Post*, 14 August 2014; and “High speed rail could be so much better”, *Guardian blog*, 4 March 2011

<sup>26</sup> Green Party, [The Green Party for a Confident and Caring Britain](#), May 2017, p23

<sup>27</sup> See, e.g. “Nigel Farage: ‘Skint’ Britain cannot afford HS2”, *The Daily Telegraph*, 25 January 2014

<sup>28</sup> UKIP, [Britain Together: UKIP 2017 Manifesto](#), May 2017, p50

<sup>29</sup> [HL Deb 10 November 2015, HL 3171](#) and [this FOI response from late 2016](#)

<sup>30</sup> Section 6 of the [Review of the Technical Specification for High Speed Rail in the UK](#), published in January 2012, explains the decision; see also [HC Deb 1 February 2013, c1011W](#) and [HL Deb 28 October 2015, c4](#)

<sup>31</sup> HMG, [The future relationship between the United Kingdom and the European Union](#), Cm 9593, July 2018, para 136

<sup>32</sup> [HC WPO 31957](#), 24 March 2016

The €39.2 million represents half of the cost of ground investigation works along Phase 1. Roughly, at the current exchange rate, the EU contribution is worth about £35.5 million – a tiny proportion of the estimated £27.2 billion cost of Phase 1.

Further funding would now be unlikely. However, this would only ever have represented a small percentage of overall costs – EU contributions to previous high-speed rail projects via the TEN-T stream have equated to between four and six per cent of the overall cost.<sup>33</sup>

## 1.4 HS2 Ltd.

As indicated above, in 2009 the Labour Government set up HS2 Ltd. to advise the Secretary of State on the development of its HS2 proposals.

HS2 Ltd. describes itself as “the company responsible for developing and promoting the UK’s new high speed rail network”. It is an executive non-departmental public body, sponsored by the Department for Transport and funded by grant-in-aid from the Government. It has almost 1,500 employees who are mostly based in Birmingham.<sup>34</sup>

HS2 Ltd.’s annual reports and accounts and annual expenditure reports are available on their [website](#).

### Non-departmental public bodies

A non-departmental public body (NDPB) is a “body which has a role in the processes of national government, but is not a government department or part of one, and which accordingly operates to a greater or lesser extent at arm’s length from ministers”.

NDPBs have different roles, including those that advise ministers and others which carry out executive or regulatory functions, and they work within a strategic framework set by ministers.<sup>35</sup>

DfT and HS2 Ltd. have signed a Development Agreement and a Framework Document:

- The 2017 HS2 **Development Agreement** governs the relationship between the Secretary of State for Transport and HS2 Ltd. for the delivery of the HS2 project. It sets out HS2 Ltd.’s role in developing, building and operating the new railway and the DfT’s role as sponsor and funder;<sup>36</sup> and
- The 2018 **Framework Document** deals with matters relating to HS2 Ltd., the Secretary of State for Transport’s role as shareholder of the company, the company’s relationship with the department, and accountabilities and governance.<sup>37</sup>

HS2 Ltd.’s Chairman is Sir Terry Morgan, the former Chairman of Crossrail Ltd. and Chairman of Ricardo plc. Its current chief executive is Mark Thurston.<sup>38</sup>

<sup>33</sup> DfT, *HS2: Outline Business Case - Section 4: Financial Case*, March 2014, para 78

<sup>34</sup> HS2 Ltd., *About us* [accessed 6 September 2018]

<sup>35</sup> Cabinet Office, *Public bodies transformation programme*, 27 April 2016

<sup>36</sup> *Development Agreement between the Secretary of State for Transport and HS2 Ltd relating to the High Speed Two project*, 17 July 2017

<sup>37</sup> *Framework document between the Secretary of State for Transport and High Speed 2 Limited*, 23 May 2018

<sup>38</sup> HS2 Ltd., *Our governance* [accessed 6 September 2018]



There have been a series of issues related to various aspects of HS2's operations, which have been reported in the press and discussed in Parliament. The most high-profile are:

- **HS2 Ltd. remuneration:** Following reports in 2015 and 2016 about the levels of executive remuneration at HS2 Ltd.,<sup>39</sup> in August 2018 *The Times* ran an investigation piece on the back of an FOI request looking in more depth at the issue. It found that about a quarter of HS2 Ltd.'s staff received remuneration in excess of £100,000 in 2017/18 (including pension contributions). HS2 Ltd.'s chief executive Mark Thurston, who joined the company in March 2017, received total remuneration in 2017/18 of £601,979.<sup>40</sup>
- **HS2 Ltd. redundancy payments:** The issue of HS2 Ltd. making unauthorised redundancy payments to staff emerged in Summer 2017 with the qualification by the Comptroller and Auditor General of HS2 Ltd.'s accounts.<sup>41</sup> The Public Accounts Committee subsequently produced a critical Report into the Accounts.<sup>42</sup> The Government's response, published in a Treasury Minute of March 2018, stated that it agreed with all of the Committee's recommendations and that new governance and training was in place to prevent a recurrence.<sup>43</sup> Dame Cheryl Gillan established with a WPQ in January 2018 that the overpayments would have to be absorbed by HS2's existing budget.<sup>44</sup>
- **HS2 Ltd. overspends:** In June 2018 *The Sunday Times* reported that Doug Thornton, a whistleblower who worked for HS2 Ltd. as head of property, had claimed that HS2 Ltd. staff had been pressured to "falsify figures, mislead parliament and cover up "petrifying" overspends" with regards to the budget for buying land and buildings.<sup>45</sup> This reportedly prompted the Transport Minister, Nusrat Ghani, to write to Mark Thurston to ask if he had "full confidence in the robustness of the numbers" provided by HS2 for its spending on land and property and to make clear that "no MP, select committee or DFT minister has been misled" over costs.<sup>46</sup>
- **CH2M and HS2 Ltd.:** As stated above, HS2 Ltd.'s current chief executive is Mark Thurston, who succeeded interim Chief

<sup>39</sup> e.g. "46 HS2 staff earn more than the prime minister's £150,000 salary", *Financial Times*, 24 November 2015; and [High Speed 2 Railway Line: Written question – 46394](#), 10 October 2016

<sup>40</sup> "Chris Grayling under fire for letting HS2 pay soar", *The Times*, 8 August 2018

<sup>41</sup> NAO press notice, "[Report of the Comptroller and Auditor General on the 2016-17 Accounts of High Speed Two \(HS2\) Limited](#)", 19 July 2017; the full Report is available on the [NAO website](#)

<sup>42</sup> PAC, [High Speed 2 Annual Report and Accounts](#) (Tenth Report of Session 2017–19), HC 454, 15 December 2017

<sup>43</sup> HMT, [Treasury Minutes: Government response to the Committee of Public Accounts on the Fourth to the Eleventh reports from Session 2017-19](#), Cm 9575, March 2018, pp26-28; a [letter](#) from the Permanent Secretary at DfT, Bernadette Kelly, stated that, having taken legal advice, there was no evidence of fraud or misfeasance in office on the part of then Chief Executive, Simon Kirby

<sup>44</sup> [High Speed Two: Redundancy Pay: Written question – 123162](#), 24 January 2018

<sup>45</sup> "HS2 'covered up petrifying overspends'", *The Sunday Times*, 17 June 2018

<sup>46</sup> "HS2 chief called to account over 'robustness' of budget", *Financial Times*, 20 June 2018; this letter does not appear to be in the public domain. An [FOI request](#) has been made to HS2 Ltd. for the letter and for Mr Thurston's response, due for answer by 25 September

## 10 High Speed 2 (HS2) Phase 2b and beyond

Executive Roy Hill in March 2017.<sup>47</sup> Both Mr Thurston and Mr Hill worked for the US engineering company [CH2M](#), which raised questions about conflicts of interest given the company's involvement in the HS2 project.<sup>48</sup> CH2M has also received millions of pounds from the taxpayer in its capacity as development and engineering delivery partner for HS2.<sup>49</sup> When CH2M withdrew from an HS2 contract in March 2017 this provoked further concerns.<sup>50</sup> In April 2017 the Transport Select Committee questioned the Secretary of State, Chris Grayling, and the then Chairman of HS2, Sir David Higgins, about the relationship between HS2 Ltd. and CH2M.<sup>51</sup>

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<sup>47</sup> HS2 Ltd. press notice, "[HS2 announces new CEO](#)", 26 January 2017

<sup>48</sup> [CH2M Hill: Written question – 63303](#), 9 February 2017

<sup>49</sup> *ibid.*

<sup>50</sup> "[HS2 scraps contract over conflict of interest claims](#)", *Financial Times*, 29 March 2017

<sup>51</sup> Transport Select Committee, [Oral evidence: HS2 - CH2M contract](#), HC 1140, 19 April 2017; it also published associated [written evidence](#)



## 2. Costs

### 2.1 Spending to date (financial year end 2018)

On 16 March 2018 the Minister stated that spending to 2016/17 on HS2 (since 2009) was £2.3 billion.<sup>52</sup>

The June 2018 HS2 Business Plan stated that spend in 2017/18 was about £1.8 billion.<sup>53</sup>

**Assuming no overlap between the two figures (which it is not possible to assume with certainty) this would equate to total spend to date of about £4.1 billion.**

The same Business Plan shows anticipated future spending of £12 billion out to 2020/21:

- £3.06 billion in 2018/19;
- £4.2 billion in 2019/20; and
- £4.82 billion in 2020/21.<sup>54</sup>

In the 2013 Queen's Speech the Government announced a 'paving bill' to authorise further spending on preparation for the HS2 project. The Bill was given Royal Assent on 21 November 2013 and became the [High Speed Rail \(Preparation\) Act 2013](#). It came into force on the same day.<sup>55</sup> Consequently, every year the Secretary of State for Transport has to lay before Parliament a report detailing HS2-related expenditure by HS2 Ltd. and the DfT. They tend to be laid before Parliament every October.

Because construction has yet to begin, most HS2 spending to date has been on compensating property owners. Other spending includes consultancy and legal fees.<sup>56</sup>

### 2.2 Infrastructure

At the time of the 2010 election both the Conservatives and Labour were estimating that a scheme from London to the North of England via the West Midlands (in whatever configuration) would cost £20 billion (of which £15.7 billion would come from the taxpayer) and £30 billion respectively.<sup>57</sup> By January 2012, with the broad route of the proposed scheme in place, the estimate had increased to £32.6 billion.<sup>58</sup> In June 2013 the Coalition Government announced a significant increase in the overall projected cost of HS2 to £42.6 billion.<sup>59</sup>

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<sup>52</sup> [High Speed 2 Railway Line: Written question – 131760](#), 16 March 2018

<sup>53</sup> HS2 Ltd., [Corporate Plan 2018 – 2021](#), 19 June 2018, p46

<sup>54</sup> *Ibid.*, pp46-7 [nominal prices]

<sup>55</sup> For further information see HC Library briefing paper [CBP 6624](#)

<sup>56</sup> See, e.g. [HC Deb 1 February 2013, c1007W](#); and: [HC DEP 2013-0221](#); [HC Deb 10 March 2014, cc61-3W](#); [High Speed Two: Legal Costs: Written question – 44231](#), 7 September 2016; and [CH2M Hill: Written question – 63303](#), 9 February 2017

<sup>57</sup> *op. cit.*, [Conservative rail review: getting the best for passengers](#), p11; and: [High Speed Rail](#), p141

<sup>58</sup> DfT, [Economic Case for HS2: Updated appraisal of transport user benefits and wider economic benefits - A report to Government by HS2 Ltd](#), January 2012, pp33-34

<sup>59</sup> [HC Deb 26 June 2013, c343](#)

In November 2015 the Government updated the HS2 cost figures to 2015 prices, putting the total cost of the project, including rolling stock, at £55.7 billion (£50.1 billion in 2011 prices). The Government said that this did not represent a budget increase, but an adjustment for inflation.<sup>60</sup> The **funding for Phase 2a, as set out in the Explanatory Notes to the HS2 Phase 2a Bill is £3.48 billion** (see section 5, below).<sup>61</sup>

This follows a number of reports over recent years indicating that the final cost of HS2 may be much higher than currently projected by HS2 Ltd. and the Government. One of those most frequently cited on this is infrastructure consultant Michael Byng, who created the method used by Network Rail to cost its projects. He has estimated that the costs of HS2 are likely to be almost double the existing figure. The Government does not agree with this assessment.<sup>62</sup> In addition, there were reports in July 2018 of a 'secret' report by Paul Mansell, one of a number of reviewers used by the Infrastructure Projects Authority (IPA – see below), which stated that HS2 was "highly likely" to go as much as 60% over budget and cost "more than £80bn".<sup>63</sup>

There was a debate on these various claims in the House of Lords on 24 July on a starred question by Lord Berkeley. The minister, Baroness Sugg, said that HS2 "does not recognise or agree with either the analysis or the figure it contains".<sup>64</sup>

### 2.3 Trains

The funding envelope for the rolling stock to serve the whole HS2 route, in 2015 prices with contingency, is £7 billion.<sup>65</sup> This reflects the 'central estimate' cost in 2011 prices of £6.93 billion (revised down from the previous estimate of £7.5 billion largely due to changes in risk assumptions). The lower figure was used in the October 2013 revised economic case, though the Department stated that "it is also appropriate to retain the higher figure as a long-term fiscal provision, providing a higher level of certainty".<sup>66</sup>

There will be two types of rolling stock: captive (used on HS2 only) and classic compatible (able to run off the HSR track onto the conventional railway). The revised costs refer only to 200 metre units (trains); the 260 metre units, which were previously envisaged to run on the full Y network once Phase 2 was open, were discarded in 2012.<sup>67</sup> In 2014 the Government said that the estimated cost:

... is likely to exceed current private sector financing market capacity. The largest individual Rolling Stock Company (RoSCo)

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<sup>60</sup> [High Speed 2 Railway Line: Written question - HL3816](#), 4 December 2015

<sup>61</sup> [Bill 006 EN 2017-19](#), para 482

<sup>62</sup> "[Labour peer suggests HS2 costs double what public is told](#)", *Transport Network*, 19 March 2018

<sup>63</sup> "[HS2 budget 'will balloon to £80bn', says secret report](#)", *The Times*, 22 July 2018

<sup>64</sup> [HL Deb 24 July 2018](#), cc1593-5

<sup>65</sup> [High Speed 2 Railway Line: Written question - HL4189](#), 21 December 2016

<sup>66</sup> op. cit., *The Economic Case for HS2*, pp74-5; and *HS2: Outline Business Case - Section 4: Financial Case*, paras 19-20

<sup>67</sup> HS2 Ltd. for the DfT, [HS2 cost and risk model report](#), March 2012, pp15-17; and: *ibid.*, para 16

financings have been less than £1bn, and the largest since 2008 has been around £300m. The £2.4bn IEP [InterCity Express Programme] financing was delivered through a structured Public Private Partnership (PPP) arrangement but included around £1bn [from the] Japanese Export Credit Agency. However, there may be potential to establish a government funded rolling stock company which could seek co-investors in due course.<sup>68</sup>

## 2.4 Value for money

As the anticipated costs of HS2 increased, the Benefit-Cost Ratio (BCR) fell. However, further projected cost savings and changes to appraisal methodology increased the BCR.<sup>69</sup>

Estimate to:	February 2011 <sup>70</sup>	October 2013 <sup>71</sup>	November 2016 <sup>72</sup>	July 2017 <sup>73</sup>
<i>BCR</i>				
Phase 1	1.6	1.4	n/c	n/c
(with WEIs)	(2.0)	(1.7)		
Phase 2	-	-	2.5	-
(with WEIs)			(3.1)	
Phase 2a	-	-	-	1.6
(with WEIs)				(1.9)
Phase 2b	-	-	-	2.1
(with WEIs)				(2.6)
Full Y network	2.2	1.8	2.1	1.9
(with WEIs)	(2.6)	(2.2)	(2.7)	(2.3)

According to the Government's guidance on value for money assessments:

- a BCR of 1.4 (Phase 1 without WEIs) would represent 'low' value for money;
- 1.9 (Full Y network without WEIs) would represent 'medium' vfm; and
- 2.6 (Phase 2b with WEIs) would represent 'high' vfm.<sup>74</sup>

<sup>68</sup> op. cit., [HS2: Outline Business Case - Section 4: Financial Case](#), para 95

<sup>69</sup> BCR is essentially the net monetised benefit divided by the net cost to Government

<sup>70</sup> HS2 Ltd., [Economic case for HS2: The Y network and London-West Midlands](#), February 2011, p12&p43

<sup>71</sup> op. cit., [The Economic Case for HS2](#), p85; and DfT, [High Speed Two: East and West: The next steps to Crewe and beyond](#), Cm 9157, 30 November 2015, para 2.50, p46

<sup>72</sup> DfT, [High Speed Two Phase 2b: Strategic Outline Business Case - Economic Case](#), 15 November 2016, p15

<sup>73</sup> DfT, [High Speed Two: Phase Two Economic Case](#), 17 July 2017, pp13, 16 & 26

<sup>74</sup> DfT, [Value for Money Assessments](#) [archived 11 August 2016]

The Government's October 2013 HS2 strategy paper gave the following reasons as to why the BCR had decreased:

The changes to the benefit-cost ratio compared to August 2012 are driven by the following factors. Upward influences on the benefit-cost ratio are associated with improvements in services through use of released capacity, including to towns such as Preston, York and Milton Keynes, and better evidence on travel patterns which mean we are now forecasting more business travellers on key routes served by HS2. These are offset by downward pressures on the benefit-cost ratio from factors such as increases in costs and the reduction in the value of business travel time savings.<sup>75</sup>

In effect, the factors that buoyed up the BCR were improvements in services through use of released capacity, and more business travellers using key routes served by HS2.<sup>76</sup>

The updated November 2016 financial case for Phase 2b said that the reason the BCR had increased from previous estimates was due to a number of updates to improve the modelling and appraisal framework.<sup>77</sup> The July 2017 economic case said that changes to the BCR since the November forecast had come about due to a wide range of issues such as model updates, assumptions about conventional rail, changes to the Phase 2b route alignment and changes to appraisal.<sup>78</sup>

In September 2013 the Government published a report by KPMG, which estimated that investment in HS2 could potentially generate £15 billion a year in productivity gains for the British economy in 2037 (2013 prices). This would represent an increase of around 0.8 per cent in the total level of GDP in 2037.<sup>79</sup> The methodology of the report was subsequently criticised and a later FOI request by the BBC resulted in the publication of the names of those areas that KPMG calculated would lose out from HS2.<sup>80</sup>

Another issue which often comes up in discussions of HS2's costs and whether it is value for money, is the 'opportunity cost', i.e. what else the money could be spent on.

In 2016 a group of transport academics and planners published a paper summarising the alternative studies that had been carried out, looking at how to achieve the stated benefits of HS2 for less money, dispersing works across the country.<sup>81</sup> There are others who argue that in light of

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<sup>75</sup> op. cit., [The Strategic Case for HS2](#), para 5.4.16 [page 105]; supplemental documents on the economic and financial cases were published in March 2014, see: DfT, [HS2: strategic case supporting information](#), 6 March 2014

<sup>76</sup> Mott MacDonald and MVA for HS2 Ltd, [The economic case for HS2: Summary of key changes to the Economic Case since August 2012](#), October 2013

<sup>77</sup> op cit., [High Speed Two Phase 2b: Strategic Outline Business Case - Economic Case](#), p5, for more detail see chapter 3

<sup>78</sup> op cit., [High Speed Two: Phase Two Economic Case](#), pp9-10

<sup>79</sup> KPMG for HS2 Ltd., [HS2 Regional Economic Impacts](#), Ref: HS2/074, September 2013, p13

<sup>80</sup> for criticism, see: Robert Peston: "[What KPMG ignored when arguing for HS2](#)", *BBC News*, 11 September 2013; and: Prof. Henry Overman: "[The Regional Economic Impacts of HS2](#)", *LSE SERC blog*, 13 September 2013; and for the FOI outcome, see: "[HS2 'losers' revealed as report shows potential impact](#)", *BBC News*, 19 October 2013

<sup>81</sup> May, Tyler et al., [HS2 and the railway network: the case for a review](#), May 2016

long term under investment in public transport in the North and recently cancelled or downgraded transport schemes in the region, that the case for the North needing HS2 is not proven and that the money would be better spent on swifter and more extensive transport upgrades across the region.<sup>82</sup> Supporters of HS2 argue that the Government is planning to invest in rail and roads across the North, so it is not a case of having to lose one to fund the other.<sup>83</sup>

Others argue that HS2 funding could be used to support housing or the NHS. Most recently *The Times*' Economics Editor, Philip Aldrick pointed to the 'symmetry' of a 3% increase in NHS spending for five or perhaps ten years costing about £4.7 billion more a year and the fact that from 2019, the Government "has set aside almost precisely the same amount for HS2, £4.8 billion annually".<sup>84</sup>

## 2.5 HS2 growth strategies

As well as bringing benefits to transport users, the government believes that high speed rail will bring benefits to the wider economy (Wider Economic Impacts or WEIs – see the bracketed figures in the table in section 2.4, above). Such benefits are to be achieved through: improved linkages between businesses (agglomeration impacts);<sup>85</sup> benefits to consumers of higher output (imperfect competition);<sup>86</sup> and to a much lesser extent, benefits to commuters (labour market impacts).<sup>87</sup> Most of the HS2 WEIs come from an enlarged labour market and greater commuting capacity.

One of the concerns about the WEIs is that they cannot be achieved by building HS2 alone and that they depend on further spending in local areas, not accounted for in the HS2 budget. The Chair of the National Infrastructure Commission, Sir John Armitt, seemed to support this argument. An August 2018 article in the *Sunday Telegraph* by Sir John set out his view that an extra £43 billion should be spent to "make the

<sup>82</sup> e.g. "[Andrew Vine: Scrap the waste of money that is HS2 and fix the North's rail services](#)", *Yorkshire Post*, 28 August 2018

<sup>83</sup> See, e.g. DfT press notice, "[Northern transport investment to help create thousands of jobs](#)", 25 June 2018

<sup>84</sup> "[We can stop NHS going off the rails, but who would dare make the call?](#)", *The Times*, 26 May 2018

<sup>85</sup> the government believe that HS2 will bring agglomeration impacts by shortening the journey time between cities, effectively bringing firms and markets closer together. This should enable firms to derive benefits from being closer together such as: enhanced knowledge sharing; staff specialisation; and enhanced competition between suppliers. The benefits to such firms support the wider economy of the area.

<sup>86</sup> where firms are located in markets of imperfect competition they retain some control over the price they charge. In such markets the value placed on additional production (the price) exceeds production costs. If better transport means that firms increase production, both the firm and consumer will be better off.

<sup>87</sup> transport improvements can lower the cost and time associated with travelling to work. This can increase a person's willingness to work in a similar way to an increase in wage might. In addition to this some benefit is captured in the moving of jobs to more productive areas.

most of the HS2 project” and that this spending was needed to prevent “inadequate public transport links” beyond the new line.<sup>88</sup>

In a June 2016 report the NAO highlighted the fact that the £55.7 billion funding package does not cover funding for all the activity needed to deliver the promised growth and regeneration benefits:

The funding covers the cost of building the railway and buying new trains and maintenance depots in order to deliver the capacity and connectivity benefits assessed in the economic case for High Speed 2. Local authorities, in partnership with others such as Local Enterprise Partnerships, are responsible for driving regeneration and local growth benefits, and there is a risk that these wider benefits will not materialise if funding cannot be secured.<sup>89</sup>

The Public Accounts Committee highlighted this issue in its September 2016 follow-up report and recommended that the Government “seek assurances from the relevant local authorities that they have plans in place to identify sources of funding and financing, to secure the local regeneration and growth benefits [of HS2]”.<sup>90</sup> In its response to the Committee, published in December 2016, the Government said that this work was ongoing as part of local authorities’ HS2 growth strategies and that it expected to see these in place by March 2018.<sup>91</sup>

In November 2017 the Government published a new HS2 policy paper, *HS2: Getting the best out of Britain*, which set out the regional strengths of highly skilled manufacturing clusters, universities and research centres, and cutting-edge technology entrepreneurs. It warned that more needed to be done to draw them together and “realise their full potential to the economy”.<sup>92</sup>

Greater Manchester, the East and West Midlands and Leeds have published their HS2 growth strategies.<sup>93</sup> Only one of these strategies contains costings: the West Midlands strategy estimates the total cost of its local growth plans for HS2 at £3.3 billion.<sup>94</sup> In the north, these growth strategies are designed to link up to the transport strategy being development by Transport for the North (see section 5.2, below).

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<sup>88</sup> Reported in: “[‘We should spend billions more to make most of HS2’](#)”, *The Times*, 6 August 2018

<sup>89</sup> NAO, *Progress with preparations for High Speed 2*, HC 235, 28 June 2016, p8, see also pp39-40

<sup>90</sup> PAC, *Progress with preparations for High Speed 2* (Fourteenth Report of Session 2016–17), HC 486, 14 September 2016, p6, recc. 5

<sup>91</sup> HMT, *Treasury Minutes: Government responses to the Committee of Public Accounts on the Thirty Ninth report from Session 2015-16: the Fourteenth to the Twenty First reports from Session 2016-17: and progress on Government Cash Management*, Cm 9389, December 2016, pp6-7

<sup>92</sup> DfT, *HS2: Getting the best out of Britain*, 30 November 2017, p3

<sup>93</sup> TfGM press notice, “[‘High-speed rail provides launch pad for growth in Greater Manchester and the North’](#)”, 16 March 2018; DfT press notice, “[‘Thousands of jobs and almost £4billion for economy detailed in HS2 Strategy’](#)”, 3 October 2017; WMCA, *Midlands HS2 Growth Strategy*, July 2015; and WYCA, *Leeds City Region HS2 Growth Strategy*, January 2018

<sup>94</sup> Ibid., *Midlands HS2 Growth Strategy*, p27

## 2.6 Comment

The cost of HS2 has been one of the key bones of contention between supporters and opponents of the scheme.<sup>95</sup>

One of the reasons it has taken on such importance is that the cost will largely fall on the taxpayer. Governments have consistently argued that 'some' funding could come from the private sector and from the EU: "... further contributions will be sought from certain businesses and developers directly benefitting from the project".<sup>96</sup> However, the Coalition Government acknowledged that "third party contributions could only ever deliver a small percentage of the core costs for HS2".<sup>97</sup>

That said, once the line is operational it is likely that the Government of the day will seek to recoup some of the construction costs by letting out a contract to operate the line. Such a contract is currently in place on HS1.<sup>98</sup> While the Department has "not decided at this stage" whether to let a similar concession for HS2,<sup>99</sup> "there is likely to be significant market capacity for an HS2 concession". The value of such a concession:

... will be determined largely by the level and certainty of access charge revenues, but the potential scale may be such that the delivery of finance may be best sought by letting two or even three separate concessions. An operating concession would mean government would still need to meet the up front capital costs of the project, and would also bear post construction defect risk. However, risk transfer could be structured to focus on those elements where the private sector can enhance efficiency (e.g. operating costs).<sup>100</sup>

More generally, successive Governments have maintained that HS2 is a good investment for the country, that it would stimulate growth (particularly in the regions) and have an overall positive impact on jobs and business.<sup>101</sup> Those opposed to HS2 disagree. They assert that it will not deliver jobs and growth; it is not value for money; it is not needed for capacity; and it blights homes.<sup>102</sup>

There have been a number of Parliamentary reports looking at the costs and benefits of HS2 since the firm plans for Phase 1 were published in 2011.

The Commons **Treasury Select Committee** published a report in October 2013 on the 2013 Spending Round and stated that the Treasury should not allow HS2 to proceed "until it is sure the cost-benefit analysis for HS2 has been updated to address fully the concerns

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<sup>95</sup> There have been a number of Parliamentary debates on the costs of HS2, see for example Second Reading of Christopher Chope's *HS2 Funding Referendum Bill* on [23 January 2015](#)

<sup>96</sup> [Bill 132 2013-14 - EN](#), para 505

<sup>97</sup> op. cit., [HS2: Outline Business Case - Section 4: Financial Case](#), para 62

<sup>98</sup> for details see section 3 of HC Library briefing paper [SN267](#)

<sup>99</sup> op. cit., [The Strategic Case for HS2](#), para 105, p37

<sup>100</sup> op. cit., [HS2: Outline Business Case - Section 4: Financial Case](#), para 94

<sup>101</sup> e.g. op. cit., [High speed rail: investing in Britain's future – Phase Two: the route to Leeds, Manchester and Beyond](#), p5

<sup>102</sup> e.g. HS2AA press notice, "[HS2AA responds to announcement of route for phase two of HS2](#)", 28 January 2013



raised by the National Audit Office” (see below); that the Treasury should publicly quantify the benefits for HS2 “not captured by the existing economic appraisal”; and that prior to any decision by the Treasury to proceed with HS2, it “should publish its own comprehensive economic case supporting its decision”.<sup>103</sup> The Government responded to the report in December 2013, pointing to the recently published Strategic Case and updated Economic Case for HS2 as a response to the Committee’s concerns.<sup>104</sup> The then Chairman of the Committee, Andrew (now Lord) Tyrie, wrote to the Transport Secretary on subsequent occasions, continuing to flag up concerns with the economic case.<sup>105</sup> The current chair, Nicky Morgan, does not [appear](#) to have written on this issue.

In addition to the report described in section 2.5, above, the **Public Accounts Committee**: published two reports in May 2013 and January 2015 on the back of reports by the National Audit Office (NAO). The 2013 report on preparations for HS2 estimated that there was a £3.3 billion funding gap over four years (2017-18 to 2020-21) which the Government had yet to decide how to fill. It criticised the Department for Transport for making decisions “based on fragile numbers, out-of-date data and assumptions which do not reflect real life” and having a large contingency that appeared “to be compensating for weak cost information”.<sup>106</sup> The 2015 report on major rail infrastructure programmes set out the Committee’s concern that ‘generous contingency funds’ could be used to hide cost overruns, and sought the Government’s assurance that this would not happen.<sup>107</sup>

The Lords **Economic Affairs Committee**: published a report in March 2015 posing a series of questions to the Government, and querying the cost-benefit analysis, particularly the values of non-work travel time savings that contribute significantly to the anticipated net benefits of the scheme.<sup>108</sup> The Government responded to the report in July 2015, generally dismissing the Committee’s concerns and asserting that “the case for HS2 is clear and robust” and “our appraisal techniques are world class”.<sup>109</sup> There followed an exchange of letters between the

<sup>103</sup> Treasury Committee, [Spending Round 2013](#) (third report of session 2013-14), HC 575, September 2013, para 67

<sup>104</sup> [Spending Round 2013: Government Response to the Committee's Third Report of Session 2013-14](#) (Third Special Report of session 2013-14), HC 932, December 2013, p11

<sup>105</sup> [Letter from Committee Chair to Transport Secretary](#), 14 September 2016 and [Letter to Chris Grayling MP, Secretary of State for Transport on the economic case for HS2](#), 4 January 2017

<sup>106</sup> PAC, [High Speed 2: A review of early programme preparation](#) (twenty-second report of session 2013-14), HC 478, 9 September 2013, p5 (based on NAO, [High Speed 2: A review of early programme preparation](#) (session 2013-14), HC 124, 16 May 2013)

<sup>107</sup> PAC, [Lessons from major rail infrastructure programmes](#) (twenty-eighth report of session 2014-15), HC 709, 12 January 2015, p5 (based on NAO, [Lessons from major rail infrastructure programmes](#) (session 2014-15), HC 267, 29 October 2014)

<sup>108</sup> Lords EAC, [The Economics of High Speed 2](#) (first report of session 2014-15), HL Paper 134, 25 March 2015

<sup>109</sup> [House of Lords Economic Affairs Committee: The Economics of HS2 Government Response](#), July 2015, p4 & p27



Committee and the Government on what the Chairman considered to be unanswered questions in the report.<sup>110</sup>

The Government's **Infrastructure and Projects Authority (IPA)** publishes annual reports with accompanying portfolio data, detailing the rating it has given to a number of transport projects.<sup>111</sup> HS2 has had an 'amber/red' rating, denoting that "successful delivery of the project is in doubt, with major risks or issues apparent in a number of key areas" and that "urgent action is needed to ensure these are addressed, and whether resolution is feasible" since 2013.<sup>112</sup>

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<sup>110</sup> see: [Economics of HS2: correspondence with Ministers](#) [accessed 14 February 2017]

<sup>111</sup> formerly the Major Projects Authority (MPA), which was combined with Infrastructure UK on 1 January 2016 to form the IPA, see: IPA, [About us](#) [accessed 6 September 2018]

<sup>112</sup> Cabinet Office, [The Major Projects Authority Annual Report](#), 24 May 2013, chapter 2; all the data is available on the [IPA website](#) [accessed 6 September 2018]

### 3. Compensation

**There is a guide to the available compensation schemes on the [Gov.uk website](#),<sup>113</sup> with information on eligibility and how to apply. In summary they are as follows:**

- In a safeguarded area: [Express Purchase Scheme](#) and [Need to Sell Scheme](#)
- In a rural support zone: [Cash Offer or Voluntary Purchase Scheme](#) and [Need to Sell Scheme](#)
- In a homeowner payment zone: [Homeowner Payment Scheme](#) (Phase 1 only) and [Need to Sell Scheme](#)
- Outside the zones: [Need to Sell Scheme](#)
- Rent Back: It is possible to [apply to rent and continue living in the property](#) if it is sold to the government under one of these schemes.

For Phase 2a the relevant [property scheme maps](#) showing compensation zones are available on the HS2 Ltd. website.

#### 3.1 Overview

Petitioners to the HS2 Phase 1 Bill Committee and Members of Parliament were concerned about the adequacy of the proposed compensation arrangements for those affected by the HS2 line since they were first announced in 2012. Those concerns continue, particularly as the compensation settlement for Phase 1 are the model for Phase 2.<sup>114</sup> In his 30 November 2015 statement, the Secretary of State said:

The Government are committed to assisting people along the HS2 route from the west midlands to Crewe [... I therefore propose] to implement the same long-term property assistance schemes for phase 2a as we have for phase 1. As with phase 1, the Government propose to go above and beyond what is required by law, including discretionary measures to help more people. HS2 will deliver economic growth for this country, not just in the immediate future but for the long term, and that is why we continue to commit to this essential project.<sup>115</sup>

A consultation on compensation for Phase 2a was launched at the same time. It was based on the existing package available to owner-occupiers affected by the Phase 1 route. In addition to receiving the unblighted value of their home, eligible owner-occupiers can expect to receive a home loss payment of 10% of the value of their home (up to £53,000) and reasonable moving costs.<sup>116</sup> The Government published the

Further information on the development of the HS2 compensation schemes can be found in HC Library briefing paper [CBP 316](#) on Phase 1 of HS2.

<sup>113</sup> DfT, [Claim compensation if your property is affected by HS2](#) [accessed 6 September 2018]

<sup>114</sup> plaintiffs were successful in a legal case challenging the first consultation on the compensation scheme; the Government decided not to appeal and reran the consultation in line with the judge's finding, see: DfT, [HS2 judicial review the challenges explained](#), 15 March 2013, and DfT press notice, "[High court rejects legal challenges to HS2 in landmark victory for the government](#)", 15 March 2013

<sup>115</sup> [HC Deb 30 November 2015, c23](#)

<sup>116</sup> DfT press notice, "[Property consultation launched as HS2 route from West Midlands to Crewe confirmed](#)", 30 November 2015; and [HS2 Phase Two: West Midlands to Crewe Property Consultation 2015](#), 30 November 2015

outcome to the consultation in May 2016, announcing that it had decided to implement the package of compensation and assistance schemes for owner-occupiers along the Phase 2a route that had previously been applied to Phase 1.<sup>117</sup>

## 3.2 HS2 residents & communities

The [HS2 Residents' Charter](#) came into being on 16 January 2015. It is intended to "ensure that residents are treated in a fair, clear, competent and reasonable manner".<sup>118</sup>

To date, the Residents' Commissioner, Deborah Fazan, has published [nine reports](#), the most recent dated 8 June 2018. In terms of the operation of the various compensation schemes the report said that as at 30 April 2018:

- 825 properties had been acquired by HS2 Ltd. under different property schemes;
- 635 blight notices in the Express Purchase Zone had been accepted, and a further 15 were being assessed. Over 400 applications from Phase 2b had been received (although no construction work in this phase is expected to begin before 2023);
- 431 Rural Support Zone applications had been received, of which 325 had been accepted and 89 were being assessed. The majority of applications (305) came from Phase 2b;
- 631 Need to Sell scheme applications had been received, of which 234 had been accepted and a further 74 were waiting for a decision. The acceptance rate for Phase 2b remained low at about 31%, particularly when compared with acceptance rates on applications from Phase 1 and 2a, which averaged 56%;
- 739 applications to the Phase 1 Homeowner Payment scheme had been received, of which 654 had been accepted and a further 32 were in progress. Over 615 applicants had received payments.<sup>119</sup>

In November 2015 the Parliamentary and Health Services Ombudsman (PHSO) found serious failings in HS2 Ltd.'s engagement with a community in Staffordshire. In its report it stated that:

We found that overall HS2 Ltd's actions fell below the reasonable standards we would expect, so much so that they constituted maladministration ... We have found that by failing to engage with the residents or their proposals reasonably, HS2 Ltd unnecessarily prolonged the uncertainty that the residents were experiencing.<sup>120</sup>

HS2 Ltd. subsequently apologised, made a number of payments to those affected totalling £10,500, and made some improvements to how it interacts with the public. It also commissioned Ian Bynoe to publish an

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<sup>117</sup> DfT, [Decision Document HS2 Phase Two: West Midlands to Crewe Property Consultation 2015](#), Cm 9286, 26 May 2016, p3

<sup>118</sup> Commons HS2 Bill Phase 1 Committee, "[High Speed Rail Bill Select Committee: Statement by the Promoter and by the Chair](#)", 20 January 2015

<sup>119</sup> HS2 Ltd., [HS2 Residents' Commissioner Report 9 – May 2018](#), 8 June 2018

<sup>120</sup> PHSO, [Report on an investigation into complaints about High Speed Two Limited](#), HC 620, 26 November 2015, p3

independent report into its complaints handling and community engagement. This was published in April 2016.<sup>121</sup>

The Public Administration and Constitutional Affairs Committee followed up the PHSO's report with its own in March 2016. PACAC concluded that on the basis of a "large body of evidence" it had received, it was "unconvinced that the necessary fundamental changes have taken place". The Committee urged "those in senior positions to recognise that this is a matter of primary importance".<sup>122</sup>

In September 2017 HS2 Ltd. published its Community Engagement Strategy, which set out its approach to community engagement with those who live or work within the communities along the HS2 route.<sup>123</sup>

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<sup>121</sup> HS2 Ltd., [Report on HS2 Ltd's complaints handling and community engagement](#), 21 April 2016

<sup>122</sup> PACAC, [Follow up to PHSO Report of an investigation into a complaint about HS2 Ltd](#) (sixth report of session 2015–16), HC 793, 23 March 2016, p3

<sup>123</sup> HS2 Ltd., [HS2 Ltd's Community Engagement Strategy](#), 28 September 2017

## 4. Route development for Phase 2b

### 4.1 Initial proposals, 2010-13

The plans for Phase 2 generally have changed since 2010: it was initially supposed in the January 2012 command paper that Phase 2 would include a direct link between HS1 and HS2, allowing direct travel between the Continent and the north of England without the need to change in London, and that 'route options' should be developed for a spur to Heathrow Airport.<sup>124</sup> In January 2013 the Government announced a 'pause' on work for a Heathrow spur, pending the outcome of the Davies Commission review of airport hub capacity.<sup>125</sup> Provision for the HS1-HS2 direct link was included in the Phase 1 Bill; in March 2014 the Government announced its intention to remove it from the Bill on the basis that it should not proceed.<sup>126</sup>

In January 2013 the Government published a command paper setting out in some detail its proposals for Phase 2 from Birmingham north to Manchester (via Crewe) and Leeds (via the East Midlands and Sheffield).<sup>127</sup> The proposed route interchanges/terminals were as follows:

- **Manchester city centre** alongside the existing Manchester Piccadilly main line station;
- **Manchester Airport**, alongside the M56, between Warburton Green and Davenport Green "subject to agreement of a suitable funding package";
- **East Midlands at Toton** (East Midlands Hub), located between Nottingham and Derby, 1.2 miles from the M1 and close to the A52;
- South Yorkshire at **Sheffield Meadowhall**, to the east of Sheffield city centre, adjacent to the M1;
- **Leeds** at New Lane, in Leeds city centre to the south of the River Aire and with close links to the existing Leeds City station; and
- **connections** to the West Coast Main Line, just to the south of the existing **Crewe** station and to the south of **Wigan**, near Golborne; and to the East Coast Main Line near **Church Fenton** approximately 9 miles to the south west of York.<sup>128</sup>

In July 2013 the Government published a consultation document on Phase 2. It explained the Government's case for Phase 2 and set out the proposed route from the West Midlands to Manchester and Leeds with

<sup>124</sup> DfT, [High Speed Rail: Investing in Britain's Future – Decisions and Next Steps](#), Cm 8347, January 2012, p37

<sup>125</sup> DfT, [High speed rail: investing in Britain's future – Phase Two: the route to Leeds, Manchester and Beyond](#), Cm 8508, January 2013, p71

<sup>126</sup> [HC Deb 17 March 2014, cc53-54WS](#)

<sup>127</sup> op. cit., [High speed rail: investing in Britain's future – Phase Two: the route to Leeds, Manchester and Beyond](#), p9

<sup>128</sup> *ibid.*, pp36-37&47

stations at Manchester Airport, Manchester City Centre, in the East Midlands close to Derby and Nottingham, Sheffield and Leeds; the connections to the existing railway at Crewe, south of Wigan and south of York to allow the trains to serve further destinations; and the supporting infrastructure required (e.g. depots). It sought views on whether there should be any additional stations on either leg; explained the sustainability impacts of the proposed route; looked at ideas on how to use the rail capacity freed up on the conventional rail network; and looked at how to integrate HS2 with other utilities, like water or electricity, alongside the line. The consultation closed in January 2014.<sup>129</sup>

Alongside the consultation document, the Government published a sustainability statement. The non-technical summary stated that Phase 2 “would have no direct impacts on AONBs, Registered Battlefields, Grade I and Grade II structures, Registered Parks and Gardens and Natura 2000 sites”.<sup>130</sup>

## 4.2 Higgins Report and beyond, 2014-16

In October 2014 the then Chairman of HS2 Ltd., Sir David Higgins, published his second report on developing Phase 2. His central proposals were as follows:

- There should be an investigation into the possibility of running classic compatible services to **Stoke-on-Trent, Macclesfield and Stockport**.<sup>131</sup>
- **Leeds Station** should be fundamentally reviewed by HS2 Ltd., Network Rail and Leeds City Council, as by the time Phase 2 is complete, the existing station will need to be remodelled.<sup>132</sup>
- The route approach to Manchester should be via **Manchester Airport**, but “whether the airport station is built at the same time as the HS2 approach to Manchester is a matter for Ministers and Greater Manchester to agree in the future”.<sup>133</sup>
- The route between **Warrington and Manchester** to the existing West Coast Main Line (WCML) via the **Golborne link** and the construction of a depot in an environmentally sensitive part of the route require further, urgent work as “a link to the [WCML] will be necessary sooner rather than later as part of the wider consideration of how to improve services to Scotland”.<sup>134</sup>
- The proposal for a new station at **Toton**, located between Derby and Nottingham, should be reviewed with a view to investigating alternative station sites to the west of Toton “which can provide

<sup>129</sup> DfT, *High Speed Rail: investing in Britain's future - Consultation on the route from the West Midlands to Manchester, Leeds and beyond*, July 2013

<sup>130</sup> Temple-ERM for HS2 Ltd, *High Speed Rail: Consultation on the route from the West Midlands to Manchester, Leeds and beyond - Sustainability Statement, Non-technical summary*, July 2013, p28

<sup>131</sup> op. cit., *Rebalancing Britain: from HS2 towards a national transport strategy*, p8

<sup>132</sup> ibid., pp8&32-33

<sup>133</sup> ibid., p29

<sup>134</sup> ibid., p29

much better road and rail connections via the M1 and Midland Main Line respectively".<sup>135</sup>

- On the two opposing schemes for a **Sheffield station/South Yorkshire hub** – at the old Sheffield Victoria Station to the north east of the city centre and at the existing station, Sheffield Meadowhall, in the east of the city – there is "insufficient evidence to recommend altering the current proposal at this stage, so I remain of the view that Sheffield Meadowhall is the right answer for the South Yorkshire hub".<sup>136</sup>

Liverpool launched a campaign for Phase 2b to be extended '[20 Miles More](#)' to the city and has said that it would be able to repay £2 billion of the estimated £3 billion cost for the extension on the basis of increased business rates and income from devolved local employers' National Insurance Contributions.<sup>137</sup>

## Initial problems with Leeds & Sheffield stations

Two of the most contentious issues are the locations of the Sheffield and Leeds stations on the eastern branch of the Phase 2 route.

In February 2015 the Government asked Sir David to look at the options for HS2 into Leeds city centre following concerns that the originally proposed new station at New Lane was a quarter of a mile from the existing Leeds station.<sup>138</sup> Sir David published his conclusions in November 2015, recommending his so-called 'option 2', i.e. extending the existing Leeds Station to the south, with HS2 platforms reaching directly into the existing station, creating a common concourse between services.<sup>139</sup>

Following the announcement in November 2015 of the changes to Leeds station, Sheffield City Council chiefs renewed their calls for its high speed station to be located in the city centre rather than at Meadowhall.<sup>140</sup> In its November 2015 command paper the Government said that its preference remained for Meadowhall but that it recognised:

... the arguments put forward for a city centre station in Sheffield and we continue to explore them. We are committed to ensuring that HS2 delivers the largest possible benefits and continue to work with local partners to ensure that Sheffield city centre will benefit from HS2.<sup>141</sup>

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<sup>135</sup> *ibid.*, p30

<sup>136</sup> *ibid.*, p32

<sup>137</sup> "[Liverpool offers £2bn to be included in HS2 network](#)", *The Guardian*, 23 February 2016

<sup>138</sup> "[Higgins to look at other sites for Leeds HS2 station](#)", *Rail Technology Magazine*, 6 February 2015

<sup>139</sup> HS2 Ltd., [The Yorkshire Hub: An interim report on the redevelopment of Leeds station](#), 30 November 2015, pp14-15

<sup>140</sup> "[Call to 'see sense' over Sheffield HS2 station after Leeds decision](#)", *The Star*, 30 November 2015

<sup>141</sup> *op. cit.*, [High Speed Two: East and West: The next steps to Crewe and beyond](#), para 8.18, p86

There were reports in March 2016 that disagreements over the location of the Sheffield station were a contributory factor to delays with Phase 2b.<sup>142</sup>

In July 2016 Sir David published a further report analysing the various options for Sheffield and South Yorkshire. He recommended that the Government proceed with his suggested plan to physically separate the service to South Yorkshire from that to the route further North. He argued that this could “be achieved by what is termed a classic compatible service – a dedicated link taking high speed trains off the main line and running up to two trains per hour into Sheffield on existing lines whilst the main HS2 line continues to carry trains serving Leeds and further North”. It would also allow a re-appraisal of the main HS2 route to the East, running it initially parallel to the M18 to avoid not only the complexities associated with the Meadowhall viaduct but the legacy of mining in the area and allowing for fewer potential watercourse diversions.<sup>143</sup>

### 4.3 Announcement of preferred route, November 2016

An announcement on the full Phase 2 route was much delayed: it was originally expected towards the end of 2014.<sup>144</sup>

In the event, the Government announced its preferred route from Crewe to Manchester and the West Midlands to Leeds on 15 November 2016:

On the western leg, HS2 will:

- continue north from Crewe to Manchester Airport
- continue from Manchester Airport on to Manchester city centre, where a new HS2 station will be built next to Manchester Piccadilly

There will also be a connection to Liverpool and to the existing West Coast main line allowing HS2 services to continue north, serving stations to Glasgow and Edinburgh.

On the eastern leg, HS2 will:

- continue from the West Midlands to Toton in the East Midlands, where a new HS2 station will be built to serve Nottingham, Derby and the wider region
- continue north from the East Midlands to South Yorkshire
- in line with Sir David Higgins’ recommendation, we propose HS2 should serve Sheffield with a connection to the existing station with the main route be moved further east and we will be consulting before a final decision is made next year

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<sup>142</sup> “HS2 station row threatens Osborne’s northern powerhouse”, *Sunday Times*, 6 March 2016

<sup>143</sup> HS2 Ltd., *Sheffield and South Yorkshire Report 2016*, 7 July 2016

<sup>144</sup> op. cit., *High Speed Rail: investing in Britain’s future - Consultation on the route from the West Midlands to Manchester, Leeds and beyond*, para 5.3.1, p42



- from South Yorkshire, HS2 will continue to Leeds where a new HS2 station will be built in Leeds city centre, adjacent to the existing station

HS2 will also have a connection onto the East Coast Main Line, allowing HS2 to serve York, Newcastle and other places in the north-east.<sup>145</sup>

On the thorny question of the alignment around **Sheffield**, the command paper indicated that the Secretary of State was “minded to accept” Sir David Higgins’ July 2016 recommendations of a 9.4km southern spur at Stonebroom off the HS2 mainline, enabling HS2 trains to run into Sheffield city centre along the existing rail network; and that the main north-south alignment should follow a more easterly alignment over some 70km between Derbyshire and West Yorkshire as its preferred option.<sup>146</sup> It sought views on this option (instead of the original Meadowhall option) in a design refinement consultation (see below).

Information on how the scheme would tie up with **Northern Powerhouse Rail** and routes to **Scotland** are examined in sections 5 and 6 below.

With regards to **Liverpool**, journey times to London are expected to be cut by more than 45 minutes after Phase 2a opens in 2027. More widely, Transport for the North (TfN) has examined two options that make use of HS2 to connect Manchester and Liverpool. Both options involve construction of a new line to Liverpool, and a junction onto the HS2 route. Under these options it would be possible to deliver a 30-minute journey between Manchester and Liverpool, connecting the cities via Manchester Airport.<sup>147</sup>

Responses to the announcement were mixed, with some arguing that “the Government have finally come clean in admitting ‘freeing up capacity’ means for many cities ‘losing the trains you already have’”,<sup>148</sup> others that “the Government must set out an integration plan to show exactly how HS2 will enable extra freight and passenger trains on the existing network and how the new high speed services and stations will link with the rest of the transport network”.<sup>149</sup>

In July 2018 the Government announced that the East Midlands HS2 Partnership would receive up to £1.8 million of funding to maximise the benefits of the new HS2 station at **Toton**, specifically by funding the development of proposals for public transport connections to the Toton hub.<sup>150</sup>

<sup>145</sup> DfT press notice, “[HS2 route to the East Midlands, Leeds and Manchester set out by the government](#)”, 15 November 2016

<sup>146</sup> op cit., [High Speed Two: From Crewe to Manchester, the West Midlands to Leeds and beyond](#), p15

<sup>147</sup> ibid., p65; Liverpool’s Long Term Rail Strategy, published in April 2018, [lists schemes](#) which are currently in progress to the benefit of Liverpool and those which it would like to see taken forward over the next 10+ years. There is also a [section looking at Liverpool’s current connectivity](#), challenges and how it can be enhanced by HS2

<sup>148</sup> Stop HS2 press notice, “[Government announce cuts to existing services along with HS2 Phase 2b route](#)”, 15 November 2016

<sup>149</sup> Campaign for Better Transport press notice, “[Campaigners call for HS2 integration plan as preferred route for second phase is announced](#)”, 15 November 2016

<sup>150</sup> DfT press notice, “[Up to £1.8 million to maximise benefits of HS2 for East Midlands](#)”, 11 July 2018; it is not clear whether this is funded from the HS2 budget or from elsewhere

## 4.4 Design refinements, 2016-17

Alongside the announcement of the preferred route in November 2016 the Government issued a consultation on a number of design refinements, on both the western and eastern legs. These were:

On the western leg:

- to move the previously proposed rolling stock depot at Golborne to a site north of Crewe
- to move the approach to Manchester Piccadilly up to 370 metres eastwards with the northern tunnel portal in Ardwick, to avoid direct impacts on residential properties and a school at West Gorton
- to move the route in the Middlewich - Northwich area in Cheshire up to 800 metres westwards

On the eastern leg:

- to move the route to the east of Measham in Leicestershire, avoiding the most significant impacts on local manufacturing businesses and development sites
- to go around instead of tunnel under East Midlands Airport
- to amend the alignment of the preferred route as it passes through Long Eaton to reduce severance in the local community and reduce impacts on the highway network and existing rail infrastructure
- to move the alignment of the route from Derbyshire to West Yorkshire to reflect a change in the proposals for serving the Sheffield city region, as recommended by Sir David Higgins in his report *Sheffield and South Yorkshire* published in July 2016<sup>151</sup>

The Secretary of State for Transport, Chris Grayling, announced his decisions on 17 July 2017:

After carefully considering the responses to the consultation, I have decided to confirm the following changes to the route. The western leg rolling stock depot will move from a site near Golborne to a site north of Crewe. That site will be included in the full environmental assessment being undertaken for the whole route and I will look carefully at that assessment.

A 26 km section of the route in the Middlewich and Pickmere area of Cheshire will change and be raised as it passes through the Cheshire salt plains, to avoid brining and gas storage infrastructure. The approach to Manchester Piccadilly station will be adjusted to improve operational efficiency and reduce impacts on residential areas and a primary school. The route near East Midlands airport will now closely follow the eastern side of the A42. This avoids tunnelling under the airport and reduces the impacts on some communities. At Long Eaton, after much consultation with the local community, the route will pass through the town on a high viaduct.

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<sup>151</sup> DfT, [\*HS2 Crewe to Manchester, West Midlands to Leeds: Route Refinement Consultation 2016\*](#), 15 November 2016

The route in South Yorkshire will be the route we consulted on in 2016, which in part follows the M1 and M18, and serves Sheffield city centre via a spur from the HS2 line. I am also asking HS2 Ltd to take forward the provision of a northern junction back on to HS2, giving a city centre to city centre connection between Leeds and Sheffield in less than 30 minutes. That is very important for the development of Northern Powerhouse Rail. We will also continue to work on a possible parkway station.

Finally, I have decided not to proceed with the proposed change of route to the east of Measham. Instead, I am confirming a modified version of the 2013 preferred route to the west of Measham. In Measham itself, the route is moved approximately 80 metres and the viaduct extended to mitigate commercial property impacts. I have heard the concerns raised by local communities about the proposed eastern leg rolling stock depot at Crofton. HS2 Ltd believes it has found a better option, on which I am now consulting, which is east of Leeds in the Aire valley, adjacent to the M1 on a brownfield site.<sup>152</sup>

## Eastern leg rolling stock depot

As indicated by Mr Grayling, above, there have been concerns raised by local communities about the proposed eastern leg rolling stock depot at Crofton. HS2 Ltd. consequently developed a different option, east of Leeds in the Aire valley, adjacent to the M1 on a brownfield site.

HS2 Ltd. issued a consultation on this new site in July 2017. It stated:

The Secretary of State is minded to relocate the Eastern Leg RSD to a site east of Leeds in the Aire Valley, adjacent to the M1 and the A63 corridor ...

The site is brownfield land, previously used for industrial purposes. There are good connections to the local highway network, and the site has planning consent for a large area of commercial development.

This site provides operational benefits when compared to the previously proposed site at New Crofton, and there is potential to further improve the site's operational suitability without increasing costs or impacts. The site also has the potential to provide an operational cost saving due to its proximity to Leeds as this will reduce the distance empty trains need to run from the station to the depot.

The site would be connected to the Leeds spur corridor using a flat junction and two approach tracks.

It is possible additional maintenance sidings will be needed and work continues to assess this.<sup>153</sup>

The consultation closed in October 2017. In July 2018 the Government confirmed its intention to move the depot site to the Aire Valley.<sup>154</sup>

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<sup>152</sup> [HC Deb 17 July 2017, cc662-3](#); see also: DfT, [High Speed Two Phase 2b: Crewe to Manchester & West Midlands to Leeds Route Refinement Consultation 2016, a summary of consultation responses](#), 17 July 2017

<sup>153</sup> HS2 Ltd., [High Speed Two Phase 2b Crewe to Manchester West Midlands to Leeds: Eastern Leg Rolling Stock Depot Consultation document](#), 17 July 2017, pp8-9

<sup>154</sup> DfT press notice, ["Leeds confirmed as site of HS2 eastern leg rolling stock depot"](#), 4 July 2018

## 4.5 Next steps – hybrid bill

We had expected the hybrid bill for Phase 2b to be published by the end of 2019.<sup>155</sup> In preparation, HS2 Ltd. published a consultation on the technical scope and methodology to be used in the environmental and equality impact assessments.<sup>156</sup>

However, at the beginning of September 2018 it was announced that the Bill would now likely to be delayed to the end of 2020 to enable its design to be properly integrated with Northern Powerhouse Rail (see section 5, below). *The Times* reported:

... the legislation needed to pave the way for the second section of HS2 to serve northern England has been put on hold for a year. The bill enabling the line to be built to Manchester and Leeds will now be tabled in 2020.

The government insisted that the delay was needed to ensure that HS2 was linked into a proposed upgrade of the main east-west railway line across the Pennines, which is still on the drawing board [...] The Department for Transport confirmed that the hybrid bill was being paused to take account of "northern powerhouse rail", the east-west network linking Liverpool, Manchester, Leeds, Sheffield and Newcastle.

"To maximise the huge potential of HS2, it is important to take full account of the emerging vision for the other transformative project of northern powerhouse rail," a spokesman said.<sup>157</sup>

The following day it was announced that Paul Griffiths, managing director of Phase 2 at HS2 Ltd., is leaving his position at the end of 2018.<sup>158</sup>

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<sup>155</sup> [HC Deb 17 July 2017, c663](#)

<sup>156</sup> HS2 Ltd., [HS2 Phase 2b draft Environmental Impact Assessment Scope and Methodology Report](#) and [HS2 Phase 2b draft Equality Impact Assessment Scope and Methodology Report](#), 17 July 2017; both closed in September 2017, the Government has yet to issue a response

<sup>157</sup> ["HS2 legislation pushed back a year as doubts grow over £56bn project"](#), *The Times*, 3 September

<sup>158</sup> ["HS2 boss quits as northern section delayed for a year"](#), *The Times*, 4 September 2018

## 5. Northern Powerhouse Rail (NPR)

### 5.1 Terminology

Over the past four or five years there have been a flurry of proposals to upgrade the rail network across the North of England. Different names have been attached to these proposals, which began to coalesce around the idea of the 'Northern Powerhouse'.

Initially there was talk of 'High Speed 3' (HS3) – a plan to build a new 'high speed rail' connection across the Pennines, from Manchester to Leeds. Gradually this morphed into a wider concept of 'Northern Powerhouse Rail' (NPR), extending beyond the initial idea of HS3. In terms of what this means in practice, in December 2015 the then Transport Minister in the Lords, Lord Ahmad of Wimbledon, explained:

The Northern Powerhouse Rail network develops the HS3 concept to offer a vision for radically improved journey times and service frequencies between the major cities of the North, building on the substantial rail improvements to which the government is already committed.<sup>159</sup>

NPR now goes beyond the single trans-Pennine line originally designated HS3 and is generally used to refer to the wider programme of strategic rail projects across the North. Therefore when the Government, Transport for the North (TfN) and others talk of integration between HS2 and NPR they are not only talking about closing that trans-Pennine link between the HS2 termini in Leeds and Manchester but about other linkages across the north.

The idea of the trans-Pennine rail upgrade is now sometimes referred to as 'Crossrail for the North' (XR4N). In August 2017 a group of Northern leaders wrote to the Prime Minister, equating NPR and XR4N, though this has not appeared in any official reports by, for example, TfN (see below).<sup>160</sup>

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<sup>159</sup> [WPO HL4692, 21 December 2015](#)

<sup>160</sup> ["YP Letters: Plea to Theresa May for 'Crossrail in the North'", Yorkshire Post, 22 August 2017](#)

### What is 'high speed' rail?

While there is no internationally agreed definition of what constitutes a high speed railway, policymakers have now generally fallen into line with the definition set out in the European Union's 1996 Directive dealing with high-speed rail. This defined 'high speed line' in the following way:

High-speed lines shall comprise:

- specially built high-speed lines equipped for speeds generally equal to or greater than 250 km/h [155 mph],
- specially upgraded high-speed lines equipped for speeds of the order of 200 km/h [124 mph],
- specially upgraded high-speed lines which have special features as a result of topographical, relief or town-planning constraints, on which the speed must be adapted to each case.<sup>161</sup>

This causes confusion in the debate about the trans-Pennine upgrade, as a 125 mph conventional rail line is technically a high speed line, but the prevailing debate about HS2 means that to most people 'high speed' means the speeds of 200 mph+ being proposed for that route.

## 5.2 Background, 2010-14

A trans-Pennine high speed rail link has long been discussed as a desirable part of any 'high speed network' for the UK. In fact it was part of the recommended scheme, called the 'inverse A' alignment, that HS2 Ltd. put to the Labour Government before the 2010 General Election:

The Inverse A configuration is an adaptation of networks which have been examined in other past studies. It is the most comprehensive network able to be supported by the capacity of HS2, relying as it does on one route north from London. We report on the possible need for a second line from London later in this chapter.

The Inverse A aims to maximise benefits to the widest number of people by offering direct London access to each of the conurbations in our remit, as well as Merseyside (via the existing classic line), East Midlands and South Yorkshire. The transpennine link between Manchester and Leeds would carry only east-west flows, with services to and from London travelling either side of the Pennines. This configuration would also unlock potential for a network of high speed inter-regional services.<sup>162</sup>

This would have delivered journey times between Leeds and Manchester and Liverpool of approximately 25 minutes.<sup>163</sup> It put the cost of the trans-Pennine element at between £3.8 billion and £4.6 billion, depending on whether the line went to the east or west of Manchester, with a total length of between 54 and 69 km.<sup>164</sup>

In its March 2010 command paper the Labour Government rejected the trans-Pennine link as part of its broader support for a 'Y network':

... the Government believes that the link between Manchester and Leeds would be best enhanced through consideration of

More information on the Northern Powerhouse can be found in HC Library briefing paper [CBP 7676](#).

<sup>161</sup> [Directive 96/48/EC](#), 23 July 1996, Annex I, para 1(b)

<sup>162</sup> HS2 Ltd. for DfT, [High Speed Rail London to the West Midlands and Beyond: A Report to Government by High Speed Two Limited](#), March 2010, p220, paras 6.1.11-12; for recommendation see p9

<sup>163</sup> *ibid.*, p226

<sup>164</sup> *ibid.*, p229, figure 6.1f

options for a conventional upgrade of the existing line rather than through a new high speed line, given the proposals for upgrading the line contained in Network Rail's Northern Hub plan.<sup>165</sup>

It then sat on the backburner somewhat until 2014, when the Government began talking about the concept of a 'Northern Powerhouse'. In a June 2014 speech the Chancellor of the Exchequer, George Osborne, said:

We need an ambitious plan to make the cities and towns here in this northern belt radically more connected from east to west - to create the equivalent of travelling around a single global city. As well as fixing the roads, that means considering a new high speed rail link.

Today I want us to start thinking about whether to build a new high speed rail connection east-west from Manchester to Leeds. Based on the existing rail route, but speeded up with new tunnels and infrastructure.

A third high speed railway for Britain.<sup>166</sup>

The immediate responses to this idea were mixed. Sir Richard Leese, leader of Manchester City Council and a supporter of HS2, told *The Guardian* that the north could have "both vastly improved services on what he admits are the currently "wretched" northern lines, while looking 20 years ahead to super-high-speed links".<sup>167</sup> Dr Richard Wellings, Head of Transport at the Institute of Economic Affairs and an opponent of HS2, said that the relatively short distances between northern cities "mean that high-speed rail is an expensive and inefficient way of linking them together" and that smaller-scale schemes would deliver higher returns for the taxpayer.<sup>168</sup>

In July 2014 five big city councils in the North of England (Leeds, Liverpool, Manchester, Newcastle and Sheffield) published *One North*, a report setting out a 'strategic proposition' for transport in the North. This included a recommendation for:

A new 125 mph trans-Pennine route, connected to the HS2 lines and the existing rail network, tunnelled as needed, linking the five city regions together with Manchester Airport and the ports. It will be a facility that will need to be planned for intensive use as a high-reliability all-weather central component in the North's transport system.<sup>169</sup>

Sir David Higgins, the then Chairman of HS2 Ltd., published a report in October 2014 which included consideration of what sort of east-west rail link would benefit the North of England. Sir David reported that Network Rail had undertaken an initial study for his report to look at how journey times and reliability between Manchester and Leeds might be improved:

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<sup>165</sup> op. cit., *High Speed Rail*, para 4.31, p74

<sup>166</sup> HMT, *Chancellor: 'We need a Northern powerhouse'*, 23 June 2014

<sup>167</sup> "Forget HS3 – we need to fix the north of England's wretched rail service now", *The Guardian*, 23 June 2014

<sup>168</sup> IEA press notice, "HS3: A costly vanity project", 23 June 2014

<sup>169</sup> Northern Councils, *One North: A Proposition for an Interconnected North*, July 2014, p25



It has examined broad options of varying scales of complexity and cost ranging from a new dedicated, high speed track involving the construction of a tunnel underneath the Pennines to an upgrade of the existing line using existing but unused tunnels. They also looked at upgrading the Manchester-Sheffield service in parallel to that to Leeds.

The work demonstrates two things. Firstly, that a much improved service is possible, delivering a journey time of somewhere between 26 to 34 minutes for Leeds to Manchester ... Clearly that is transformational and would, undoubtedly, lead to more trade and commuting between the two cities. It is also within reach of the aspiration set out in the One North report for a journey time of 30 minutes, an increase in capacity of up to 8 trains an hour, and a marked improvement in the performance and reliability of the line. This, plus further electrification and upgrades in the meantime, could result in the journey time from Liverpool to Leeds going from around 2 hours to an hour, and cutting half an hour off the time from Manchester to Hull and Newcastle.

The work also, however, illustrated the need for a deeper exercise to bottom out which route between Leeds and Manchester would be best and the cost and value for money of each option. That work now needs to continue in order to turn the aspiration into a practical plan.<sup>170</sup>

### 5.3 National Infrastructure Commission report, 2016

In March 2016 the National Infrastructure Commission (NIC), then chaired by Lord Adonis, published its third report, called *High Speed North*. Its central recommendation on rail was “kick-starting HS3, integrating it with HS2 and planning for the redevelopment of the North’s gateway stations”.<sup>171</sup>

The Commission defined HS3/NPR as “a transformed east-west network from Liverpool in the west to Hull and Newcastle in the east”.<sup>172</sup> It said that HS3 should make use of key northern sections of HS2, upgraded existing lines, and sections of new track where necessary “to provide capacity, speed and congestion relief” and “enhanced connectivity and improved journey times between the major cities of the North and to Manchester Airport”.<sup>173</sup> This would be achieved by upgrading the TransPennine line between Manchester and Leeds; designing the optimal configuration for the northern phase of the HS2 network; and redeveloping Manchester Piccadilly station.<sup>174</sup>

The Commission explained that Network Rail had been commissioned and funded to develop a plan for a major upgrade of the TransPennine line from Leeds to Manchester via Huddersfield for delivery by 2022. It said that, building on this, proposals should be developed to integrate it with options for a second phase of major route enhancements, which

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<sup>170</sup> op. cit., [Rebalancing Britain: from HS2 towards a national transport strategy](#), p34

<sup>171</sup> NIC press notice, “[Put HS3 at the heart of a High Speed North – Adonis](#)”, 15 March 2016

<sup>172</sup> NIC, [High Speed North](#), 15 March 2016, p4

<sup>173</sup> *ibid.*, p8

<sup>174</sup> *ibid.*, p8



should aim to deliver a 30-minute journey time, together with capacity and frequency improvements. Crucially, the Commission said that this second phase “may not require a completely new line but will require sections of major new infrastructure”.<sup>175</sup>

Bearing all this in mind, the Commission recommended:

The upgrade of the Leeds to Manchester link should form the first phase of HS3 to be developed in detail. It should comprise a long-term programme with the objective of reducing journey times to 30 minutes, alongside substantial capacity and frequency improvements. The first part of this should be a shorter-term plan, to be developed and implemented by TfN and Network Rail by 2022, to cut the journey time between these cities and to onward destinations by roughly 20% from 49 to 40 minutes, enhance capacity and improve service regularity and frequency.<sup>176</sup>

In the March 2016 Budget, published the day after the NIC report, the Government accepted the NIC’s recommendations and said it was “giving the green light to High Speed 3 between Leeds and Manchester to reduce journey times to around 30 minutes”.<sup>177</sup> To this end, it would provide £60 million to develop plans both for the Leeds-Manchester route by 2017 and to improve transport connections between cities of the North.<sup>178</sup>

## 5.4 Command paper & Government policy, 2016-

As indicated in section 4.3, above, in November 2016 the Government announced its preferred route for Phase 2b of HS2 from Crewe to Manchester and the West Midlands to Leeds. It put a great deal of emphasis on the importance of connecting HS2 to NPR in order to leverage the anticipated local economic impacts of HS2 in the north.

The main NPR benefits highlighted in the command paper were as follows:

- Building a connection north of **Sheffield Midland** would result in Sheffield being served by a ‘loop’ and create the opportunity to connect Sheffield city centre with Leeds, York and Newcastle. This connection could be the first step in delivering a ‘Northern Powerhouse network’, with journeys between Sheffield and Leeds of around 25 minutes;
- A new connection for services travelling north from Sheffield could serve **York, Newcastle and Hull** via Leeds station;
- The Government has begun work on a study to examine the potential for a parkway station in Yorkshire, as well as whether HS2 services between Sheffield Midland and London can also serve **Rotherham, Barnsley or Meadowhall**;
- TfN has examined two options that make use of HS2 to connect **Manchester and Liverpool**. Both options involve construction of

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<sup>175</sup> *ibid.*, pp8-9

<sup>176</sup> *ibid.*, p9

<sup>177</sup> HMT, [Budget 2016](#), HC 901, 16 March 2016, para 1.232, p62

<sup>178</sup> *ibid.*, para 1.291, p73

a new line to Liverpool, and a junction onto the HS2 route. Under these options it would be possible to deliver NPR's ambitions for a 30 minute journey between Manchester and Liverpool, connecting the cities via Manchester Airport;

- There is strong local aspiration for NPR services into, and through, **Manchester** to serve Manchester Piccadilly so that interchange can be made easily with HS2; and
- Compared to the **Leeds** HS2 station proposed in the 2013 consultation, the current proposal better integrates HS2 into the city centre and the existing rail station, enabling easy interchanges onto current rail services across West Yorkshire and future NPR services.<sup>179</sup>

The Government indicated willingness to include 'passive provision' for NPR services in the Phase 2b hybrid bill.<sup>180</sup>

In October 2017 the Government announced £300 million in 'extra' funding to:

... go towards ensuring HS2 infrastructure can accommodate future Northern Powerhouse Rail and Midlands Connect services. Future-proofing will make it easier and less disruptive to build Northern Powerhouse Rail in the future. This will enable faster services between the Northern cities of Liverpool and Manchester, Sheffield, Leeds and York, as well as on towards the East Midlands and London. It will also enable services between Liverpool and Leeds to pass via Manchester Piccadilly station.<sup>181</sup>

In July 2018 the Rail Minister, Jo Johnson, summarised the Government's policy on upgrading the existing trans-Pennine rail line:

The government is investing nearly £3bn between 2019 and 2024 in this upgrade, one third of our expected investment in rail enhancements between 2019 and 2024. It will be a rolling programme of enhancements including both major civil engineering and electrification. And we are working with Network Rail and Transport for the North to determine the best way to achieve major improvements for passengers. We will make further decisions later this year.<sup>182</sup>

## 5.5 Strategic Transport Plan for the North, 2014-

In his response to the Higgins report (section 5.2, above) the then Secretary of State for Transport, Sir Patrick McLoughlin, announced his intention to create a new sub-national transport body (STB) called [Transport for the North \(TfN\)](#), made up of the main northern city regions, to work together with other authorities and stakeholders and

<sup>179</sup> op cit., [High Speed Two: From Crewe to Manchester, the West Midlands to Leeds and beyond](#), pp65-66

<sup>180</sup> ibid., p66

<sup>181</sup> HMT press notice, "[Northern transport gets further funding from government](#)", 2 October 2017

<sup>182</sup> [Railways: North of England: Written question – 162584](#), 18 July 2018; this on the back of long-term concerns about electrification of the route, for more information see HC Library briefing paper [CBP 5907](#)

“allow the north to speak with one voice on the big decisions, to benefit the region as a whole”:

I would like to invite these cities to come together and work with the Government on the options for HS3, alongside a wider transport strategy for the north. I intend that this Government-led strategy will be developed with input from Network Rail, the Highways Agency as well as TfN, and will stretch from Liverpool to Sheffield, Hull and Newcastle.<sup>183</sup>

In the 2015 Budget George Osborne announced that legislation would be introduced to establish TfN as a statutory body.<sup>184</sup> Section 21 of the [Cities and Local Government Devolution Act 2016](#) provides for the establishment of STBs to advise on strategic transport decisions and priorities for the local area. TfN became the first STB on 1 April 2018, by virtue of the *Sub-national Transport Body (Transport for the North) Regulations 2018* ([SI 2018/103](#)).<sup>185</sup> TfN is tasked with setting out the requirements of the pan-Northern transport network through this [Strategic Transport Plan \(STP\)](#) for the North.

In March 2015 the Government published a transport strategy for the North, in partnership with TfN. It said that the Government would consider “all options for moving towards the 30 minute journey time ambition [between Manchester and Leeds], including options for tunnelling where necessary to improve speeds [... in] the next rail control period (2019-24)”.<sup>186</sup>

In the March 2016 update of the Northern Transport Strategy, TfN said:

... our work to date has indicated that in some cases achieving the vision in full might involve entirely new lines, or in other cases major upgrades to existing routes that are akin to a new line, such as major bypasses and cut-offs. Further work on route options and intermediate stations is being developed as outlined in our November 2015 report. On routes between Leeds and Manchester, and Manchester and Sheffield our work to date has shown that we need to go further than committed investments in the existing railway in order to achieve our vision for faster journeys and more frequent services. We are therefore developing a range of options, including new lines, that look at how we could achieve our longer term transformational vision, as well as accommodate the anticipated growth in freight.<sup>187</sup>

In its June 2017 report on integrated rail, it stated that:

There is a reasonable degree of certainty about the changes in supply that will occur in the short to medium term. In the longer term, HS2 Phases 2a and 2b will involve the provision of new infrastructure in the North, in 2027 and 2033 respectively under current plans. However, while work continues developing the Phase 2a and 2b propositions, only Phase 1 of the scheme (London – Birmingham) is committed at the moment. NPR [Northern Powerhouse Rail] is under development, and will be further refined by TfN over the remainder of 2017. NPR would

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<sup>183</sup> [HC Deb 27 October 2014, c8WS](#)

<sup>184</sup> HMT, [Summer Budget 2015](#), 8 July 2015, para 1.301

<sup>185</sup> Debated in Parliament on [18 December 2017](#) and [10 January 2018](#)

<sup>186</sup> DfT/TfN, [The Northern Powerhouse: One Agenda, One Economy, One North A report on the Northern Transport Strategy](#), 20 March 2015, p21

<sup>187</sup> TfN, [The Northern Transport Strategy: Spring 2016 Report](#), March 2016, p29

also be a long term, transformative infrastructure project in the North.<sup>188</sup>

In January 2018 TfN published its draft STP for consultation. It said that it “for the first time outlined its emerging vision for Northern Powerhouse Rail, a rapid, reliable and resilient rail network between the North’s six biggest cities and other economic centres”.<sup>189</sup> It stated that the “emerging vision” for NPR included:

- A new line between Liverpool and the HS2 Manchester Spur via Warrington
- Capacity at Piccadilly for around eight through services per hour
- A new Trans Pennine rail line that connects Manchester and Leeds via Bradford
- Significant upgrades along the corridor of the existing Hope Valley line between Sheffield and Manchester via Stockport
- Leeds to Sheffield delivered through HS2 Phase 2B and upgrading the route from Sheffield
- Leeds to Newcastle via HS2 junction and upgrades to the East Coast Mainline
- Significant upgrades to existing line from Leeds to Hull (via Selby) and Sheffield to Hull (via Doncaster)<sup>190</sup>

Further, on the trans-Penning XR4N route, it stated: “Alternative concepts will continue to be assessed between Liverpool – Manchester, Manchester – Sheffield, and Manchester – Leeds as part of developing a Strategic Outline Business Case for the programme”.<sup>191</sup>

And on integration with HS2 it stated:

TfN wants to ensure that Northern Powerhouse Rail is fully integrated into the planning of HS2 Phase 2B, to ensure both maximum value for money and that Northern Powerhouse Rail can be developed without delay.

To enable the possibility for Northern Powerhouse Rail services to make use of HS2 infrastructure, it is necessary to incorporate passive provision in the HS2 Phase 2B Hybrid Bill, with funding announced by the Chancellor in October 2017 intended to future proof HS2 for delivery of Northern Powerhouse Rail connectivity. A series of touchpoints between Northern Powerhouse Rail and HS2 Phase 2B have been identified across the Eastern (Sheffield to Leeds) and Western (Liverpool to Manchester) corridors, as well as at Manchester Piccadilly.

Integration with HS2 provides the opportunity for parts of the Northern Powerhouse Rail network to be delivered in an efficient way, using parts of an already committed scheme with an agreed programme. Together with the existing mainline route network,

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<sup>188</sup> TfN, [\*Initial Integrated Rail Report Strategic Transport Plan Evidence Base Report by Steer Davis Gleave commissioned by Transport for the North\*](#), 19 June 2017, executive summary

<sup>189</sup> TfN press notice, “[Northern leaders publish plan to transform the region](#)”, 16 January 2018

<sup>190</sup> TfN, [\*Strategic Transport Plan Draft for public consultation\*](#), January 2018, p46

<sup>191</sup> *Ibid.*, p46

HS2 and Northern Powerhouse Rail can create a flexible set of services to maximise the economic outcomes for the UK.

The government has been working closely with TfN in the development work for junctions. These are:

- Junctions in the Leeds area, enabling trains from Manchester, Sheffield and the Midlands to travel via Leeds and on to York and the North East. This could also release capacity for more local and commuter services east of Leeds
- Junctions in Cheshire to serve Liverpool via a new line, enabling services between Liverpool and Manchester via the HS2 Manchester spur, and offering the potential for faster Liverpool - London HS2 services on to the HS2 mainline
- Junctions at Manchester Piccadilly, which combined with a range of other interventions, would enable services from Manchester Airport and Liverpool to use either an underground Northern Powerhouse Rail through station or a surface turn-back station to continue east towards Leeds and the North East.
- A junction north of Sheffield at Clayton, enabling trains to run through Sheffield and re-join the HS2 mainline to Leeds (This is already being considered in the design by HS2 Ltd as part of the Phase 2B Hybrid Bill work).<sup>192</sup>

TfN's plans are shown in the graphic on the following page.<sup>193</sup>

An analysis of findings and responses to the consultation was published in June. The STP will become a statutory document in late 2018.<sup>194</sup>

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<sup>192</sup> Ibid., p46

<sup>193</sup> Taken from: TfN, [Northern Powerhouse Rail Booklet](#), 14 May 2018

<sup>194</sup> Ipsos MORI for TfN, [Draft Strategic Transport Plan and Integrated Sustainability Appraisal Consultation: Analysis of findings](#), June 2018, p2





## 6. High speed rail and Scotland

### 6.1 Background, 2010-15

The Scottish National Party (SNP) has called for HS2 to be extended to Scotland for a number of years and in 2012 it said it was considering building a separate high speed rail link between Edinburgh and Glasgow by 2024.<sup>195</sup> In June 2014, following the announcement of the Government's plans to look into 'HS3', Gordon MacDonald MSP, member of the Scottish Parliament's Infrastructure and Capital Investment Committee, said that "it is ridiculous that Westminster is extending the High Speed Rail network but without any consideration for Scotland ... There is an undeniable economic case to connect Scotland to the rest of the UK and the continent".<sup>196</sup>

In February 2015 the Scottish Infrastructure Secretary, Keith Brown, highlighted research by Greengauge 21 indicating that a high speed rail link between Scotland and Manchester could generate almost £25 billion for the UK economy. He said the Scottish Government was "committed to a genuinely national high-speed rail network" and expanded on this theme in a debate in the Scottish Parliament.<sup>197</sup>

Meanwhile, in November 2013 the Government and Transport Scotland instructed HS2 Ltd. to "identify ways to make further rail capacity and journey time improvements between northern England and Scotland for both passengers and freight. This will include looking to cut journeys from Glasgow and Edinburgh to London to 3 hours or less".<sup>198</sup> When questioned about it by the Transport Select Committee in November 2014 Sir David Higgins said that it would contain "a range of options, from ambitious schemes of an entirely new high-speed network or probably the more realistic ones, ones of upgrades and the staging of that".<sup>199</sup>

In September 2015 Keith Brown said that the final report would enable the Scottish Government to develop its planned high-speed line between Edinburgh and Glasgow.<sup>200</sup> There followed reports in early 2016 that the Edinburgh-Glasgow link had been 'shelved'.<sup>201</sup>

Background on debates about high speed rail in Scotland can be found in section 3.3 of HC Library briefing paper [RP 11/75](#)

<sup>195</sup> SNP press notice, "[SNP welcome commitment to high speed rail by 2024](#)", 12 November 2012

<sup>196</sup> SNP press notice, "[HS3 plans leave Scotland in the slow lane](#)", 23 June 2014

<sup>197</sup> "[Westminster challenged to commit to high-speed rail in Scotland](#)", *STV News*, 24 February 2015, and [Scottish Parliament motion S4M-12382](#), 24 February 2015

<sup>198</sup> DfT press notice, "[Next phase of work for High Speed 2 and Scotland](#)", 1 November 2013

<sup>199</sup> Transport Committee, [Oral evidence: HS2: update](#), HC 793, 17 November 2014, Q13

<sup>200</sup> "[Scots high-speed HS2 rail report suffers new delay](#)", *The Scotsman*, 3 September 2015

<sup>201</sup> see, e.g., "[High speed Glasgow-Edinburgh rail link plans 'shelved'](#)", BBC News, 15 January 2016; and "[Scottish Government has 'dropped' Glasgow to Edinburgh bullet train](#)", *The Scotsman*, 18 February 2016

## 6.2 UK and Scottish Government reports, March 2016

In March 2016 the UK and Scottish Governments published two reports on HSR to and within Scotland. The first report, produced by HS2 Ltd., considered various options including upgrades or new routes to deliver a three-hour journey time between the central belt of Scotland and London. These options fell under two headings: upgrades to existing routes and high speed options:

### Upgrades to existing routes

Upgrades to both the East and the West Coast Main Lines would be challenging and, within the footprint of the existing network, would deliver limited journey time savings, short of the three-hour journey time aspiration.

Achieving a three-hour journey time to Glasgow and Edinburgh through upgrades to existing lines would require around 137 miles of new high speed bypasses on the West Coast Main Line at a cost of between £17 billion and £19 billion and would present sustainability and engineering challenges similar to those for a new line.

On the unimproved sections of the railway, existing challenges regarding capacity, traffic mix, disruption and resilience would remain. Upgrades on the East Coast Main Line alone, with slightly fewer bypasses, could deliver a three-hour journey time to Edinburgh, but not Glasgow. This would cost between £11 billion and £13 billion without addressing the capacity issues; a solution addressing the capacity issues would cost up to £20 billion.<sup>202</sup>

### High speed options

A new high speed route from the northern end of Phase 2 to Scotland would involve more than 190 miles of new railway, and the potential to serve other city centres. It would increase capacity and reduce journey times, but it would have associated sustainability impacts.

A high speed route using the western leg of Phase 2 of HS2 could serve both Edinburgh and Glasgow by connecting to the mid-point of an Edinburgh to Glasgow high speed line. This would cost between £22 billion and £25 billion (excluding the cost of an Edinburgh to Glasgow high speed line).

A slightly different configuration to the west serving both Glasgow and Edinburgh would cost between £32 billion and £34 billion, while a route to the east would require significantly more infrastructure and cost anything between £27 billion and £43 billion.<sup>203</sup>

A separate report, published by Transport Scotland, concluded that the benefits of a high speed rail line between Glasgow and Edinburgh were “not considered to be sufficient in themselves to cover the very high cost of building a high speed link between Glasgow and Edinburgh as a free standing scheme”. A high speed line between Glasgow and

<sup>202</sup> HS2 Ltd., [\*Broad options for upgraded and high speed railways to the North of England and Scotland\*](#), 21 March 2016, p3

<sup>203</sup> *ibid.*, p4



Edinburgh would be possible, “but its feasibility is dependent on a commitment to extend high speed rail to Scotland”.<sup>204</sup>

The Scottish and UK Governments said that work would be carried out in 2017 to identify options with the best business case for implementation from 2019 onwards.<sup>205</sup> This was reiterated in the Government’s November 2016 announcement of its preferred route for Phase 2b of HS2 from Crewe to Manchester and the West Midlands to Leeds.<sup>206</sup>

## 6.3 Recent developments

As indicated in section 1.2, above, the SNP manifesto for the 2017 General Election said that: “Connecting Scotland to HS2 must be a priority, with construction beginning in Scotland as well as England, and a high speed connection between Glasgow, Edinburgh and the north of England as part of any high-speed rail network”.<sup>207</sup> In November 2017 the Scottish Government announced that feasibility studies were being commissioned to identify options to help improve train journey times, capacity, resilience and reliability on services between Scotland and England, with a focus on delivering three hour journeys between Scotland and London.<sup>208</sup>

Most recently, in May 2018 Greengauge 21 published a new paper looking ‘beyond HS2’. It proposed turning HS2 from a “Y” to an “X” shaped railway, with a new connection in the West Midlands meaning that HS2 trains could operate from Bristol and Cardiff to destinations in the Midlands, the North and Scotland. It also proposed a new line in Scotland to halve journey times between Edinburgh and Perth and speed up onward journeys to Inverness and Dundee/Aberdeen.<sup>209</sup>

Information on HSR is available on the [Transport Scotland website](#).

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<sup>204</sup> Transport Scotland, [High Speed Rail Scotland: Summary Report](#), 21 March 2016, p2

<sup>205</sup> DfT press notice, “[Three-hour Scotland to London rail journeys on track](#)”, 21 March 2016

<sup>206</sup> op cit., [High Speed Two: From Crewe to Manchester, the West Midlands to Leeds and beyond](#), pp59-60

<sup>207</sup> SNP, [Stronger for Scotland](#), May 2017, p20

<sup>208</sup> Scottish Government press notice, “[Cross-border rail improvements planned](#)”, 6 November 2017

<sup>209</sup> Greengauge 21, [Beyond HS2](#), 28 May 2018

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# HOUSE OF LORDS

Economic Affairs Committee

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6th Report of Session 2017–19

## **Rethinking High Speed 2**

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Evidence is published online at <https://www.parliament.uk/hleconomicaaffairs/publications> and available for inspection at the Parliamentary Archives (020 7219 3074).

Q in footnotes refers to a question in oral evidence.

## SUMMARY

Our 2015 report *The Economics of High Speed 2* raised a number of questions that the Government needed to answer on High Speed 2. Four years later, these have yet to be answered satisfactorily. This report addresses the unanswered questions on priorities for rail investment, the method used to appraise the High Speed 2 project and ways to reduce its cost.

### Priorities for rail investment

In 2015 we asked the Government to consider whether investment in rail infrastructure in the north should be prioritised over High Speed 2. But no assessment of the relative merits was carried out and over £4 billion has been spent already on the first phase of High Speed 2, which will run between Birmingham and London and has little benefit for northern cities. The second phase of the project, which will improve journey times between Leeds and Sheffield and alleviate pressure on some local services in the cities the new line will serve, awaits Parliamentary approval and is not expected to be complete until at least 2033.

The Government's priority for investment in British rail infrastructure should be the north of England. People travelling into northern cities are reliant on overcrowded and unreliable services. There has been a doubling of demand for local rail travel into central Manchester in the last 15 years but only a 50 per cent increase in passenger capacity. And many local services rely still on 'Pacer' trains, introduced by British Rail in the late 1970s, which were built cheaply using frames from Leyland National buses, to a design considered old fashioned for the rail network a century earlier.<sup>1</sup>

Rail connections between northern cities are poor. It takes just under an hour and a half to travel the 75 miles between Liverpool and Leeds by train, around the same time it takes to drive between the two cities. By contrast, it takes around two hours and a quarter to travel more than 200 miles between either city and London by train.

We are far from convinced by the Government's claim that the whole High Speed 2 project will be built within the £55.7 billion budget. The costs do not appear to be under control: Sir Terry Morgan, the former chairman of HS2 Ltd, told us that "nobody knows" what the final cost of the project will be. We are concerned that if costs overrun on the first phase of the project, there will be insufficient funding for the second phase and the northern sections of the new railway will not be built. The northern sections of High Speed 2 must not be sacrificed to make up for overspending on the railway's southern sections.

### *High Speed 2 and Northern Powerhouse Rail*

There is a plan—the Northern Powerhouse Rail Programme—to address comprehensively rail infrastructure improvements in the north through new lines and upgrades to existing lines. These works will not however begin until the mid-2020s and the whole programme is not expected to be completed until the end of the 2030s.

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1 Simon Bradley, *The Railways: Nation, Network and People*, (London: Profile Books Ltd, 2015) pp 233–234

We regret that construction of High Speed 2 started in the south rather than the north. If construction on the first phase of High Speed 2 had not started already, we would be urging the Government to prioritise rail links between northern cities, rather than improving links with London which are already good.

Representatives from northern cities said that the Northern Powerhouse Rail Programme could not be completed without the second phase of High Speed 2 being built. The planning and construction of Phase 2b of High Speed 2 and Northern Powerhouse Rail should therefore be treated as one programme. Decisions on the timing of works should be made according to the needs of the rail network in the north: work could begin on improving connections between northern cities without having to wait for the second phase of High Speed 2 to be constructed fully. In any case, funding for Northern Powerhouse Rail should be ringfenced and brought forward where possible.

### Appraisal method for High Speed 2

The existing appraisal process for large infrastructure projects such as High Speed 2 is inappropriate. The appraisal method takes insufficient account of the transformative effect on local economies that the new railway may bring and it places too much emphasis on travel time savings. The estimated benefits of the project are very sensitive to demand forecasts for High Speed 2, particularly demand from business travellers, and the monetary value placed on travellers' time. But the evidence behind both assumptions is unconvincing.

We are concerned this appraisal process has driven the decision to build a railway to operate initially at a maximum speed of 360 kilometres per hour, faster than any railway operates in the world at present.<sup>2</sup>

A new appraisal of the business case, which takes account of the issues raised in this report, is essential and the final decision to proceed with the High Speed 2 project should await that assessment. Given the substantial sum of money already spent on the project, that assessment should be published urgently.

### Reducing costs

New analysis of the project is needed. With less emphasis on reducing journey times, the Government could reduce the cost of the project by designing a railway with a lower operating speed. A lower speed would provide the opportunity for a less expensive route alignment, reducing the need for tunnelling. Despite this Committee's recommendation to do so in its 2015 inquiry on High Speed 2, the Government has not explored the cost saving that could be achieved from this option.

The cost of the project could also be reduced if the London terminus of the new railway was at Old Oak Common in west London rather than Euston station (which requires expensive tunnelling underneath London). Again, despite this Committee's recommendation in 2015, this option has not been examined properly since 2010 and that analysis has not been made public.

2 'World's Fastest Bullet Train Starts High-Speed Tests', *Bloomberg*, 10 May 2019: <https://www.bloomberg.com/news/articles/2019-05-10/world-s-fastest-bullet-train-starts-high-speed-tests-in-japan> [Accessed 10 May 2019]



With the Elizabeth Line (the new west-east railway line across London being constructed under the Crossrail programme) due to provide a fast connection between Old Oak Common and central London, it is not clear why an expensive redevelopment of Euston to accommodate High Speed 2 is necessary.

Notwithstanding the result of that assessment, Old Oak Common should be the London terminus for Phase 1 (London to Birmingham) and Phase 2a (Crewe to Birmingham) of the project. This will also permit an earlier start on the northern sections.

## SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

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### Priorities for rail investment

1. The conclusions in our 2015 report on capacity problems remain valid: overcrowding is a problem on commuter services rather than long-distance services. This is a problem that High Speed 2 addresses indirectly and in full only for London commuters using Euston, who will be the main beneficiaries of the overcrowding relief provided by the project. (Paragraph 36)
2. The evidence suggests that Northern Powerhouse Rail is required more urgently than High Speed 2. If construction on High Speed 2 had not started already, we would recommend investing in northern rail infrastructure first. Northern Powerhouse Rail will better address overcrowding in the north and improve rail connections between northern cities that are poor at present, in contrast to north-south connections which are already good. (Paragraph 37)
3. Construction on High Speed 2 should have started in the north. The decision to build High Speed 2 from the south upwards means that London, already the city expected to gain most from the project, will also receive the benefits of the new railway long before northern cities will. (Paragraph 38)
4. Representatives from the north were clear they require both High Speed 2 Phase 2b and the Northern Powerhouse Rail Programme. Given the integration of the projects, the Government should consider Phase 2b and Northern Powerhouse Rail as one programme, rather than two separate programmes. A combined programme would allow investment in rail infrastructure in the north to be prioritised where it is needed most. (Paragraph 39)
5. In any case, funding for the Northern Powerhouse Rail needs to be ringfenced and brought forward where possible. Investment in rail infrastructure in the north is required urgently, and we do not see why High Speed 2 and Crossrail 2 are being prioritised over Northern Powerhouse Rail. (Paragraph 40)

### Costs and appraisal of High Speed 2

6. We have serious reservations about the cost-benefit analysis used in determining whether High Speed 2 provides value for money. Cost-benefit analysis is an important discipline for comparing the merits of different projects. But it has serious limitations as a technique for examining the transformational benefits that new infrastructure can provide. (Paragraph 62)
7. We do not believe that asking business rail travellers hypothetical questions—about how much they would be willing to pay for quicker journeys—is the most robust evidence base on which to base a calculation of the benefits that a £55.7 billion new railway will bring. (Paragraph 71)
8. We are concerned particularly that the time saved by long-distance rail business travellers has increased in value for the purposes of appraisal since our 2015 report, on the strength seemingly of a few hundred interviews carried out on station platforms. (Paragraph 74)
9. We welcome attempts to update the evidence for travel time savings. But the new values are based on unconvincing data. We note that 60 per cent of the estimated benefits of High Speed 2 (£55 billion) relate to business travel. (Paragraph 80)

10. The Government maintain the demand forecasts for long-distance rail are “conservative”. But for some of the routes which the modelling for High Speed 2 anticipates will provide the most benefits, this is not borne out by the observed demand growth in recent years. (Paragraph 92)
11. The forecast benefits of the project are very sensitive to the levels of demand predicted by HS2 Ltd’s model materialising: a revision to forecasts GDP per head growth in the latest business case caused the estimated benefits of the project to fall by £10 billion. We note HS2 Ltd’s analysis does not factor in the effect on business travel that developments in communications technology may have. (Paragraph 93)
12. The estimated benefits of High Speed 2 are highly dependent on the forecast numbers of business travellers on long-distance rail. The evidence upon which the number of business travellers used in HS2 Ltd’s modelling is based is now around 15 to 20 years old. It does not appear to correspond to the proportion of journeys undertaken for business that the most recent data from the National Travel Survey and the National Passenger Survey show. (Paragraph 107)
13. The sensitivities of the estimated benefits of High Speed 2 to values of time and demand forecasts demonstrate how important it is to the business case that the new railway is designed to be as fast as possible. (Paragraph 108)
14. New analysis of the project is needed which takes account of the transformative effects, including allowing for changes in land use, that new infrastructure can have. The assumptions behind values of travel time and the demand forecasts should be revised ahead of this new analysis. This analysis should be published alongside the full business case by the end of 2019. (Paragraph 109)

### **Reducing the cost of High Speed 2**

15. Our 2015 report recommended that the Government should review the cost saving from lowering the maximum speed of the railway. This work has not been carried out and it is disappointing that the Government’s rejection of the idea remains based on an assessment from 2012. (Paragraph 127)
16. We do not see why High Speed 2 is being built to accommodate trains operating at 400 kilometres per hour when the initial maximum operating speed will be 360 kilometres per hour, which itself is faster than the maximum operating speed of any railway in the world. The differences in journey times between a railway operating at 360 kilometres per hour, and one operating at 300 kilometres per hour, are minimal. (Paragraph 128)
17. We are concerned that the flawed appraisal method, where the vast majority of the project’s benefits are reliant on faster journey times, is behind the Government’s unwillingness to reduce the cost of the project by designing a railway to run at a lower speed. An appraisal method that took more account of the transformative effects of new infrastructure would be less sensitive to small changes in journey times. (Paragraph 129)
18. For Phase 1, the Government should instruct HS2 Ltd to update and publish its analysis of the cost saving that would be made from designing the line to a lower maximum operating speed. (Paragraph 130)

19. For Phase 2b, the 2016 analysis by Atkins suggested substantial cost savings could be achieved by alterations to the route and design of the railway. Further analysis of those options should be carried out and published. (Paragraph 131)
20. It is disappointing that the Government ignored our recommendation to assess the cost saving that could be made by terminating the line at Old Oak Common rather than Euston. The Government and HS2 Ltd cite a 2011 report from Atkins as the evidence base for rejecting the proposal, but that report assessed only the reduction in benefits and made no estimate of the possible cost saving. (Paragraph 151)
21. The Government has argued that High Speed 2 has to finish in 'central London', which is taken to mean Euston. But this does not follow. What matters is not the single point of the terminus, but the connections that enable passengers to get to their final destination. Onward journey times to final destinations using the Elizabeth Line from Old Oak Common appear in most cases to be comparable, or better than, continuing from Old Oak Common on High Speed 2 to Euston. (Paragraph 152)
22. We agree with Sir Terry Morgan that the redevelopment of Euston station should be removed from the scope of Phase One of High Speed 2. Old Oak Common should operate as the London terminus for Phase One and Phase 2a. (Paragraph 153)
23. Postponing the redevelopment of Euston station to Phase 2b will allow time for a full assessment of the modifications required to allow Old Oak Common to operate as the London terminus to the full High Speed 2 network, and the cost saving that would achieve relative to a terminus at Euston. (Paragraph 154)
24. The Government should publish its analysis of the cost savings from reducing speed and terminating at Old Oak Common alongside the full business case by the end of 2019. (Paragraph 155)

# Rethinking High Speed 2

## CHAPTER 1: INTRODUCTION

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“There are fast growing, infrastructure constrained cities spread across the regions of the UK, and addressing these constraints is the greatest opportunity for infrastructure to help each region to do better. Most major UK cities lag behind national productivity levels. This contrasts with large cities in many other European countries, which add to their countries’ productivity.” National Infrastructure Commission, July 2018<sup>3</sup>

1. The Committee fully supports investment in British rail infrastructure. But the present plan for High Speed 2 risks spending a large sum of public money on a project which addresses the wrong priorities for the railway network. As we concluded in our 2015 report *Economics of High Speed 2*, “there should be no embarrassment in being prepared to revise the project: the objectives and cost are too important.”<sup>4</sup>
2. Our 2015 report raised questions about the High Speed 2 project which the Government failed to answer. This report follows up on those unanswered questions in the context of three factors which require the Government to revise the project:
  - The rail network in the north of England requires investment as soon as possible: overcrowding is a major problem on commuter services in northern cities and connections between northern cities are poor;
  - The costs do not appear to be under control: the budget for the project is £55.7 billion but Sir Terry Morgan, the former chairman of HS2 Ltd, told us that “nobody knows” what the final cost of the project will be;
  - The Government’s cost-benefit analysis of the project needs revising—a more comprehensive analysis of High Speed 2 would give greater weight to the economic development opportunities the new railway would create and less emphasis on reductions in journey time.
3. Chapter 2 considers where rail investment should be prioritised, Chapter 3 examines the cost and appraisal of the High Speed 2 project and Chapter 4 considers how the cost of the project could be reduced.
4. Since 2015, Parliament has legislated for Phase 1 of High Speed 2. The legislation for Phase 2a had its second reading in the House of Commons in January 2018 and the legislation for Phase 2b is expected to be introduced in 2020.

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3 National Infrastructure Commission, ‘National Infrastructure Assessment’, July 2018: [https://www.nic.org.uk/wp-content/uploads/CCS001\\_CCS0618917350-001\\_NIC-NIA\\_Accessible.pdf](https://www.nic.org.uk/wp-content/uploads/CCS001_CCS0618917350-001_NIC-NIA_Accessible.pdf) [accessed 1 May 2019]

4 Economic Affairs Committee, *Economics of High Speed 2* (1st Report, Session 2014–15, HL Paper 134)

## CHAPTER 2: PRIORITIES FOR RAIL INVESTMENT

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5. This chapter considers overcrowding problems on the rail network, improving rail connections for northern cities and where investment in rail infrastructure should be prioritised.

### Capacity problems on the rail network

6. The latest strategic case for High Speed 2 said the project was a “once in a generation opportunity” to improve rail services on the West Coast and East Coast Main Lines:

“HS2 will deliver a step change in capacity on the UK’s long distance rail network. By providing direct intercity services on dedicated high speed lines, HS2 will free up train paths and platforms on the heavily congested WCML and ECML. This presents a once in a generation opportunity to improve services on these corridors, including passenger services to locations not directly served by HS2, and freight services. This will not only improve passenger experience by reducing overcrowding on peak time trains but will also allow train operators to run more varied and frequent services.”<sup>5</sup>

7. Our 2015 report accepted that the West Coast Main Line was nearing full capacity in terms of train paths but that technological innovations, such as in-cab signalling, could release capacity. We concluded “we have not seen convincing evidence that the nature of the capacity problem warrants building HS2.”<sup>6</sup> This was because:
  - Present overcrowding on long-distance services on the West Coast Main Line appeared largely to be a problem on Friday evenings and weekend services;<sup>7</sup>
  - No long-distance trains had passengers in excess of capacity<sup>8</sup>, and passengers found to be standing on long-distance services were commuters using services to travel short-distances;<sup>9</sup>
  - The main beneficiaries of the overcrowding relief provided by High Speed 2 will be London commuters on the West Coast Main Line.<sup>10</sup>

### Overcrowding on commuter services

8. Our follow-up work focused on overcrowding on commuter services. Table 1 details the percentage of passengers standing on long-distance and commuter services arriving at, and departing from, Birmingham, Leeds, London Euston, Manchester Piccadilly and Sheffield in 2017.

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5 Department for Transport, *High Speed Two: Phase Two Strategic Case*, (July 2017): [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/629393/high-speed-two-phase-two-strategic-case.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/629393/high-speed-two-phase-two-strategic-case.pdf) [accessed 1 May 2019]

6 Economic Affairs Committee, *The Economics of High Speed 2*, p 5

7 Our 2015 report said that the first off-peak services on a Friday evening, when cheaper tickets become available, and weekend services, particularly for sporting events such as when Manchester United Football Club had a home fixture, were the times when overcrowding was a problem on Virgin Trains services between London Euston and Manchester Piccadilly. Economic Affairs Committee, *The Economics of High Speed 2*, p 49

8 Train capacity includes an allowance for some standing passengers.

9 For example, commuters travelling from Stockport to Manchester Piccadilly on a Virgin Trains service. Economic Affairs Committee, *The Economics of High Speed 2*, p 53

10 Economic Affairs Committee, *The Economics of High Speed 2*, p 54

**Table 1: Percentage of passengers standing in the peak hours on a typical autumn weekday by city in 2017 (fast long distance services are highlighted in bold)<sup>11</sup>**

City	Train operator	AM peak arrivals (0700–0959)	PM peak departures (1600–1859)
Birmingham	Arriva Trains Wales	0%	11%
	Chiltern Railways	17%	7%
	CrossCountry	5%	7%
	<b>Virgin Trains West Coast</b>	<b>3%</b>	<b>8%</b>
	West Midlands Trains	18%	14%
Leeds	CrossCountry	2%	4%
	<b>London North Eastern Railway</b>	<b>0%</b>	<b>0%</b>
	Northern	13%	10%
	TransPennine Express	16%	15%
London Euston	London Overground <sup>12</sup>	55%	52%
	<b>Virgin Trains West Coast</b>	<b>2%</b>	<b>2%</b>
	West Midlands Trains	21%	18%
Manchester	Arriva Trains Wales	10%	5%
	CrossCountry	0%	13%
	East Midlands Trains	12%	0%
	Northern	15%	10%
	TransPennine Express	23%	17%
	<b>Virgin Trains West Coast</b>	<b>4%</b>	<b>1%</b>
Sheffield	CrossCountry	5%	1%
	<b>East Midlands Trains</b>	<b>0%</b>	<b>1%</b>
	Northern	5%	7%
	TransPennine Express	13%	12%

Source: Department for Transport, 'Rail passenger numbers and crowding on weekdays in major cities in England and Wales: 2017', Table RAI0214, 24 July 2018: <https://www.gov.uk/government/statistics/rail-passenger-numbers-and-crowding-on-weekdays-in-major-cities-in-england-and-wales-2017> [accessed 1 May 2019]

9. Table 1 indicates that the fast long-distance services are amongst the least crowded trains that serve the cities that will be on the High Speed 2 line.

<sup>11</sup> The overcrowding figures are based on the number of people on the train when it is at its busiest, which is when it departs from, or arrives at, the cities listed.

<sup>12</sup> London Overground trains are designed to accommodate large numbers of standing passengers and have longitudinal seating (similar to trains on the London Underground).



10. Ben Still, Managing Director of the West Yorkshire Combined Authority, said that for the cities in the north, “there is more overcrowding on the commuter routes.”<sup>13</sup> The problem was that “many of the trains are serving dual purposes; they are both inter-city and semi-fast, and serving commuter markets”:

“For example, the trans-Pennine services between York, Leeds and Manchester are most congested between Leeds and Manchester. They are at the very most congested from Leeds into Huddersfield, and in those areas there is standing room only.”<sup>14</sup>

11. He said there was also overcrowding on the fast long-distance services that are also used by commuters, but he accepted that present overcrowding problems were “a commuter and short-distance issue.”<sup>15</sup>
12. Simon Warburton, Transport Strategy Director at Transport for Greater Manchester, said that “rolling stock capacity and train capacity are now falling well behind passenger demand ... Rail demand into central Manchester has doubled in the last 15 years but there had been only a 50 per cent increase in rolling stock capacity”.<sup>16</sup>

### *High Speed 2 and overcrowding relief*

13. Bridget Rosewell, founder of Volterra Partners, said that High Speed 2, by taking long-distance trains off the West Coast Main Line, would free up capacity for more commuter services: “you may well need the routes that are currently used for Manchester to London to be able to use more Stockport services, for example, which cannot be run because that capacity is used for the fast trains.”<sup>17</sup>
14. Chris Stokes, an independent rail consultant, however pointed out that the existing long-distance services on the West Coast Main Line already primarily serve commuters:

“If you take the morning peak as an example, there are two trains that arrive in Manchester before 9 am—only two trains during the morning peak ... one of those trains goes via Stoke and Macclesfield, and is not full of people who left Euston at half past six in the morning but full of people from Stoke and Macclesfield, while the other train goes via Crewe and Wilmslow and is similarly full of people from Crewe to Wilmslow. So those trains would have to run anyway, the position with Leeds is exactly the same, and the amount of additional train path capacity that HS2 brings to the northern cities is pretty much zero.”<sup>18</sup>

15. As we concluded in our 2015 report, the main beneficiaries of overcrowding relief from High Speed 2 will be London commuters who use the West Coast Main Line. The benefits to these commuters were made clear in a report by Steer Davies Gleave for the Department for Transport in 2017:

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13 [Q 55](#) (Ben Still)

14 [Q 55](#) (Ben Still)

15 [Q 55](#) (Ben Still)

16 [Q 55](#) (Simon Warburton)

17 [Q 41](#) (Bridget Rosewell)

18 [Q 41](#) (Chris Stokes). As we concluded in our 2015 report, it is likely that the standing passengers on long-distance services shown in Table 1 result from commuters using the services to travel short distances.



“Introducing extra train services to Milton Keynes when HS2 is built would decrease the crowding on services to Milton Keynes that depart London Euston between 5pm and 6pm. Load factors on these services were 115 per cent in 2015 (i.e. 15 percent more passengers than seats). The transfer of long distance passengers to HS2 services in 2026 and the introduction of additional services on the existing network could mean a fall in the load factor to 81 per cent for Milton Keynes passengers.”<sup>19</sup>

16. Chris Stokes said High Speed 2 was “a very expensive way of dealing with the Milton Keynes-Euston commuter peak.”<sup>20</sup>

### *Northern Powerhouse Rail and overcrowding relief*

17. High Speed 2 will therefore offer limited benefits for addressing current overcrowding problems outside of London. But one project which would address these issues more comprehensively is the Northern Powerhouse Rail Programme.
18. Transport for the North published a ‘Strategic Transport Plan’ in February 2019 which outlined the scope of the programme. It consists of new lines, improvements to existing lines and improvements that will come from Phase 2b of High Speed 2. The programme is summarised in Box 1.

### **Box 1: Summary of the main improvements under Northern Powerhouse Rail**

The main improvements under the programme include:

- Faster and more frequent links between Liverpool and Manchester Piccadilly via Warrington and Manchester Airport, including integrated hub stations at Liverpool City Centre and at Manchester Airport serving HS2, Northern Powerhouse Rail and local services;
- A new hub station at Manchester Piccadilly, including Northern Powerhouse Rail;
- Faster links between Manchester and Leeds, via a new line serving Bradford;
- Significant upgrades along the corridor of the existing Hope Valley Line between Sheffield and Manchester (via Stockport);
- Leeds-Sheffield delivered through HS2 Phase 2b and upgrading the route from Sheffield to/from the North;
- Leeds-Newcastle via a junction off HS2 and significant upgrades to the East Coast Mainline corridor (via York, Darlington and Durham);
- Significant upgrades to the existing lines from Leeds to Hull and Sheffield to Hull.

Source: Transport for the North, ‘Strategic Transport Plan’, 7 February 2019: <https://transportforthenorth.com/wp-content/uploads/TfN-final-strategic-transport-plan-2019.pdf> [accessed 1 May 2019]

19. Mr Warburton explained how a segregated railway between northern cities would address commuter issues:

19 Steer Davies Gleave, ‘HS2 Released Capacity Study: Summary Report’, July 2017: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/629168/high-speed-two-phase-two-strategic-case-appendix-hs2-released-capacity-study-summary-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/629168/high-speed-two-phase-two-strategic-case-appendix-hs2-released-capacity-study-summary-report.pdf) [accessed 1 May 2019]

20 [Q 42](#) (Chris Stokes)

“[It] would allow us finally to deal with a railway that at the moment tries to do two things: to link city pairs and to provide commuter options. Frankly, it does neither of those things particularly well at the moment. The journey times between the cities are held back by the commuter, and the commuter is frustrated by the city-to-city movement that often means that services do not stop en route.”<sup>21</sup>

20. He gave Huddersfield as an example of a place where Northern Powerhouse Rail would benefit commuters, providing easier access for residents to Manchester and Leeds:

“At present, its residents are frustrated by a railway service which does not serve them as well as it could, because that rail service is also trying to run as fast as possible between two cities. If we remove the city-to-city connectivity from that rail line through a segregated railway, Huddersfield starts to present itself as a real locational choice for individuals, couples and families with talent so that they can look through their careers to trade across two northern cities rather than one.”<sup>22</sup>

### Improving rail connections for northern cities

#### *Northern Powerhouse Rail*

21. The Northern Powerhouse Rail Programme is expected to reduce substantially journey times between northern cities. The improvements it will bring are shown for selected routes in Table 2 and Figure 1.

**Table 2: Current service frequency and journey times between selected northern cities and expected improvements following Northern Powerhouse Rail**

Train route	Best existing frequency and journey time		Best possible frequency and journey time with Northern Powerhouse Rail	
	Number of services per hour	Journey time (minutes)	Number of services per hour	Journey time (minutes)
Newcastle-Leeds	3	88-95	4	58
Leeds-Hull	1	57	2	38
Sheffield-Leeds	1	39-42	4	28
Sheffield-Hull	1	80-86	2	50
Manchester-Sheffield	2	49-57	4	40
Leeds-Manchester	4	46-58	6	25
Liverpool-Manchester	4	37-57	6	26

Source: Transport for the North, ‘Strategic Transport Plan’, 7 February 2019, p 112: <https://transportforthenorth.com/wp-content/uploads/TfN-final-strategic-transport-plan-2019.pdf> [accessed 1 May 2019]

21 Q 49 (Simon Warburton)

22 Q 60 (Simon Warburton)

**Figure 1: Northern Powerhouse Rail Programme (including junctions with High Speed 2)**



Source: Transport for the North, *At a glance Northern Powerhouse Rail*, [https://transportfornorth.com/wp-content/uploads/TFTN - NPR At a Glance.pdf](https://transportfornorth.com/wp-content/uploads/TFTN_-_NPR_At_a_Glance.pdf) [accessed 10 May 2019]

22. Barry White, chief executive of Transport for the North, said that transport links between northern cities had “held the jobs market back”. He said the benefits of the Northern Powerhouse Rail, although expressed in terms of journey time improvements, “are much more economically based and are about economic opportunities for individuals.” He gave Bradford to Manchester as an example:

“It is currently an hour’s journey. Under Northern Powerhouse Rail that journey will reduce to 20 minutes. Bradford is a very big northern city that is very poorly connected, so practically speaking this is a transformation opportunity that would allow Bradford citizens to access a wider jobs market or to study in Manchester but to continue to live at home, for instance.”<sup>23</sup>

### *High Speed 2*

23. The existing journey times between London and northern cities, and the improvements High Speed 2 will bring, are shown in Table 3.

**Table 3: Current journey times between London Euston and northern cities and expected improvements following High Speed 2**

London to	Existing journey time (minutes)	Journey time with HS2 (minutes)
Leeds	131	81
Liverpool	134	94
Manchester Piccadilly	127	67
Newcastle	170	137
Sheffield	121	87

Source: Department for Transport, ‘High Speed Two Phase Two Strategic Case’, July 2017, p 5: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/629393/high-speed-two-phase-two-strategic-case.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/629393/high-speed-two-phase-two-strategic-case.pdf) [accessed 1 May 2019]

24. The Government’s latest economic case for High Speed 2 however showed that London receives the most benefits from the full High Speed 2 network. Its distribution by region of the transport user benefits estimated to result from the project is reproduced in Table 4.

**Table 4: Distribution of the transport user benefits of High Speed 2 project by region, according to where a long-distance trip starts and finishes (figures are proportions from HS2 Ltd’s modelling for 2037)**

Region	Full network	Phase 2a increment	Phase 2b increment
London	40%	43%	36%
South East	3%	3%	3%
West Midlands	12%	1%	5%
North West	18%	39%	13%
East Midlands	4%	1%	7%

23 [Q 49](#) (Barry White)

Region	Full network	Phase 2a increment	Phase 2b increment
Yorkshire and Humber	10%	3%	17%
North East	4%	0%	6%
Scotland	5%	4%	7%
Other (East England, South West, Wales)	3%	5%	4%

Source: HS2 Ltd, 'High Speed Two (HS2): Phase Two Economic case advice for the Department for Transport', Appendix 5, July 2017: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/628526/CS866\\_A\\_HS2\\_Phase\\_2a\\_Economic\\_case.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/628526/CS866_A_HS2_Phase_2a_Economic_case.pdf) [accessed 1 May 2019]

25. In terms of wider economic benefits, Tim Wood, Northern Powerhouse Rail Director at Transport for the North, said that “HS2 is the spine for us to see big businesses and opportunities in London and Birmingham coming to the north and to see that agglomeration effect that will happen.”<sup>24</sup>
26. The Committee’s 2015 inquiry however heard evidence that London was likely to be the biggest beneficiary from agglomeration (agglomeration refers to the productivity gains that occur when improved transport links allow easier interaction between businesses and give businesses greater access to the labour market, as businesses and workers are brought closer together). Witnesses said that High Speed 2 may encourage longer-distance commuting to London and the evidence from France’s experience of high speed rail was that Paris had benefitted more than other cities.<sup>25</sup> An academic study of high speed rail across different countries found that “for regions and cities whose economic conditions compare unfavourably with those of their neighbours, a connection to the [high speed] line may even result in economic activities being drained away and an overall negative impact.”<sup>26</sup>

### Prioritisation of rail infrastructure projects

27. The National Infrastructure Commission published its first ‘National Infrastructure Assessment’ in July 2018. It set out the ‘fiscal remit’ for infrastructure projects up to 2050 and recommended the Government adopt the funding profile for High Speed 2, Crossrail 2 and Northern Powerhouse Rail shown in Table 5. The Government will respond to the Assessment when it sets out its long-term funding plans following the Spending Review, which is expected later this year.<sup>27</sup>

24 Q 52 (Tim Wood)

25 Economic Affairs Committee, *The Economics of High Speed 2*, p 84

26 Albalet and Bel, ‘High Speed Rail: Lessons for Policy Makers from Experiences Abroad’, *Public Administration Review*, Vol. 72, Issue 3 (May/June 2012), p 346: <https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1540-6210.2011.02492.x> [Accessed 1 May 2019]

27 HM Treasury, ‘Interim Response to the National Infrastructure Assessment Budget 2018’, October 2018: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/752340/NIA\\_Interim\\_Response\\_pdf.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752340/NIA_Interim_Response_pdf.pdf) [accessed 1 May 2019]

**Table 5: National Infrastructure Assessment and fiscal remit for High Speed 2, Crossrail 2 and Northern Powerhouse Rail**

Project	Average annual expenditure over five year time period (2018/19 prices)				Total
	2020–2025	2025–2030	2030–2035	2035–2040	
High Speed 2	£4.5 billion	£3.9 billion	£900 million	n/a	<b>£46.5 billion</b>
Crossrail 2	£200 million	£2.2 billion	£2.9 billion	n/a	<b>£26.5 billion</b>
Northern Powerhouse Rail	£200 million	£1.1 billion	£1.7 billion	£1.8 billion	<b>£24 billion</b>

Source: National Infrastructure Commission, ‘National Infrastructure Assessment’, July 2018, Table 7.1: [https://www.nic.org.uk/wp-content/uploads/CCS001\\_CCS0618917350-001\\_NIC-NIA\\_Accessible.pdf](https://www.nic.org.uk/wp-content/uploads/CCS001_CCS0618917350-001_NIC-NIA_Accessible.pdf)

28. High Speed 2 and Crossrail 2 receive more funding under the proposed fiscal remit and receive it sooner.
29. Barry White, chief executive of Transport for the North, said the “high level cost estimate” for the Northern Powerhouse Rail Programme was £39 billion. He said the new lines would have to go through a hybrid bill process: “we have been told that would start in 2024 at the earliest ... and would take about three and a half years.” Construction could start at the end of the 2020s and “would be complete by the end of the 2030s.” Upgrading the existing lines “could start in the mid-2020s.”<sup>28</sup>
30. Chris Stokes said that “there is an opportunity cost about these projects, and for example I think Northern Powerhouse Rail will not be the scheme it might be if we were not spending all this money on High Speed 2.” On Channel 4’s ‘Dispatches’ programme in February 2019, the Mayor of Greater Manchester, Andy Burnham said that while both programmes were important for the north, he would prioritise the Northern Powerhouse Rail Programme if he had to choose between them. He described Northern Powerhouse Rail as “the single highest transport investment priority for our country.”<sup>29</sup>

### *Dependency of Northern Powerhouse Rail on High Speed 2*

31. Representatives from the north who gave evidence to our inquiry argued that both projects were required. Ben Still said the choice was “akin to saying that you need only the M1 or the M62”:

“Through these programmes we are having to rectify decades of underinvestment in the north of England. Strong and efficient north-south routes are required, as are better east-west routes. Northern Powerhouse Rail is about joining up all the core metropolitan areas of

28 **Q 50** (Barry White). Mr White said the upgrade of existing lines “could go through Network Rail’s existing industry processes and be ready to go in what Network Rail would refer to as control period seven—the next period of investment.”

29 ‘HS2: The Great Train Robbery: Channel 4 Dispatches’, *Channel 4*, (11 February 2019): <https://www.channel4.com/press/news/hs2-great-train-robbery-channel-4-dispatches> [accessed 1 May 2019]



the north using the elements of HS2 that make sense and infilling where necessary.”<sup>30</sup>

32. He said the Northern Powerhouse Rail Programme could not work without High Speed 2. Barry White explained that as planned presently, Northern Powerhouse Rail used High Speed 2’s infrastructure in three places:

“the tunnel coming north into Manchester from Manchester Airport; east of Leeds heading out to York; and south of Leeds heading towards Sheffield. Because the Government have committed to HS2, we have planned on the basis of HS2 being delivered. Therefore, to make the best value-for-money proposals, we have used spare capacity on those tracks where available to make what we think is a very sensible proposition for Northern Powerhouse Rail. We are reliant on HS2 to that extent.”<sup>31</sup>

33. The links between High Speed 2 and Northern Powerhouse Rail are described in more detail in Figure 1. Chris Stokes was less convinced about the interdependency of the two projects: “The linkage between the two is not very strong, because Northern Powerhouse Rail is really about east-west access; obviously, HS2 is about north-south access.”<sup>32</sup>

34. Simon Warburton said that delivering only one of the programmes would not deliver the economic benefits:

“The level of transformation talked about in the northern powerhouse independent economic review is equivalent to trebling the size of the employment market in Manchester city centre and to nearly trebling the size of the employment market in our neighbouring city centre in Leeds and so on across the north ...

... the level of demand that that level of growth brings with it means that a choice between HS2 and NPR is not realistic in bringing about economic transformation. To deliver only one of those two elements will not bring about a northern powerhouse transformation.”<sup>33</sup>

35. Tim Wood agreed: “It is a programme—a network—so it requires High Speed 2 and the trans-Pennine upgrade, and it requires NPR to be built in full.”<sup>34</sup>

36. **The conclusions in our 2015 report on capacity problems remain valid: overcrowding is a problem on commuter services rather than long-distance services. This is a problem that High Speed 2 addresses indirectly and in full only for London commuters using Euston, who will be the main beneficiaries of the overcrowding relief provided by the project.**

37. **The evidence suggests that Northern Powerhouse Rail is required more urgently than High Speed 2. If construction on High Speed 2 had not started already, we would recommend investing in northern rail infrastructure first. Northern Powerhouse Rail will better address overcrowding in the north and improve rail connections between**

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30 [Q 53](#) (Ben Still)

31 [Q 53](#) (Barry White)

32 [Q 38](#) (Chris Stokes)

33 [Q 51](#) (Simon Warburton)

34 [Q 52](#) (Tim Wood)

**northern cities that are poor at present, in contrast to north-south connections which are already good.**

38. **Construction on High Speed 2 should have started in the north. The decision to build High Speed 2 from the south upwards means that London, already the city expected to gain most from the project, will also receive the benefits of the new railway long before northern cities will.**
39. *Representatives from the north were clear they require both High Speed 2 Phase 2b and the Northern Powerhouse Rail Programme. Given the integration of the projects, the Government should consider Phase 2b and Northern Powerhouse Rail as one programme, rather than two separate programmes. A combined programme would allow investment in rail infrastructure in the north to be prioritised where it is needed most.*
40. *In any case, funding for the Northern Powerhouse Rail needs to be ringfenced and brought forward where possible. Investment in rail infrastructure in the north is required urgently, and we do not see why High Speed 2 and Crossrail 2 are being prioritised over Northern Powerhouse Rail.*



## CHAPTER 3: COSTS AND APPRAISAL OF HIGH SPEED 2

41. This chapter sets out the planned cost of HS2 and examines the method by which the Department for Transport has determined the project provides value for money.

### Planned cost of High Speed 2

42. The Spending Review 2015 set the funding for High Speed 2 at £55.7 billion in 2015 prices. The latest breakdown of cost between the different phases of the project is in Table 6. Nusrat Ghani MP, Minister for HS2, said that the project “will be delivered within the envelope provided at £55.7 billion.”<sup>35</sup>

**Table 6: Breakdown of the £55.7 billion HS2 funding envelope (2015 prices)**<sup>36</sup>

Project phase	Budget
Phase 1: London-West Midlands	£27.18 billion
Phase 2a: West Midlands-Crewe	£3.48 billion
Phase 2b: West Midlands-Leeds/Manchester	£25.07 billion

Source: Department for Transport, ‘High Speed Two Phase Two Financial Case’, July 2017, p 7: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/629165/high-speed-two-phase-two-financial-case.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/629165/high-speed-two-phase-two-financial-case.pdf) [accessed 1 May 2019]

43. The Spending Review 2015 increased costs in line with inflation (at the time of our 2015 report, the total cost of the project was £50.1 billion in 2011 prices). Adjusting for construction price inflation since 2015 would suggest a cost in today’s prices of around £59 billion.<sup>37</sup>
44. HS2 Ltd told the Committee that spending to date on the project was £4.3 billion. The main costs have been £1.8 billion on land and property purchases and £1.3 billion on “indirect costs” such as consultation, design and workforce.<sup>38</sup>
45. A full business case for Phase One, with an updated cost estimate, was expected to be published by the Government in June 2019 alongside an

35 **Q 18** (Nusrat Ghani MP)

36 Prices include contingency and rolling stock. The 2015 Spending Review set the budget for Phase 2a at £3.72 billion and Phase 2b at £24.83 billion. The latest Financial Case for Phase Two, published in July 2017, said there had been a £241 million budget transfer from Phase 2a to Phase 2b in relation to a tunnel at Crewe. The Financial Case said this had not resulted in an increase to the overall funding of the project. Department for Transport, ‘High Speed Two Phase Two Financial Case’, July 2017: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/629165/high-speed-two-phase-two-financial-case.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/629165/high-speed-two-phase-two-financial-case.pdf) [accessed 1 May 2019]

37 The Office for National Statistics publishes an index of price increases for construction. This suggests that the price of new construction work for infrastructure rose by 6.7 per cent from 2015 to December 2018. Office for National Statistics, ‘Construction Output Price Indices (OPIs), UK: October to December 2018’, Table 2, 13 February 2019: <https://www.ons.gov.uk/businessindustryandtrade/constructionindustry/bulletins/constructionoutputpriceindicesopis/octobertodecember2018> [accessed 1 May 2019]

38 **Letter to the Chairman from Mark Thurston, Chief Executive Officer of High Speed Two (HS2) Ltd**, 7 March 2019. HS2 Ltd said that the indirect costs included technical designs and safety standards, IT systems, design of Phase One and Phase Two routes, HS2 Ltd workforce, HR, legal and facilities costs, consultation, communication and public engagement activities. The remaining spend was on Hybrid Bill development and delivery (£300 million), enabling works (£144 million), main works (£104 million), utilities (£72 million), ground investigation works (£65 million), network activity (£165 million), VAT provisions (£275 million) and other work on behalf of the Department for Transport (£60 million).

authorisation of notice to proceed with Phase One.<sup>39</sup> The Government however said in April 2019 that this would now “take place later in 2019” to allow HS2 Ltd “to finalise costs and plans with its contracted suppliers.”<sup>40</sup>

*Estimates the project will overspend*

46. There has been speculation that High Speed 2 will overspend its budget. A December 2016 internal report from the Government’s Infrastructure and Projects Authority, leaked to *The Sunday Times* last year, described the project as being in a “precarious position” and that it was “highly likely to significantly overspend, [by around] 20-60% with the likely cost increasing ... to more than £80 bn.”<sup>41</sup>
47. The rail consultant Michael Byng has estimated the total cost of Phase One will come to £48 billion excluding rolling stock (compared to HS2 Ltd’s estimate of £24 billion excluding rolling stock). He priced the scheme using costing methodology introduced by Network Rail in 2014.<sup>42</sup>
48. We asked Sir Terry Morgan, the former chair of HS2 Ltd, about these estimates. He said that “everybody has their own guestimate on this” and he didn’t agree with the December 2016 report. When asked for his own estimate, he replied that “nobody knows yet”.<sup>43</sup>
49. Mark Thurston, the chief executive of HS2 Ltd, told the Committee that it was “important to keep in mind that HS2 is the largest and most complex infrastructure project undertaken in modern British history.” He said they were working with their supply chain to reduce costs: “we are challenging the supply chain to innovate, to work collaboratively and to draw on the experience of some of the world’s leading infrastructure companies working with us.”<sup>44</sup>

**Project appraisal of High Speed 2**

50. This section considers the Government’s appraisal of the High Speed 2 project and updates the analysis in our 2015 report on the assumptions used in the appraisal process.

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39 HL Deb, 24 July 2018, [col 1593](#). Baroness Sugg, Parliamentary Under Secretary of State for Transport, said the cost estimate “will be informed by supplier feedback where contracts have been awarded and will reflect expenditure to date and projected income and maintenance costs. Where contracts have not yet been awarded (e.g. railway systems, rolling stock) HS2 Ltd estimates will be used.”

40 Written Answer from Baroness Sugg, 12 April 2019, Grouped Questions [HL14997](#), [HL14998](#), [HL14999](#), [HL 15000](#).

41 A. Gilligan, ‘HS2 budget ‘will balloon to £80bn’, says secret report’, *Sunday Times*, 22 July 2018: <https://www.thetimes.co.uk/article/hs2-budget-will-balloon-to-80bn-says-secret-report-r9qtwpbpl> [accessed 1 May 2019]

42 Tony Berkeley, @tonyberkeley1, 17 March 2018: [https://twitter.com/tonyberkeley1/status/974946514379386880?ref\\_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E974946514379386880&ref\\_url=https%3A%2F%2Fwww.transport-network.co.uk%2FLabour-peer-suggests-HS2-costs-double-what-public-is-told%2F14910](https://twitter.com/tonyberkeley1/status/974946514379386880?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E974946514379386880&ref_url=https%3A%2F%2Fwww.transport-network.co.uk%2FLabour-peer-suggests-HS2-costs-double-what-public-is-told%2F14910) [accessed 1 May 2019]

43 [Q 5](#) (Sir Terry Morgan). Sir Terry Morgan was the chair of HS2 Ltd from August 2018 to December 2018.

44 [Letter to the Chairman from Mark Thurston, Chief Executive Officer of High Speed Two \(HS2\) Ltd](#), 7 March 2019. In an interview with BBC Look North in February 2019, Mr Thurston said “We’ve always said we will know what it costs to build HS2 once we’ve got all our contractors mobilised, all our supply team mobilised. This is a huge economic project for the country.” Steve Bird and Edward Malnick, ‘True cost of HS2 not known, boss of controversial rail scheme admits’, *Sunday Telegraph*, 16 February 2019: <https://www.telegraph.co.uk/politics/2019/02/16/true-cost-hs2-not-known-boss-controversial-rail-scheme-admits/> [accessed 1 May 2019]

### Latest cost-benefit analysis

51. The Department for Transport requires a cost-benefit analysis of all transport projects requiring Government approval. Its guidance on cost-benefit analysis explains why:  
  

“The purpose of transport appraisal is to estimate the welfare impacts of transport investment to satisfy the accounting officer responsibilities that public expenditure represents value for money; this is in accordance with the requirements of the Treasury’s Green Book.”<sup>45</sup>
52. There are two main categories of benefits that are assessed for transport projects:
  - Transport user benefits: the benefit which travellers enjoy as a result of a project, for example due to reductions in travel time or travel cost.
  - Wider economic benefits: these include an estimate of benefits not captured by the transport user benefits such as productivity gains through agglomeration, arising from the fact that businesses and workers are brought closer together through quicker travel times, and the benefits that arise as businesses and households relocate as a result of the project.
53. The results of the latest cost-benefit analysis for High Speed 2, published in July 2017, are in Table 7.

**Table 7: Estimate benefits, revenues and costs of the full High Speed 2 network (2015 prices)<sup>46</sup>**

Net transport benefits	£74.6 billion
Wider economic benefits	£17.6 billion
<b>Net benefits</b>	<b>£92.2 billion</b>
Capital costs	£55.8 billion
Operating costs	£27.6 billion
Revenues	£43.6 billion
<b>Net costs to Government</b>	<b>£39.8 billion</b>
<b>Benefit cost ratio with wider economic benefits</b>	<b>2.3</b>

Source: Department for Transport, ‘High Speed Two Phase Two Economic Case’, July 2017, p 13: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/634196/high-speed-two-phase-two-economic-case.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/634196/high-speed-two-phase-two-economic-case.pdf) [accessed 1 May 2019]

<sup>45</sup> Department for Transport, ‘TAG UNIT A2.1: Wider Economic Impacts Appraisal’, May 2018, p 2: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/712878/tag-unit-a2-1-wider-impacts-overview-document.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/712878/tag-unit-a2-1-wider-impacts-overview-document.pdf) [accessed 1 May 2019]

<sup>46</sup> The figures in the table cover the 60 year appraisal period which is up to 2093 for the full network.

*Appropriateness of cost-benefit analysis for assessing large infrastructure projects*

54. The Department's guidance on cost-benefit analysis says that the economic impacts of transport projects are "primarily captured by the estimation of [transport] user benefits."<sup>47</sup> For projects that reduce journey times, such as High Speed 2, transport user benefits are calculated by estimating the amount of time saved by travellers who will use the new railway, and applying a monetary value of time depending on the type of traveller (for example, a person travelling for leisure has their time valued at £6.04 an hour, see Table 8 below).
55. In an ideal scenario, according to the Department, "[transport] user benefits will capture the entire welfare effects of a transport investment." But additional benefits—the wider economic benefits—can also arise:
- "Wider economic impacts refers to economic impacts which are additional to transport user benefits. They arise because market failures in secondary markets (non-transport markets), such as the labour and land markets, mean that the full welfare impact of a transport investment may not be reflected in the transport market."<sup>48</sup>
56. These 'market failures' mean provision is made in the assessment to estimate the wider economic impacts, such as the productivity gains that result from businesses and workers being closer together.

*Limitations of Department for Transport's method of appraisal*

57. The Department's method for analysing the wider economic impacts of a project is limited however as it does not allow land use to vary as a result of new transport infrastructure: for example, if a new railway released capacity for more peak time trains to serve a town, the appraisal of the benefits would not take into account that more houses may be built in that town as a result of the greater capacity to serve commuters.
58. Nick Bisson, Director of HS2 Phase Two at the Department for Transport, acknowledged these limitations. He characterised the benefits of transport projects in three levels:
- "The first and most established one is merely the benefits to transport users ... The second attempts to quantify the wider economic impacts ... but based on fixed land use ... and trend-based growth in employment and population ...
- ... The third level, which is the most difficult to do, technically and analytically, allows that land use to vary ... this allows the growth in employment and population to vary as a consequence of the scheme."
59. The third level of benefits—which capture more fully the transformative effect new infrastructure can have—are not taken account of in the existing appraisal. Mr Bisson said "so far, we have not produced a robust quantification

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47 Department for Transport, 'TAG UNIT A2.1: Wider Economic Impacts Appraisal', May 2018: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/712878/tag-unit-a2-1-wider-impacts-overview-document.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/712878/tag-unit-a2-1-wider-impacts-overview-document.pdf) [accessed 1 May 2019]

48 Department for Transport, 'TAG UNIT A2.1: Wider Economic Impacts Appraisal', May 2018: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/712878/tag-unit-a2-1-wider-impacts-overview-document.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/712878/tag-unit-a2-1-wider-impacts-overview-document.pdf) [accessed 1 May 2019]

of that third level for HS2.”<sup>49</sup> We know from history however that transport infrastructure, in particular railways, can bring about profound change in land use, for example the new houses built alongside the expansion of the Metropolitan Railway into Buckinghamshire in the early 20th century.<sup>50</sup>

60. Bridget Rosewell told the Committee that assessing the project on the basis of transport user benefits was “looking at it from the wrong way up” and questioned how appropriate it was for large transport investments:

“It has grown out of a historic view of why we undertake transport investments, which was not really about large-scale investment, and which was based on the assumption that everything else was unchanged—the economy and the transport system were therefore independent of one another, which was a fundamental assumption of the modelling approaches.”

61. She said the Department’s analysis provided “a poor measure of benefits” for High Speed 2, “the business case is built on the proposition that people save time and that time is valuable to them, that is not the right way we should think about the benefits of large investments.”<sup>51</sup> She said the Department for Transport was now moving away from this, putting together cases that look first at some of those economic opportunities, “but it takes quite a long while for the modelling people to catch up.”<sup>52</sup>
62. **We have serious reservations about the cost-benefit analysis used in determining whether High Speed 2 provides value for money. Cost-benefit analysis is an important discipline for comparing the merits of different projects. But it has serious limitations as a technique for examining the transformational benefits that new infrastructure can provide.**
63. The limited appraisal method leads to the distribution of benefits in Table 5: 81 per cent of the estimated benefits of High Speed 2 are derived from the time savings (the transport user benefits) made by users of the railway. This makes the cost-benefit analysis very sensitive to the monetary value placed on travellers’ time and the estimated demand for the new railway. As our 2015 report concluded, the reliability of cost-benefit analysis “depends upon the quality of the evidence used in the analysis.”<sup>53</sup> We re-examine that evidence below.

#### *Value of travel time savings*

64. Our 2015 report was critical of the evidence behind the values allocated to travellers’ time. In the 2013 economic case (the most recent analysis of the project’s benefits at the time of the Committee’s previous inquiry) the value of business travellers’ time savings did not take account of the fact that time on a train can be used productively and the value of non-travel time savings was criticised for being based on surveys of motorists from 1994.<sup>54</sup>

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49 [Q 27](#) (Nick Bisson)

50 Andrew Martin, *Underground, Overground*, (London: Profile Books Ltd, 2013) p 169: “On what John Betjeman called ‘these mild home county acres’ the Metropolitan would create Metroland, a series of Tudorbethan havens for the office toilers of London”.

51 [Q 37](#) (Bridget Rosewell)

52 [Q 48](#) (Bridget Rosewell)

53 Economic Affairs Committee, *The Economics of High Speed 2*, p 104

54 Economic Affairs Committee, *The Economics of High Speed 2*, Chapter 8



65. These values, and the methods by which they are arrived at, have since been updated. Table 8 compares the value allocated to travel time savings in the 2013 economic case with the most recent economic case in 2017.

**Table 8: Comparison of values allocated to travel time savings for business (by journey distance), commuter and leisure passengers (£ per hour, 2010/11 prices)**

Travel purpose and journey length		2013 economic case	2017 economic case
Business	0-50km	£31.96	£10.02
	50-75km		£14.43
	75-100km		£18.41
	100-125km		£22.63
	125-150km		£26.77
	150-175km		£30.56
	175-200km		£33.80
	200-225km		£36.40
	225-250km		£38.40
	250-275km		£39.89
	275km+		£40.96
Commuting		£6.81	£9.95
Leisure		£6.04	£4.54

Source: High Speed 2 Ltd, 'PLANET Framework Model: PFMv7.1 Assumptions Report', 2017, p 19: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/699029/CS866\\_D\\_Assumptions\\_Report\\_PFM\\_7.1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/699029/CS866_D_Assumptions_Report_PFM_7.1.pdf) [accessed 1 May 2019]

66. The main difference for the purposes of appraising High Speed 2 is that the value allocated to business time travel now varies depending on the length of the journey. HS2 Ltd said that new evidence published by the Department suggested that “the value of business time savings increases for longer trips.”<sup>55</sup>

#### *Business travel time savings*

67. Before 2016 travel time savings for business travellers were determined by the ‘cost saving approach’. This approach assumed business travel time savings were equivalent to the average hourly incomes of travellers, “on the grounds that unproductive travel time when saved can be converted into productive time which has a value equal to the wage rate.”<sup>56</sup> This approach

55 High Speed 2 Limited, 'HS2 Phase Two Summary of key changes to the Economic Case 2015 to 2016', November 2016, p 15: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/574742/Summary\\_of\\_key\\_changes\\_to\\_the\\_Economic\\_Case.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/574742/Summary_of_key_changes_to_the_Economic_Case.pdf) [accessed 1 May 2019]

56 Institute for Transport Studies, Valuation of Travel Time Savings for Business Travellers, April 2013, p 15: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/251997/yttts\\_for\\_business\\_main\\_report-dft-005.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/251997/yttts_for_business_main_report-dft-005.pdf). The approach calculates the value of business travel time by adding the gross wage to non-wage labour costs. The gross wage rate was calculated for rail passengers using evidence from the National Travel Survey. A percentage increase was then applied to reflect non-wage labour costs such as national insurance and pensions contributions. Economic Affairs Committee, *The Economics of High Speed 2*, p 108

was criticised by witnesses during our 2015 inquiry because it did not take into account that people can work during a train journey.<sup>57</sup>

68. The new values of time for business travellers are based on ‘willingness to pay’ where surveys indicate how much business travellers are prepared to pay for a shorter journey. The Department introduced this approach in an October 2015 report.<sup>58</sup> This method was already used for calculating the value of commuting and leisure time.<sup>59</sup>
69. The values in Table 8 above are derived from surveys of travellers carried out in 2014.<sup>60</sup> Business travellers were presented with a number of scenarios where they had to choose between two options. One option was a slower but cheaper journey than the other.<sup>61</sup> Business travellers were told that for each pair of options, they should bear in mind their company’s travel policy.<sup>62</sup>
70. Responses from the surveys were combined with data from the National Travel Survey to produce “nationally representative values” for use in transport appraisal.<sup>63</sup>
71. **We do not believe that asking business rail travellers hypothetical questions—about how much they would be willing to pay for quicker journeys—is the most robust evidence base on which to base a calculation of the benefits that a £55.7 billion new railway will bring.**

*Increasing the value of travel time savings for business by distance*

72. The number of business travellers surveyed in the research who were travelling more than 50 miles is shown in Table 9 and compared with the data from the National Travel Survey.

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57 Economic Affairs Committee, *The Economics of High Speed 2*, p 108

58 Department for Transport, ‘Understanding and Valuing Impacts of Transport Investment: Values of travel time savings’, October 2015: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470998/Understanding\\_and\\_Valuing\\_Impacts\\_of\\_Transport\\_Investment.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470998/Understanding_and_Valuing_Impacts_of_Transport_Investment.pdf) [accessed 1 May 2019].

59 Commuting is counted as non-work travel for the purposes of transport cost-benefit analysis. Economic Affairs Committee, *The Economics of High Speed 2*, p 107

60 Arup, ‘Provision of market research for value of travel time savings and reliability’, 14 August 2015: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470231/vtts-phase-2-report-issue-august-2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470231/vtts-phase-2-report-issue-august-2015.pdf) [accessed 1 May 2019]. The research was carried out by a consortium of Arup, the Institute for Transport Studies and Accent. The surveys also included scenarios that determined what people were willing to pay to avoid crowded and unreliable rail services. But for the values of time in Table 8, the results of the exercise described in paragraph 68 were used.

61 Accent, ‘Appendix E: Pilot Intercept Recruitment Questionnaire’, August 2015, page 82: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470234/appendix-e-final-14-august-2015-questionnaires.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470234/appendix-e-final-14-august-2015-questionnaires.pdf) [accessed 1 May 2019].

62 The Arup report acknowledged that this presented issues: “There continues to be a debate as to whether [stated preference] can elicit credible valuations of travel time savings and reliability. This challenge is especially vocal in the area of business travel, given that respondents might not act as agents for their employer’s best interests.” If an employee had said that their employer would not be interested in paying to save time, they were told to answer as if they were paying for the journey themselves. Arup, ‘Provision of market research for value of travel time savings and reliability’.

63 Department for Transport, ‘Understanding and Valuing Impacts of Transport Investment: Values of travel time savings’. The Department’s report describes how the results of the surveys were turned into values of time: “Results from the choice models allow estimation of a value of time for a given mode, journey purpose, trip distance, traveller income etc [but] the survey sample was not constructed to be nationally representative ... Therefore, the study team also developed an ‘Implementation Tool’, which applied results from the choice modelling to trips recorded in the National Travel Survey (NTS). Using NTS data from 2010 to 2012, this essentially estimated a value of time for each NTS trip, which could then be averaged to produce nationally representative values for use in transport appraisal.”

**Table 9: Number of surveys carried out for rail passengers travelling more than 100 miles, stated preference survey versus National Travel Survey**

	Stated preference surveys	National Travel Survey
100 to 150 miles	311	142
150+ miles	291	126

Source: Arup, 'Provision of market research for value of travel time savings and reliability, Phase 2 Report, 14 August 2015, page 79: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470234/appendix-e-final-14-august-2015-questionnaires.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470234/appendix-e-final-14-august-2015-questionnaires.pdf) [accessed 1 May 2019]

73. The higher values of time for the six travel bands above 150 miles, as shown in Table 8 above, are based on 291 responses from the stated preference surveys and 126 responses from the National Travel Survey. This is the evidence base for a large proportion of the estimated £55 billion of benefits (60 per cent of the project's total estimated benefits) that the project will provide for business travellers. The Department said that the number of rail trips in the National Travel Survey dataset was "sufficient for robust calculation of average values."<sup>64</sup>
74. **We are concerned particularly that the time saved by long-distance rail business travellers has increased in value for the purposes of appraisal since our 2015 report, on the strength seemingly of a few hundred interviews carried out on station platforms.**

*Using business travel time productively*

75. The 'willingness to pay' method in theory allows for the fact that a person can use travel time productively, as survey respondents were expected to factor this into their decision-making when deciding how much they were willing to pay for faster journeys. The stated preference surveys also collected data on how business travellers used their time on rail journeys, which are summarised in Box 2.
76. The Department's October 2015 report said that the data showed "two key results":

"while travel time is not 'dead time', it is not necessarily used as productively as other 'work time', with the sentiment that "quicker journeys are always more desirable."

"How business travellers used their travel time was not found to have a significant impact on the value of time in the choice modelling. The result that the values of time did not vary with time use does not necessarily mean that time use is not important - the values of time estimated in this study are representative of current travelling conditions and uses of travel time. The results could have been different if the opportunities to use travel time productively were significantly different."<sup>65</sup>

64 *Ibid.* The Department said there were "several reasons" why values of time for business travel could be expected to increase with distance. Longer trips "tend to be more costly ... are more likely to involve travel outside of normal working hours ... and while it is possible to work while travelling, [the] qualitative research highlighted the limitations on the sorts of tasks that can be completed during a journey."

65 *Ibid.*



## Box 2: Activities undertaken by business travellers during rail journeys

Arup's August 2015 report explained how data was collected on how business travellers used their time during rail journeys, and how to interpret the results

"Employees were reminded of their reported one way trip time and asked approximately how much of that time they spend undertaking work and non-work related activities ... these findings should be contextualised against the average travel times."

The average travel time in the survey for business rail travel was 1 hour 58 minutes.

**Table 10: Activities undertaken by business travellers during trip  
(average minutes spent on each activity)**

Activity		Average duration
Work related activities	Use laptop / tablet	26 minutes
	Use smartphone/Blackberry/ phone	17 minutes
	Other work related to employment	13 minutes
Non work related activities	Talking on phone	2 minutes
	Using smartphone/eBook/ tablet/computer	16 minutes
	Reading a book/magazine/ newspaper	15 minutes
	Eating/drinking	6 minutes
	Talking to travelling companions/other travellers	9 minutes
	Listening to music	14 minutes
	Planning things	4 minutes
	Doing nothing/relaxing/ looking out of window	22 minutes
	Other	3 minutes

The report concluded "it is clear that a large proportion of rail travel time is spent on non-work activities."

Source: Arup, 'Provision of market research for value of travel time savings and reliability', 14 August 2015: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470231/vtts-phase-2-report-issue-august-2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470231/vtts-phase-2-report-issue-august-2015.pdf) [accessed 1 May 2019].

### *Non-work travel time savings*

77. The latest research also updated the values of travel time savings to apply to commuting and leisure journeys (the 2013 economic case had relied on surveys of motorists from 1994 to calculate these values).<sup>66</sup> The latest values, shown in Table 6, are based on surveys of commuter and leisure travellers from the same study, with travellers asked to pick between two options for different trips as described above.

78. The value of time for these journeys does not however differ by journey time. The Government said that “further analysis of the data is required to support possible further segmentation of the non-work values, for example by distance.”<sup>67</sup>

*Audit of latest research*

79. The new research was audited by Systra in 2015. Systra disagreed that the ‘willingness to pay’ approach was preferable to the ‘cost saving’ approach: “On the evidence provided, we would, perhaps, have drawn a different conclusion—which is that the issue is currently undecided. We do not think that the evidence presented here is strong enough to draw clear conclusions.”<sup>68</sup>
80. **We welcome attempts to update the evidence for travel time savings. But the new values are based on unconvincing data. We note that 60 per cent of the estimated benefits of High Speed 2 (£55 billion) relate to business travel.**

*Demand forecasts*

81. The other main factor that influences the size of the estimated benefits of the project is the expected demand for long distance travel and given the higher value of time for business travellers, the proportion of that demand who will be travelling for business. This section examines the latest forecasts for demand growth and compares them with recent trends.

*Forecasting demand for long-distance rail*

82. Our 2015 report concluded:
- “Partial information on current railway usage, as well as uncertainty about future technological developments in automotive transport and working habits, makes it difficult to assess the plausibility of the Department’s forecasts of future demand for long-distance rail travel.”<sup>69</sup>
83. Nick Bisson from the Department for Transport said the modelling assumes an average annual growth rate in demand for long distance rail of “only” 1.9 per cent, “an argument could be made that that is conservative”:
- “Since privatisation, the rail network as a whole has seen annual average growth of 3.9 per cent. On long-distance services, that has been 4.6 per cent. In the last five years, although the long-distance annual average growth has been 2.5 per cent, on the west coast main line it remained at 4.7 per cent. We have continued to see strong growth on the core markets that HS2 will serve.”<sup>70</sup>

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67 Department for Transport, ‘Understanding and Valuing Impacts of Transport Investment: Values of travel time savings’, October 2015: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470998/Understanding\\_and\\_Valuing\\_Impacts\\_of\\_Transport\\_Investment.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470998/Understanding_and_Valuing_Impacts_of_Transport_Investment.pdf) [Accessed 10 May 2019]

68 They concluded: “Nevertheless, this study has progressed our understanding of travellers’ values of time savings and we recommend that the DfT undertakes more frequent smaller-scale updating exercises in future.” Systra, ‘Value of Travel Time Savings - Peer Review & Audit’, 30 July 2015: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470256/vtts-peer-review-final-report-v3.0.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470256/vtts-peer-review-final-report-v3.0.pdf) [Accessed 1 May 2019]

69 Economic Affairs Committee, *The Economics of High Speed 2*, p 36

70 [Q 24](#) (Nick Bisson)

84. The Government argued similarly in our 2015 inquiry that the 2.2 per cent average annual growth in long-distance rail travel that the modelling assumed at the time, was “a very conservative estimate.”<sup>71</sup>
85. Growth in long-distance rail demand has varied in the last few years. Office for Rail and Road statistics show that long-distance rail journeys across Great Britain grew by 3.1 per cent in 2015/16, 3.8 per cent in 2016/17 and 0.9 per cent in 2017/18.<sup>72</sup>
86. Journeys between central London and the West Midlands increased by 6.2 per cent in 2016/17 compared with the previous year, but increased by 2.2 per cent between 2016/17 and 2017/18; journeys between London and the North West increased by 5.1 per cent in 2016/17 compared with the previous year, but decreased slightly between 2016/17 and 2017/18.<sup>73</sup>

*Sensitivity of cost-benefit analysis to demand growth*

87. The sensitivity of the project’s appraisal to demand was shown by the reduction in benefits caused by a reduction in forecast GDP growth between the 2016 and 2017 business cases.<sup>74</sup>
88. The 2016 model had assumed GDP per head annual growth of 1.5 per cent from 2014/15 to 2026/27, and 1.8 per cent from 2026/27 to 2037/38. The 2017 model assumed GDP per head annual growth of 1.25 per cent from 2016/17 to 2026/27, and 1.7 per cent from 2026/27 to 2037/38.<sup>75</sup>
89. The reduction in predicted demand reduced the estimated transport user benefits by almost £10 billion. Given GDP per head growth forecasts have been lowered again since 2017, the next business case for High Speed 2 may contain further reductions to estimated demand growth.<sup>76</sup>

*Reliability of long-distance rail statistics*

90. As mentioned in our 2015 report, we note that the rail usage statistics do not distinguish between local and long-distance journeys. For example, as Virgin Trains are classified as an operator in the long-distance sector, all journeys

71 Economic Affairs Committee, *The Economics of High Speed 2* p 30

72 Office of Rail and Road, ‘Passenger journeys by sector - Table 12.6’: <http://dataportal.orr.gov.uk/displayreport/report/html/a10e3c7b-7766-40ae-a87a-14c56cf85a63> [accessed 1 May 2019]

73 Office of Rail and Road, ‘Regional Rail Usage - Table 15.4’: <https://dataportal.orr.gov.uk/browse/reports/15> [accessed 1 May 2019]

74 High Speed 2 Ltd, ‘High Speed Two (HS2) Phase Two PFM v7.1 Step-through report: Summary of key changes to modelling assumptions between PFM v6.1c and PFM v7.1’, July 2017: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/628528/CS866\\_C\\_PFMv7.1\\_Step-Through\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/628528/CS866_C_PFMv7.1_Step-Through_Report.pdf) [accessed 1 May 2019]

75 High Speed 2 Limited, ‘PLANET Framework Model: PFMv7.1 Assumptions Report’, July 2017: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/699029/CS866\\_D\\_Assumptions\\_Report\\_PFM\\_7.1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/699029/CS866_D_Assumptions_Report_PFM_7.1.pdf); High Speed 2 Limited, ‘HS2 Phase Two Assumptions Report: PLANET Framework Model version 6.1c’, November 2016: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/574740/Planet\\_Framework\\_Model\\_Assumptions\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/574740/Planet_Framework_Model_Assumptions_Report.pdf) [Accessed 1 May 2019]

76 The reduction in benefits caused by the lower demand growth meant the overall cost-benefit ratio of the project was reduced to 2.0 from 2.6 in the 2016 analysis. However, following an update from the Department for Transport to its appraisal guidance, the cap on demand growth in the HS2 modelling was removed, allowing the number of journeys on the railway to increase with predicted population growth up to the end of the appraisal period in 2033. Previously, demand for the railway had been capped in 2037. The change increased the expected benefits by around 8 per cent and resulted in the cost-benefit ratio increasing from 2.0 to 2.3. Department for Transport, ‘High Speed Two Phase Two Economic Case’, July 2017, Annex C: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/634196/high-speed-two-phase-two-economic-case.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/634196/high-speed-two-phase-two-economic-case.pdf)

on their services are captured in the official statistics for long-distance rail travel, regardless of length.<sup>77</sup>

91. The Minister provided us with figures which show that 15 per cent of journeys on Virgin Trains services between London and Manchester in 2018 were shorter distance trips.<sup>78</sup> Without comparable figures for earlier years, it is not possible to determine whether demand growth in between London and Manchester is driven by an increase in long-distance or shorter-distance journeys.
92. **The Government maintain the demand forecasts for long-distance rail are “conservative”. But for some of the routes which the modelling for High Speed 2 anticipates will provide the most benefits, this is not borne out by the observed demand growth in recent years.**
93. **The forecast benefits of the project are very sensitive to the levels of demand predicted by HS2 Ltd’s model materialising: a revision to forecasts GDP per head growth in the latest business case caused the estimated benefits of the project to fall by £10 billion. We note HS2 Ltd’s analysis does not factor in the effect on business travel that developments in communications technology may have.**

*Forecasting the proportion of business travellers - 2015 inquiry*

94. Our 2015 report criticised HS2 Ltd for the large proportion of travellers it estimated were travelling for business. The Government told us that the High Speed 2 modelling assumed that in 2010, the then base year for the model, 39 per cent of long-distance trips over 100 miles were for business, 46 per cent for leisure and 15 per cent for commuting.<sup>79</sup>
95. Table 11 compares the proportion of business travellers travelling between the main cities on High Speed 2 that was assumed in the August 2012 economic case with the October 2013 economic case.

**Table 11: Weekday journey purpose proportions on main High Speed 2 routes used in modelling, August 2012 economic case versus October 2013 economic case (base year 2010)<sup>80</sup>**

	August 2012 economic case		
	Business	Leisure	Commuting
<b>London and Birmingham</b>	26%	49%	26%
<b>London and Leeds</b>	28%	56%	16%
<b>London and Manchester</b>	24%	54%	22%
<b>London and Sheffield</b>	23%	49%	28%

<sup>77</sup> Economic Affairs Committee, *The Economics of High Speed 2*, p 53

<sup>78</sup> [Letter for Nusrat Ghani MP to the Chairman](#), 18 March 2019

<sup>79</sup> Economic Affairs Committee, *The Economics of High Speed 2*, p 114

<sup>80</sup> These figures were considered in our 2015 report from paragraph 403. *Ibid.*

	October 2013 economic case		
	Business	Leisure	Commuting
<b>London and Birmingham</b>	56%	29%	15%
<b>London and Leeds</b>	56%	40%	4%
<b>London and Manchester</b>	64%	31%	5%
<b>London and Sheffield</b>	65%	31%	5%

Source: Atkins, *High Speed Two Atkins Model Development Report - PFMv3.0-PFMv4.3*, 25 September 2014, Table 2-23: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/640685/Atkins\\_Model\\_Development\\_Report\\_PFMv3.0-PFMv4.3.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/640685/Atkins_Model_Development_Report_PFMv3.0-PFMv4.3.pdf) [Accessed 1 May 2019]

96. The Department for Transport explained the reasons for the change in methodology to the 2015 inquiry:

“Prior to the October 2013 HS2 Economic Case the journey purpose of trips was determined by using ticket sales data to examine the type of ticket sold (full price, open etc.) and making assumptions about the relationship between the ticket type and the journey’s purpose. This approach had the following limitations:

- The relationship between ticket type and journey purpose was based on national averages and did not vary according to distance or region; and,
- Analysis of the National Passenger Survey data shows that more business trips are now being undertaken using reduced or advanced purchase tickets and this was not reflected in the data and assumptions used.”<sup>81</sup>

97. To reflect these limitations, the department revised their approach by directly sourcing journey purpose splits from the National Rail Travel Survey. This was a large survey of rail passengers (sample size 436,000) undertaken in London areas in 2001 and other areas of the country between 2004 and 2005.

98. Our 2015 report criticised the department for using this old survey data: “The substantial increase in forecast business travel in the latest economic case [compared to the 2012 economic case] is questionable: the supporting evidence was based on survey data that is over ten years old.”<sup>82</sup>

*Forecasting the proportion of business travellers - comparison with latest National Travel Survey data*

99. There have been three further updates to the modelling since the October 2013 economic case. None of the documents associated with those updates have published an update to the journey purpose figures in Table 11. We therefore assume the journey purpose proportions in the latest modelling remain similar to the 2013 economic case.

81 Written evidence from the Department for Transport to the Committee’s 2015 inquiry, *The Economics of High Speed 2* (EHS0090)

82 Economic Affairs Committee, *The Economics of High Speed 2*, p 118

100. We asked the Minister for updated statistics on long-distance rail journeys by purpose. She provided the figures in Table 12 for the journey purpose split for journeys over 50 miles from the National Travel Survey.

**Table 12: Weekday long distance rail journeys by route and purpose, National Travel Survey data, 2002 to 2017 average**

Route (both directions)	Purpose		
	Business	Leisure	Commuting
London - West Midlands	42%	40%	17%
London - North West	42%	52%	6%
All long distance rail travel (over 50 miles)	26%	44%	30%

Source: [Letter from Nusrat Ghani MP to the Chairman](#), 25 February 2019

101. During our 2015 inquiry, the equivalent figures for 2002 to 2013 were cited by the then Secretary of State for Transport in support of the modelling assumptions about journey purpose in Table 11.
102. We asked the Minister if the 2002 to 2017 figures could be broken down into shorter time periods. The Minister said however that the sample sizes were too small:

“the number of reported trips in the National Travel Survey is very small and these trips are being reported by a very small sample of respondents (in some cases fewer than 20 people across the five years in total) ... This makes any meaningful comparison across the time periods very difficult ... the data would not add clarity on changes in the purpose of weekday long distance rail travel on these routes.”

103. But the Minister did provide a breakdown of journey purpose for all long distance rail, below in Table 13, which shows the proportion of business travel has decreased over the period 2002 to 2017.

**Table 13: Weekday long-distance rail trips (over 50 miles) by journey purpose, National Travel Survey data for 2003–2007, 2008–2012 and 2013–2017**

Trip Purpose	Time period		
	2003–2007	2008–2012	2012–2017
Business	29%	25%	25%
Commuting	26%	29%	33%
Leisure	45%	45%	41%

Source: [Letter from Nusrat Ghani MP to the Chairman](#), 18 March 2019

104. The Minister’s suggestion that the sample size would be too small to make meaningful comparisons across a smaller period calls into question how



reliable the data in Table 12 is. Nevertheless, that data, and the data for all long-distance rail travel in Table 13, suggest that HS2 Ltd's estimate for business travel on High Speed 2 is too high.

*Forecasting the proportion of business travellers - comparison with latest National Passenger Survey*

105. The latest modelling of journey purposes remains based on the National Rail Travel Survey. We note the survey data is almost 15 years old and the data for London is nearly 20 years old. The latest modelling report from HS2 Ltd says that "analysis of the National Passenger Survey data suggested that the profile of travellers by purpose had remained fairly stable over the period 2004–2011."
106. The latest National Passenger Survey for Virgin Trains services on the West Coast Main Line, from a weighted sample of 35,698 journeys, showed that 23 per cent of trips were for business purposes, 66 per cent for leisure and 11 per cent for commuting.<sup>83</sup>
107. **The estimated benefits of High Speed 2 are highly dependent on the forecast numbers of business travellers on long-distance rail. The evidence upon which the number of business travellers used in HS2 Ltd's modelling is based is now around 15 to 20 years old. It does not appear to correspond to the proportion of journeys undertaken for business that the most recent data from the National Travel Survey and the National Passenger Survey show.**
108. **The sensitivities of the estimated benefits of High Speed 2 to values of time and demand forecasts demonstrate how important it is to the business case that the new railway is designed to be as fast as possible.**
109. *New analysis of the project is needed which takes account of the transformative effects, including allowing for changes in land use, that new infrastructure can have. The assumptions behind values of travel time and the demand forecasts should be revised ahead of this new analysis. This analysis should be published alongside the full business case by the end of 2019.*

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83 Virgin Trains, National Rail Passenger Survey, June 2018 [https://www.virgintrains.co.uk/-/media/vt/files/pdf/national\\_rail\\_passenger\\_survey/national-passenger-survey-18-spring.ashx?la=en&hash=39CA6883C54D928809DD6F9D5CA21D7FE05DF5D9](https://www.virgintrains.co.uk/-/media/vt/files/pdf/national_rail_passenger_survey/national-passenger-survey-18-spring.ashx?la=en&hash=39CA6883C54D928809DD6F9D5CA21D7FE05DF5D9) [accessed 1 May 2019]

## CHAPTER 4: REDUCING THE COST OF HIGH SPEED 2

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110. The Committee's follow-up work focused on two ideas which the 2015 report had recommended the Government should consider further: designing the railway to run at a lower speed and a London terminus at Old Oak Common rather than Euston.
111. The Government's response to the 2015 report did not address either recommendation. The then Chairman of the Committee wrote to the Secretary of State for Transport in July 2015 to pursue these recommendations.<sup>84</sup> In his reply, the Secretary of State said that the Government's position was "well established ... our analysis has shown that the reduction in benefits from changes to scheme design such as terminating at Old Oak Common or lowering speed would outweigh any cost savings."<sup>85</sup> We examine the two ideas again below.

### Lower speed

112. High Speed 2 is being built to accommodate trains travelling at a maximum speed of 400 kilometres per hour, with trains expected initially to run at a maximum of 360 kilometres per hour. This compares to a maximum speed of 300 kilometres per hour on High Speed 1, and 320 kilometres per hour on the Train à Grande Vitesse (TGV) high speed train in France.<sup>86</sup>
113. Our 2015 report recommended:
- "The Government should review opportunities to reduce the cost of constructing HS2 through a change in the design of the scheme to one with a lower maximum speed—such as that used on continental railways—and publish the results of this exercise. This should include an assessment of the effect a lower speed would have on journey times, which is likely to be small."<sup>87</sup>
114. Nusrat Ghani MP, the Minister for HS2, told the Committee that "Government requirements remain that HS2 should remain designed to a maximum speed of 360km/h, with its route alignment enabling speeds up to 400km/h in the future."<sup>88</sup>

### Questioning of the design speed

115. Sir Terry Morgan said the HS2 team "have the challenge of what I would describe as cost, time and, not least, scope."<sup>89</sup> But that "inside the project team, the determination is that the scope, as specified by government, is still being worked to."<sup>90</sup> When asked whether HS2 Ltd could say a lower speed was necessary to build the project to budget, he replied:

"This is always dangerous territory. Something has to give in the triangle of scope, cost and time ... I think people will have to flex on the whole

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84 [Letter from the former Chairman to the Secretary of State for Transport](#), 21 July 2015

85 [Letter from Secretary of State for Transport to the former Chairman](#), 1 September 2015

86 Economic Affairs Committee, *The Economic Case for High Speed 2* p 23

87 *Ibid.*

88 [Letter from Nusrat Ghani MP to the Chairman](#), 19 February 2019

89 [Q 5](#) (Sir Terry Morgan)

90 [Q 6](#) (Sir Terry Morgan)



question of the value for money statement about whether we need the speed and frequency.”<sup>91</sup>

116. He thought that “most people regret calling it High Speed 2. It is about creating capacity ... Connectivity is a more important case for HS2.”<sup>92</sup>
117. Chris Stokes said that “with its relatively short distances, building something in this country that asserts to be the fastest high speed railway in the world is, frankly, close to ludicrous.” He described the present design as “an engineer’s pipe dream” and said “I see no reason to go faster than French TGVs. I think it is silly.”<sup>93</sup> Bridget Rosewell said that although speed was not irrelevant, “I said at the beginning, back in 2008–09, that I did not see why we were privileging 400 kilometres an hour for the cost that it would imply.”<sup>94</sup>

### *Cost savings from reduced speed on Phase 1*

118. We asked HS2 Ltd what cost saving could be achieved by reducing the speed. Mark Thurston said that they had reviewed reducing operating speeds to 300 kilometres per hour and 200 kilometres per hour for Phase 1:

“HS2 Ltd was remitted ... to explore the optimal trade-off between journey time, maximum speed, and demand for the railway’s services. Part of this work reviewed operating speeds down to 300 km/h. This work concluded that the net present value of the capital expenditure for the project would be reduced by £600m, with greater savings being in the longer term operational costs (£1.25bn) largely due to reduction in energy costs.

However, the reduction in operating speed led to a greater reduction in revenue and benefits of £6 billion and hence a deterioration in the Benefit Cost Ratio (BCR) for the project.

HS2 Ltd also reviewed the Phase One consulted route at 200km/h (The same speed that Pendolinos travel at on the West Coast Main Line currently). The cost would be 9% lower than the cost of the route designed for 360km/h, but the increase in journey time would reduce passenger usage by 19%, leading to a reduction in benefits of 33% and revenue by 24%.”<sup>95</sup>

119. Mr Thurston said that as a result of the assessments, HS2 Ltd had recommended to the department that “the optimum maximum operating speed remained at 360km/h as the practical limit of deliverable technology at the time, noting that with future improvements in technology there is likely to be a case for higher speed.”<sup>96</sup>
120. Table 14 compares the effect of a lower speed on journey times on High Speed 2 between London and Birmingham, and London and Manchester.

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91 [Q 6](#) (Sir Terry Morgan)

92 [Q 7](#) (Sir Terry Morgan)

93 [Q 39](#) (Chris Stokes)

94 [Q 38](#) (Bridget Rosewell)

95 [Letter from Mark Thurston to the Chairman](#), 7 March 2019

96 [Letter from Mark Thurston to the Chairman](#), 7 March 2019

**Table 14: Comparison of journey times between London and Birmingham, and London and Manchester, on High Speed 2 under different maximum speed designs**

Maximum operating speed of High Speed 2	Journey time between London and Birmingham	Journey time between London and Manchester
360 kilometres per hour (present configuration)	49 minutes	67 minutes
300 kilometres per hour	52 minutes	77 minutes
200 kilometres per hour	64 minutes	(no available estimate)
<i>Current journey time (West Coast Main Line)</i>	<i>81 minutes</i>	<i>127 minutes</i>

Source: [Letter from Nusrat Ghani MP to the Chairman](#), 19 February 2019

121. The assessments referred to by Mr Thurston were published by HS2 Ltd in a January 2012 report.<sup>97</sup> In Phase One, trains will operate at 360 kilometres per hour only on a 68 mile section between Amersham and the interchange station near the National Exhibition Centre in Birmingham. The assessment identified six areas on this part of the route where speed reductions could reduce cost. The conclusion was that cost savings would be minimal compared to route refinements which maintain the design speed:

“[cost] reductions are possible, but the small increases in flexibility of route alignment from a lower speed are not are not always sufficient to have a significant reduction in impacts ...

... Any gains that can be achieved through a lower speed are, for the most part, not significantly greater than can be achieved through the changes we have identified ... which maintain the design speed and so maintain benefits whilst allowing for future improvements in journey times.”<sup>98</sup>

122. On a 200 kilometre per hour route, the 2012 report said it “re-examined” earlier work on a conventional speed railway and had carried out a further noise assessment. The earlier work was published in a 2011 economic case for the project which said HS2 Ltd had appraised the case for a conventional speed railway “at a high level: we applied cost and journey time assumptions reflecting conventional speeds to our preferred route for the high speed line.”<sup>99</sup> The 2011 economic case concluded that “upgrading the line to high speed would have a relatively small net cost to Government, but would generate significant benefits (time savings) to passengers on HS2.”<sup>100</sup>

97 Department for Transport, ‘Review of HS2 London to West Midlands Route Selection and Speed’, January 2012: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/3659/hs2-review-of-route-selection-and-speed.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/3659/hs2-review-of-route-selection-and-speed.pdf) [accessed 1 May 2019]

98 *Ibid.*

99 Department for Transport, ‘Economic Case for HS2: They Y Network and London-West Midlands’, February 2011 <https://webarchive.nationalarchives.gov.uk/20110720164411/http://highspeedrail.dft.gov.uk/sites/highspeedrail.dft.gov.uk/files/hs2-economic-case.pdf> [accessed 1 May 2019]

100 *Ibid.*

### Cost savings from reduced speed on Phase 2

123. In 2016 the Department for Transport commissioned Atkins to design and assess “potential strategic, alternative, rail based options to building Phase 2b of High Speed 2.”<sup>101</sup> These alternative schemes “consist of packages of infrastructure upgrades and other interventions.” The alternatives were not designed with the express intention of lowering the maximum design speed and some include parts of Phase 2b as planned.
124. The 2016 Strategic Outline Business Case for Phase 2b rejected all the alternatives on the basis they produce lower benefits than Phase 2b, “this is driven mainly by the smaller reductions in journey times that the alternatives achieve to key northern destinations when compared to using Phase 2b.”
125. Table 15 compares the total cost and journey times provided by Phase 2b against the best alternative as assessed by Atkins.<sup>102</sup>

**Table 15: Comparison of costs and journey times of Phase 2b and best alternative as assessed by Atkins**

	Phase 2b	Best alternative
Total costs (includes capital and operating costs.)	£39.9 billion	£26.6 billion
London to Leeds journey time	75 minutes	95 minutes
London to Manchester journey time	68 minutes	80 minutes
London to Sheffield journey time	69 minutes	83 minutes

Source: Department for Transport, ‘High Speed Two Phase 2b Strategic Outline Business Case: Economic Case’, November 2016: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/570845/hs2-phase-2b-sobc-economic-case.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/570845/hs2-phase-2b-sobc-economic-case.pdf) [accessed 1 May 2019]

126. The analysis indicates that the Government could save £13 billion of the cost of Phase 2b if it was willing to contemplate an extra 10 to 20 minutes additional journey time between northern cities and London.
127. **Our 2015 report recommended that the Government should review the cost saving from lowering the maximum speed of the railway. This work has not been carried out and it is disappointing that the Government’s rejection of the idea remains based on an assessment from 2012.**
128. **We do not see why High Speed 2 is being built to accommodate trains operating at 400 kilometres per hour when the initial maximum operating speed will be 360 kilometres per hour, which itself is faster than the maximum operating speed of any railway in the world. The differences in journey times between a railway operating at 360**

<sup>101</sup> Atkins, ‘Strategic alternative to HS2 Phase 2b’, November 2016 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/568309/strategic-alternatives-to-hs2-phase-2b-atkins-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/568309/strategic-alternatives-to-hs2-phase-2b-atkins-report.pdf) [accessed 1 May 2019]

<sup>102</sup> The alternative selected for the comparison here is Option 3 from the Atkins report.

**kilometres per hour, and one operating at 300 kilometres per hour, are minimal.**

129. **We are concerned that the flawed appraisal method, where the vast majority of the project's benefits are reliant on faster journey times, is behind the Government's unwillingness to reduce the cost of the project by designing a railway to run at a lower speed. An appraisal method that took more account of the transformative effects of new infrastructure would be less sensitive to small changes in journey times.**
130. *For Phase 1, the Government should instruct HS2 Ltd to update and publish its analysis of the cost saving that would be made from designing the line to a lower maximum operating speed.*
131. *For Phase 2b, the 2016 analysis by Atkins suggested substantial cost savings could be achieved by alterations to the route and design of the railway. Further analysis of those options should be carried out and published.*

### **London terminus at Old Oak Common**

132. The present plans for Phase One of High Speed 2 include a station at Old Oak Common in west London, with the London terminus of the line at a redeveloped Euston station. Old Oak Common is a planned station on the Elizabeth Line, the new west-east line across London (the line is being built under the Crossrail programme and an opening date has yet to be announced).<sup>103</sup> The station at Old Oak Common, due to open in 2026, will be in between the Elizabeth Line stations at Acton and Paddington and provide an interchange to High Speed 2.<sup>104</sup>
133. At the time of our 2015 inquiry, there were reports that the estimated cost of the redevelopment of Euston had risen to £7 billion from an initial estimate of £2 billion. The Committee said that a terminus at Old Oak Common would avoid the cost of redeveloping Euston station and of building a tunnel from Old Oak Common to Euston<sup>105</sup>. In light of this we recommended:

“The Government should estimate the overall reduction of cost to HS2 of terminating the line at Old Oak Common... including any necessary redesign of the station at Old Oak Common to make this possible, and calculate the effect on the cost benefit analysis.”<sup>106</sup>

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103 The central section of the Elizabeth Line was due to open in December 2018 but it was announced in August 2018 that this would be delayed to Autumn 2019 as more funding was needed to complete the Crossrail project. But in early 2019 Crossrail admitted it could not commit to an opening date and more work was required to understand how to complete the project. London Assembly Transport Committee, ‘Derailed: Getting Crossrail back on track’, April 2019: [https://www.london.gov.uk/sites/default/files/final\\_-\\_london\\_assembly\\_transport\\_committee\\_crossrail\\_investigation\\_report\\_0.pdf](https://www.london.gov.uk/sites/default/files/final_-_london_assembly_transport_committee_crossrail_investigation_report_0.pdf) [accessed 1 May 2019]

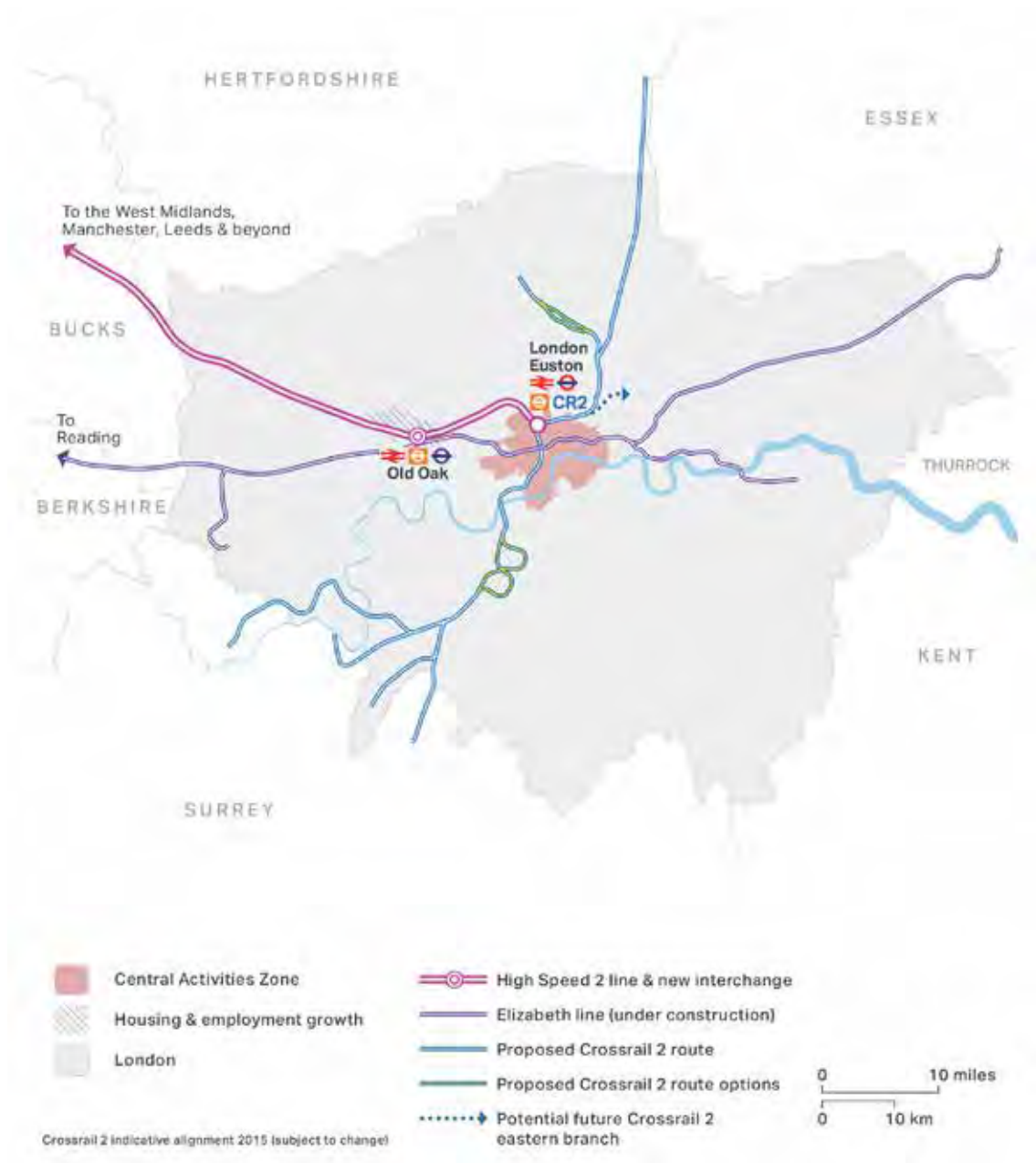
104 Transport for London, ‘Have your say on two potential new London Overground stations at Old Oak’, 19 December 2018: <https://consultations.tfl.gov.uk/london-overground/old-oak-common/?cid=old-oak-common> [accessed 1 May 2019]

105 The tunnel will be a 7.4 kilometre twin-bore tunnel. High Speed 2 Ltd, ‘London-West Midlands Environmental Statement Volume 1’, November 2013: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/259491/Volume\\_1\\_Introduction\\_to\\_the\\_Environmental\\_Statement\\_and\\_the\\_Proposed\\_Scheme.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/259491/Volume_1_Introduction_to_the_Environmental_Statement_and_the_Proposed_Scheme.pdf) [accessed 1 May 2019]

106 Economic Affairs Committee, *The Economics of High Speed 2*, p 18

134. Our follow-up work looked again at terminating at Old Oak Common rather than Euston and also considered whether Old Oak Common could operate as the London terminus for Phase 1 and Phase 2a, allowing more time for the redevelopment of Euston station.

**Figure 2: Integration of HS2 with the Elizabeth Line**



Source: Mayor of London, Mayor's Transport Strategy, March 2018: <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf> [accessed on 10 May 2019]

### *Onward journey times from Old Oak Common*

135. The onward journey times from Old Oak Common using the Elizabeth Line and High Speed 2 into Euston are compared to selected destinations in Table 16.



**Table 16: Onward journey times to selected destinations from Old Oak Common via the Elizabeth Line and High Speed 2<sup>107</sup>**

Destination	Journeys from Old Oak Common via HS2 <sup>108</sup>		Journeys from Old Oak Common via Elizabeth Line <sup>109</sup>	
	Time (min)	Additional interchanges <sup>110</sup>	Time (min)	Additional interchanges <sup>111</sup>
Bond Street / Oxford Street	9	0	7	0
Canary Wharf	35	1	21	0
City of London (Moorgate / Liverpool Street)	15	0	14	0
Kings Cross St Pancras	8	0	20	1
London Bridge	19	0	20	1
Stratford	36	1	23	0
Victoria	13	0	23	1
Waterloo	16	0	19	1
Westminster	24	1	15	1

Source: Crossrail, 'Journey Time Calculator': <http://www.crossrail.co.uk/route/> [accessed 1 May 2019], Transport for London, 'Plan a journey': <https://tfl.gov.uk/plan-a-journey/> [accessed 1 May 2019] & WhatDoTheyKnow, 'Gate-to-platform and interchange walking times', 25 January 2012: [https://www.whatdotheyknow.com/request/gate\\_to\\_platform\\_and\\_interchange](https://www.whatdotheyknow.com/request/gate_to_platform_and_interchange) [accessed 1 May 2019]

136. This a rough comparison: the interchange time in between alighting at Old Oak Common or Euston, and proceeding via the Elizabeth Line or the London Underground, is not included. HS2 Ltd have said that there will be a walk "of less than 100m" between High Speed 2 and the Elizabeth Line at Old Oak Common.<sup>112</sup>
137. Of these selected destinations, only Kings Cross St Pancras and Victoria have a substantial time saving from continuing on High Speed 2 to Euston rather than using the Elizabeth Line from Old Oak Common (with London Bridge

107 The journey time from Old Oak Common to Paddington on the Elizabeth Line has been assumed to be 4 minutes—the Old Oak Common station on the Elizabeth Line will be situated in between Acton Main Line and Paddington, estimated currently to be a 6 minute journey. Crossrail, 'Journey Time Calculator': <http://www.crossrail.co.uk/route/> [accessed 1 May 2019]

108 HS2 Ltd have assumed in previous analysis of journey times that the arrival-to-arrival time between Old Oak Common and Euston is seven minutes. High Speed 2 Ltd, 'Interaction between the London stations at Old Oak Common and Euston', August 2016: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/549818/Exhibit\\_Y\\_Strategic\\_options\\_from\\_House\\_of\\_Commons.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/549818/Exhibit_Y_Strategic_options_from_House_of_Commons.pdf) [accessed 1 May 2019]

109 A five-minute interchange has been assumed between the Elizabeth Line and London Underground lines.

110 All journeys will require an interchange at Euston between High Speed 2 and the London Underground. This interchange is excluded for the purposes of the comparison.

111 All journeys will require an interchange at Old Oak Common between High Speed 2 and the Elizabeth Line. This interchange is excluded for the purposes of the comparison.

112 Department for Transport, The Strategic Case for HS2, October 2013 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/260525/strategic-case.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/260525/strategic-case.pdf) [accessed 1 May 2019]

and Waterloo a similar journey time although with one fewer interchange via Euston).

*Old Oak Common as London terminus for full High Speed 2 network*

138. The Minister said that HS2 Ltd had assessed the merits of terminating at Old Oak Common rather than Euston, which “showed that terminating services at OOC would reduce benefits by over 15% and a revenue reduction of 10%.” Her “strong view is that permanently terminating at OOC would not offer the step change in connectivity that the nation needs, even if there is a cost saving.”<sup>113</sup>
139. These estimates of the reduced benefits are taken from a 2011 report by Atkins.<sup>114</sup> That report estimated that a terminus at Old Oak Common would reduce daily passenger numbers on HS2 from 157,500 to 142,500 which would reduce the net present value of the benefits by £3.8 billion and reduce revenue by £1.1 billion (2009 prices) relative to a terminus at Euston.
140. The Atkins report however did not consider what the corresponding reduction in cost would be: “these changes would need to be considered in association with cost implications of the change to identify the overall impact on the business case for HS2.”<sup>115</sup>

*Estimates of cost saving*

141. Michael Byng, a rail consultant, has estimated the cost saving of terminating at Old Oak Common rather than Euston to be £8 billion.<sup>116</sup>
142. Nusrat Ghani MP, Minister for HS2, said that the Department for Transport was aware of Mr Byng’s estimates:

“Neither HS2 Ltd nor my Department recognise the methodology behind Mr Byng’s cost estimate, and contest the underlying assumptions and the top line calculations which were developed without access to HS2 designs, specifications or standards. My officials have asked repeatedly for more detail behind these cost estimates and a number of assumptions remain unclear to us.”<sup>117</sup>

143. The Minister said that notwithstanding these issues, “£8bn is not an accurate representation of the cost saving from terminating at OOC.” She listed some costs by way of comparison, which Mark Thurston also provided to the Committee:

“HS2 Ltd has recently announced the Construction Partner Contract for Euston station which has a value of £1.65bn. This contract includes the provision of enabling works for Over Site Development above the HS2 station. The design and construction of the civils work required

113 [Letter from Nusrat Ghani MP to the Chairman](#), 19 February 2019

114 Atkins, ‘Report WP1 Analyses of London Interchange Options and Markets’, May 2011: <http://assets.hs2.org.uk/sites/default/files/inserts/Analyses%20of%20London%20Interchange%20Options.pdf> [accessed 1 March 2019]. Mark Thurston also referred to the same analysis in his [letter to the Chairman](#), 7 March 2019.

115 *Ibid.*

116 Lucy Pasha-Robinson, ‘HS2 ‘will be most expensive railway on Earth at £403m a mile’, *The Independent*, 16 July 2017: <https://www.independent.co.uk/news/uk/home-news/hs2-high-speed-railway-most-expensive-world-403-million-mile-michael-byng-a7843481.html> [accessed 1 May 2019]

117 [Letter from Nusrat Ghani MP to the Chairman](#), 19 February 2019

for the Euston tunnels and approaches is £0.6-0.9bn. We are not able to provide more granular details of other costs due to commercial sensitivity, but these are associated with acquiring land and property to enable the development of Euston station.”<sup>118</sup>

*Capacity of Old Oak Common to be London terminus for full HS2 network*

144. Mark Thurston reiterated what the Committee had been told during its previous inquiry: “the demand forecasting undertaken by HS2 Ltd indicated that around two thirds of HS2 passengers would choose Euston station over OOC.” He said Old Oak Common did not have the capacity to cope with passenger demand once the full High Speed 2 network opened:

“Permanently terminating all 18 trains per hour from Phase 2b services at OOC would require additional turnback facilities and/or platforms which would require additional land and therefore cost. The station is also currently sized for approximately one third of HS2 passengers to interchange there, meaning that the station would need to be resized at additional cost ...

... Passengers travelling north-south will tend to see onward opportunities from Euston station whereas those wishing to travel east-west will seek to interchange at OOC. OOC has onward connectivity to Crossrail [the Elizabeth Line] and the Great Western Main Line, but it does not have the capacity to cope [with] the additional demand from Phase 2b services permanently.”<sup>119</sup>

145. Ben Still, Managing Director of the West Yorkshire Combined Authority, said the “strength of strategic rail comes from the fact that you can locate it in city centres.” He said that maximised the connectivity benefits and therefore the economic benefits. “If HS2 terminates at Old Oak Common, there is a significant risk that you would lose some of that for both directions of travel.”<sup>120</sup>

*Old Oak Common as London terminus for Phase 1 and Phase 2a*

146. The Minister accepted that a terminus at Old Oak Common for Phase 1 and Phase would have fewer issues in terms of capacity but would require additional spending on the station:

“Temporarily terminating at OOC, for example until Phase 2b is operational, would have fewer issues in terms of onward travel connections but would still likely require additional infrastructure to turn around the 10 trains per hour envisaged in Phase One ... initial analysis indicates only 6-8 trains per hour can be reliably terminated at OOC with the existing infrastructure. It would also complicate the construction process ... completing the OOC to Euston section in Phase 2b, would require a new location for a tunnelling and spoil processing facility to be found at additional cost.”<sup>121</sup>

147. Sir Terry Morgan was however in favour of this option. He described the engineering work involved in redeveloping Euston station as “very

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118 [Letter from Mark Thurston to the Chairman](#), 7 March 2019

119 [Letter from Mark Thurston to the Chairman](#), 7 March 2019

120 [Q 58](#) (Ben Still)

121 [Letter from Nusrat Ghani MP to the Chairman](#), 19 February 2019



complex”“just getting the ground cleared at Euston ready to start the build means spending an extraordinary amount of money. There is a lot of history in the area. Tens of thousands of bodies will have to be moved away from the Euston area, which is hugely challenging.”

148. He said he would “disconnect Euston from Phase One. I would let it come as safely and quickly as it can and take a slightly more balanced view on whether we need Euston on the critical path.” He warned that if too much pressure was put on the redevelopment of Euston to be completed in time for the opening of Phase One in 2026, “it will cost ... Take Euston off the critical path and allow the programme team to work out the best way to manage that project ... it is possible to vary the timing of Euston versus Old Oak Common. Old Oak Common would be ready. It is a much simpler thing to do.”
149. Bridget Rosewell said she was “very worried” about the redevelopment of Euston over the next decade and the disruption that would cause: “We should do anything we can to simplify that, such as phasing it a bit more slowly.” She said Phase One should be built to Old Oak Common, “get some trains running, see how people use them and see what the interchange actually looks like in practice when people use it.”<sup>122</sup>
150. Chris Stokes also referenced the disruption that will be caused to existing services at Euston and said Old Oak Common was “probably capable” of dealing with passengers from Phase One and Phase 2a. A delay to redeveloping Euston “would allow an opportunity to, frankly, review more radically whether Euston was the right place to terminate the service in any case.”<sup>123</sup>
151. **It is disappointing that the Government ignored our recommendation to assess the cost saving that could be made by terminating the line at Old Oak Common rather than Euston. The Government and HS2 Ltd cite a 2011 report from Atkins as the evidence base for rejecting the proposal, but that report assessed only the reduction in benefits and made no estimate of the possible cost saving.**
152. **The Government has argued that High Speed 2 has to finish in ‘central London’, which is taken to mean Euston. But this does not follow. What matters is not the single point of the terminus, but the connections that enable passengers to get to their final destination. Onward journey times to final destinations using the Elizabeth Line from Old Oak Common appear in most cases to be comparable, or better than, continuing from Old Oak Common on High Speed 2 to Euston.**
153. *We agree with Sir Terry Morgan that the redevelopment of Euston station should be removed from the scope of Phase One of High Speed 2. Old Oak Common should operate as the London terminus for Phase One and Phase 2a.*
154. *Postponing the redevelopment of Euston station to Phase 2b will allow time for a full assessment of the modifications required to allow Old Oak Common to operate as the London terminus to the*

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122 [Q 40](#) (Bridget Rosewell)

123 [Q 40](#) (Chris Stokes)

*full High Speed 2 network, and the cost saving that would achieve relative to a terminus at Euston.*

155. *The Government should publish its analysis of the cost savings from reducing speed and terminating at Old Oak Common alongside the full business case by the end of 2019.*

## APPENDIX 1: LIST OF MEMBERS AND DECLARATIONS OF INTEREST

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### Members

Baroness Bowles of Berkhamsted  
 Lord Burns  
 Lord Darling of Roulanish  
 Lord Forsyth of Drumlean (Chairman)  
 Baroness Harding of Winscombe  
 Lord Kerr of Kinlochard  
 Baroness Kingsmill  
 Lord Lamont of Lerwick  
 Lord Layard  
 Lord Livermore  
 Lord Sharkey  
 Lord Tugendhat  
 Lord Turnbull

### Declarations of interest

Baroness Bowles of Berkhamsted  
*No relevant interests*  
 Lord Burns  
*No relevant interests*  
 Lord Darling of Roulanish  
*Director of Morgan Stanley*  
 Lord Forsyth of Drumlean (Chairman)  
*Non Executive Director J&J Denholm Ltd*  
 Baroness Harding of Winscombe  
*No relevant interests*  
 Lord Kerr of Kinlochard  
*Deputy Chairman, Scottish Power PLC*  
 Baroness Kingsmill  
*No relevant interests*  
 Lord Lamont of Lerwick  
*Adviser, Global Board of Advisers, Meinhardt Group (Singapore)*  
*Consultant, RSK Group Limited (environmental consultancy)*  
 Lord Layard  
*No relevant interests*  
 Lord Livermore  
*No relevant interests*  
 Lord Sharkey  
*No relevant interests*  
 Lord Tugendhat  
*No relevant interests*  
 Lord Turnbull  
*No relevant interests*

A full list of Members' interests can be found in the Register of Lords' Interests:  
<http://www.parliament.uk/mps-lords-and-offices/standards-and-interests/register-of-lords-interests/>

## APPENDIX 2: LIST OF WITNESSES

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Evidence is published online at: <https://www.parliament.uk/hleconomicaffairs/publications> and available for inspection at the Parliamentary Archives (020 7219 3074).

Evidence received by the Committee is listed below in chronological order of oral evidence session and in alphabetical order. No written evidence was accepted for this inquiry.

Sir Terry Morgan CBE, former Chairman of HS2 and Crossrail	<a href="#"><u>QQ 1–16</u></a>
Nusrat Ghani MP, Parliamentary Under Secretary of State, Department for Transport	<a href="#"><u>QQ 17–36</u></a>
Clive Maxwell, Director General, High Speed and Major Rail Projects Group, Department for Transport	<a href="#"><u>QQ 17–36</u></a>
Dr Nick Bisson, Director, HS2 Phase 2 and Northern Powerhouse Rail, Department for Transport	<a href="#"><u>QQ 17–36</u></a>
Bridget Rosewell CBE, Founder, Volterra	<a href="#"><u>QQ 37–48</u></a>
Chris Stokes, Independent Rail Consultant	<a href="#"><u>QQ 37–48</u></a>
Dr Ben Still, Managing Director, West Yorkshire Combined Authority	<a href="#"><u>QQ 49–60</u></a>
Simon Warburton, Transport Strategy Director, Transport for Greater Manchester	<a href="#"><u>QQ 49–60</u></a>
Barry White, Chief Executive, Transport for the North	<a href="#"><u>QQ 49–60</u></a>
Tim Wood, Northern Powerhouse Rail Director, Transport for the North	<a href="#"><u>QQ 49–60</u></a>

## Genway, Tom

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**From:** Potter Mr.J [REDACTED]  
**Sent:** 08 July 2019 21:06  
**To:** Policy; Programme Officer  
**Subject:** Consultation Response

July 8th, 2019

To, Planning Policy  
Broxtowe Borough Council  
Foster Avenue  
Beeston  
Nottinghamshire NG9 1AB

& to the Programme Officer, Lisa Snow

Reference: pt2lp(mm4:unsound/unjustified)

Online form is unwieldy.

To bring to the Inspector's and the Planning Inspectorate's attention that two lots of timing overlaps re three Examinations Hearings sessions for example, disadvantages smaller, campaign organizations and those, public interested in general, from attendance, participation or observation; unfair, so ought not to: have happened, be a recurrent pattern.

Respondent ID 3630 is minded that Brexit should aid the scrapping of proposed hs2 phase2b eastern leg, with regard to North West Leicestershire and Rushcliffe countryside.

- - - - -  
**From:** Mr J Potter  
**Sent:** 02.11.2017 17:40  
**To:** [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

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[REDACTED]  
[REDACTED]  
[REDACTED]

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	Bloor Homes Ltd
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## Your Details

Title	Mr	Mrs	Miss	Ms	Other: Mr
Name	Ben Holmes				
Organisation (if responding on behalf of an organisation)	Oxalis Planning Ltd				
Address	[REDACTED]				
Postcode	[REDACTED]				
Tel. Number	[REDACTED]				
E-mail address	[REDACTED]				

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]	

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.  
**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

4

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

☐

Object

☒

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☒

It is not positively prepared e.g. strategy will not meet development needs

☒

It is not effective i.e. it won't work

☒

It isn't consistent with national policy

☒

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

Please see attached Statement and Appendices 1 & 2

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



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**BROXTOWE BOROUGH COUNCIL**  
**Local Plan Part 2:**  
**MAIN MODIFICATION 4.**

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Representations on behalf of  
BLOOR HOMES

July 2019



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- 1.0 Introduction.**
- 2.0 Representation to Main Modifications: 4.**

**Appendix One: Bloors Land Ownership to the north-east of the Toton Strategic Location for Growth.**

**Appendix Two: Report to the County Council Leader on the Housing Infrastructure (HIF) bid to Homes England.**

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## **1.0 Introduction**

- 1.1 These representations have been prepared on behalf of Bloor Homes who have a number of land interests in Broxtowe. We have previously made representations to Broxtowe for many years on behalf of Bloor Homes during both the development of the Greater Nottingham Aligned Core Strategies (ACS) and earlier consultation stages of the Local Plan Part 2 (LPP2).
- 1.2 Bloor Homes have serious concerns about the soundness of LPP2, particularly in relation to the approach to housing and the allocation at Toton, and object to the modifications set out. Details of their concerns are set out in these representations which highlight the confused approach to Policy 3.2, respond to the main modifications being proposed and comment on Policy as a whole. These representations also outline modifications to LPP2 which are considered necessary to make it sound.

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## **2.0 Main Modification 4: Changes to Policy 3.2 Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)**

### **Confused approach to Policy 3.2**

- 2.1 The land at Toton, east and west of Toton Lane, is exceptionally well-placed to meet the land use needs of the Borough and contribute to the economic growth of the East Midlands region in a highly sustainable way. The area benefits from a new tram terminus providing unrivalled public transport connections, access to the highway network and good access to existing services and facilities. The area does not have any environmental designations which would preclude development. The opportunities presented by HS2 are truly 'once in a lifetime' and together with the existing attributes of the location, warrant a comprehensive, well-planned and ambitious scheme. As such the opportunities for a sustainable mixed-use development to meet the land use needs of the area should be maximised.
- 2.2 However, the planning of the Toton site is also challenging and complex, given the uncertainties about HS2 and the commercial opportunities that it will bring. To ensure that the area can respond in the best way to HS2 the planning of those areas of the site closest to the HS2 Station Hub must remain flexible and not unduly constrained.
- 2.3 For the opportunities presented by this location to be materialised (we support the Council's growing ambition for this area in terms of potential housing delivery and believe the Council should be more ambitious in relation to commercial opportunities and green space), the sites availability of these uses should also be maximised.
- 2.4 Unfortunately, the Council are limiting the potential of the area because of a restriction of the allocation site area. For the reasons we set out in these representations we do not think their land use objectives can be achieved as a result and the Plan is therefore unsound.
- 2.5 The planning of the area is also, unfortunately, constrained by the extant planning permission for 500 homes (the Peveril scheme). It is unclear what the Council expect to happen with this scheme; the Plan is therefore confusing and unclear and cannot be sound in its current form. On the one hand it appears that the Council are wholly reliant on the Peveril scheme to deliver their 5-year housing land requirement and Plan period requirement and, from this, one would assume that the Council foresee the approved scheme being implemented and built out (see paragraph 3.23). However on the other hand, the allocation for Toton appears to pay no regard to the Peveril scheme either in the Illustrative Concept Framework (Map 8), policy text or supportive text (see paragraph 3.29) which proposes an alternative vision. From this it appears that the ambition is for the Peveril scheme to be replaced by something more appropriate for a site located immediately adjacent to the HS2 Station Hub.
- 2.6 Whilst some uncertainty about what might happen with the Peveril scheme is not in itself unacceptable or unsound, a Plan which cherry picks what might happen to help particular parts of the Plan, clearly is.
- 2.7 So, if the Council's intention is to provide an allocation at Toton which encourages the abandonment of the Peveril permissions, it cannot at the same time assume delivery of the Peveril scheme in its 5-year supply assumptions.

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## Response to main modifications

2.8 Bloor Homes strongly support the identification of land at Toton for a major mixed-use development and welcome the following positive main modifications in the policy:

- Part A introductory text – we welcome that an Illustrative Concept Framework (Map 8) has been developed for the allocation;
- Points A.i and D.xviii – a proposed increase in housing at Toton within the Plan period from 500 to 800 homes;
- Point A.i – the inclusion of an overall capacity for the site of around 3,000 homes;
- Point A.v – the provision of a multi-functional green infrastructure corridor to the south of the area;
- Point A.vii – requirement for development to be located and designed to complement and not prejudice proposals for access to the HS2 Hub Station and further build-out of an Innovation Campus; and
- Parts B and D introductory text – requirement for a Strategic Masterplan to be prepared which will demonstrate how the site will be brought forward on a phased basis and detail the type, quantum of development within the site.

2.9 However, the Council's approach to the Toton allocation, as proposed to be modified in Policy 3.2 and its supporting text, is totally confused. It does not provide a clear policy basis for either the overall housing ambitions for the site or the Plan period housing requirements, to be met. The policy together with the Illustrative Concept Framework do not provide the necessary clarity and certainty needed to 'effectively' promote and control the development of the site. As a result, it cannot be sound.

2.10 In particular, we object to the following proposed main modifications:

- Part A introductory text and Illustrative Concept Framework (Map 8) – we consider that Map 8 and the text within the policy relating to the Framework as a whole have several key issues which result in it being undeliverable and not sound. These are:
  - They contradict the existing Peveril scheme permissions which covers the central portion of the site and although referenced in the supporting text of the policy (see paragraph 3.23), is not referenced or reflected in Map 8 or the policy text which promotes higher densities and a transition in both scale and use of building north of the residential led area along the southern boundary of the site (see paragraph 3.29).
  - They do not demonstrate how space for the 3,000 homes ambition will be delivered;
  - Includes a '*potential vehicle access*' road off the A52, one of the '*key roads*' detailed in paragraph 3.28, which is outside and slightly isolated from the allocation boundary. Such an approach makes little sense in planning terms. Clearly if such a major piece of infrastructure is to be located here, the character

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and appearance of the area will change greatly and developments should therefore be supported in this area.

- We consider that in order to deliver the Council's ambitions and take advantage of the opportunities a HS2 Hub Station will bring to the area, the site boundaries should be extended to remove land to the north-east of the Toton site from the Green Belt and include it within the allocation (see **Appendix 1**). The inclusion of this land would facilitate appropriate infrastructure works and enable a more comprehensive approach to the masterplanning of the area, as well as helping to ensure that the housing and other land use requirements now promoted by the Council can be achieved;
- Points A.i and D.xviii – although we support the inclusion of the 3,000 homes capacity figure within the allocation, we do not consider that the policy as set out provides the necessary land and clear policy framework for this to be achieved;
- Points A.iii and D.xxii – we support the provision for new employment space and new jobs within the allocation but consider that the Council should be significantly more ambitious than the 18,000 sqm minimum detailed in the policy. We are disappointed to note that the ambition for 1,000,000 sqm of mixed-use floorspace, as previously outlined in deleted paragraph 3b.13, is no longer included in the policy. We are of the opinion that the policy should be more reflective of the three masterplan documents prepared by the East Midlands Councils (EMC) in September 2016, September 2016 (also endorsed by the D2N2 LEP and Leicester and Leicestershire LEPS) and October 2017 which advocated the site becoming an '*Economic Growth Pole*' for the region delivering up to 10,000 high quality jobs on site, and as such, should make greater provision or employment space within the vicinity of the HS2 Hub Station. We also consider that the policy should also be clearer as to where and how employment land would be developed within the Plan period;
- Parts B and D introductory text – the approach to develop a Strategic Masterplan to provide a framework for development on the site beyond the Plan period is currently wholly incompatible with the Plan period requirements. It is unclear how the Council expect the 800 homes, 18,000 sqm of employment space, neighbourhood and community facilities, multi-functional green infrastructure and highways infrastructure within the Plan period whilst retaining flexibility for a Strategic Masterplan for the area for development beyond the Plan period (including a further 2,000 plus homes). The policy as currently set out is not clear about where and how the Plan period requirements will be delivered and then, what land it envisages remaining 'open' for strategic masterplanning. The policy should require a Strategic Masterplan to be prepared and approved now prior to any development occurring on the site in order for all aspects of the allocation to be sustainably planned and delivered. This is particularly important in view of the uncertainties surrounding the HS2 Hub Station and the need to be flexible in the area closest to the station and respond to the opportunities it could provide.

2.11 In order for LPP2 to be sound, the text in Policy 3.2 should be amended to include:

- An open and flexible approach to the delivery of development within the vicinity of the HS2 Station Hub, east of the existing rail sidings, with a particular emphasis on employment space to meet the opportunities presented by HS2 and growth plans and

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ambitions of the East Midlands Councils, the D2N2 LEP and Leicester and Leicestershire LEP;

- Be clear about whether the Peveril scheme is to be brought forward as presently permitted and how the Council would then deliver the 3,000 homes ambition in addition to a HS2 Hub Station, employment space, green infrastructure, highways infrastructure and community facilities;
- Require a Strategic Masterplan to be prepared and approved by the Council prior to the delivery of any development on the site, both in the Plan period and after, in order to ensure a forward planning approach which will not constrain future development;
- Include additional land to the north-east of the allocation (in our client's land see **Appendix 1**)), to be masterplanned as part of the masterplanning of the whole site but which might particularly contribute to:
  - Delivery of necessary highway infrastructure;
  - Delivery of significant new housing;
  - Delivery of extensive green space, including the potential to create a community park.

### Comments on Policy 3.2

2.12 The new Map 8, included within Policy 3.2, outlines an Illustrative Concept Framework for the Toton allocation and part A of the '*Key Development Requirements within the plan period*' notes that '*development proposals will be required to be in general conformity*' with the map. The map, and Policy 3.2 in general however, fail in several aspects relevant to the realities of the site and opportunities that the allocation should present concerning housing, employment space, highways infrastructure and masterplanning. Each point is considered in turn below.

#### Housing:

- 2.13 With or without the implementation of the Peveril scheme we do not consider that the proposed allocation will be capable of delivering the 3,000 homes ambition outlined in Policy 3.2 as neither Map 8 or the text within the policy provide clarity in how this level of housing, in addition to the employment space, green infrastructure, highways infrastructure and a local community centre could be realistically delivered within the allocation.
- 2.14 We consider that in order to support the Council's housing ambitions for Policy 3.2, the site boundaries should be extended to the north-east of the Toton allocation (see **Appendix 1**) to help deliver additional homes which will make a significant contribution towards the Council's ambitions.
- 2.15 Without the inclusion of our client's land to the north-east of the Toton allocation, the visions and ambitions of Policy 3.2 will not be capable of delivering 3,000 homes and therefore the Plan is not sound.



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#### Employment space:

- 2.16 Policy 3.2, Point A. iii) of the '*Key Development Requirements within the plan period*' requires that a minimum of 18,000 sqm of mixed employment (B use class) will be delivered to support the realisation of an Innovation Campus. We consider that this approach is staggeringly unambitious in light of the employment potential provided by the proposed HS2 hub station at Toton. Indeed, as detailed in our representations to Matter 7, dated November 2018, the East Midlands Councils (EMC) and representatives from the D2N2 LEP, the Leicester and Leicestershire LEP, East Midlands Chamber and Rail Forum all endorsed a document entitled 'East Midlands HS2 Growth Strategy: World Class – Locally Driven' which sets out a vision for maximising the economic prize created by HS2. Also, in the statement of common ground between Nottinghamshire County Council and Broxtowe Borough Council on Policy 3.2, dated 05 December 2018, the County Council identified the potential for Toton to accommodate '*significantly more (but unquantified) employment floorspace*', than is currently being planned in the policy.
- 2.17 Furthermore, as outlined in our representations to the LPP2 publication version in October 2017, the opportunities presented by a HS2 hub station at Toton mirror those at the Solihull Interchange where the local authority are planning for significantly more employment to align with the sustainable connections major rail hub stations provide. In contrast, the 18,000 sqm minimum figure detailed in Policy 3.2 is inconsequential and is not the most appropriate strategy as required by paragraph 182 of the 2012 NPPF. Indeed, it is disappointing to see the ambition for 1,000,000 sqm of floorspace removed from the supporting text for the policy.
- 2.18 It is evident therefore that the draft LPP2 is not positively prepared or effective as it does not represent the views of the EMC or East Midlands LEPs which are promoting significantly more employment space than is being planned for in the Toton allocation. Indeed, by restricting employment space on the site the Council will limit job creation throughout the region. The Council will therefore need to extend the allocation boundary to include land to the north-east in order to provide a more positive and effective plan which can be justified when considering the opportunities presented by HS2.

#### Highways infrastructure:

- 2.19 Map 8 indicates an indicative '*potential vehicle access road*' off the A52 which runs through an area to the north-east, and outside of the proposed allocation site. The position of this road mirrors a proposed highways solution developed and put forward by Bloor Homes as far back as 2011. In this respect we support its identification. However, it clearly would make little sense for such a major piece of new infrastructure, which would form a fundamental part of the access to the Toton scheme, to be developed in isolation. It would change the character and appearance of the area such that development around and adjacent to it would be appropriate and sensible. All the land in this area should be included in the allocation and properly masterplanned. It provides the opportunity to deliver the infrastructure link, develop housing to help meet the Council's ambitions for the Toton allocation and also implement green infrastructure and open space for the benefit of the local community.
- 2.20 A link is also proposed from the allocation to the proposed development at Chetwynd Barracks. It should be noted that this link would run also through land in our client's interest and, as detailed earlier in these representations, our client has not been approached to discuss how the infrastructure might be developed.

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- 2.21 The HIF bid submitted by the County Council indicates that with the appropriate infrastructure in place, there is a capacity for around 3,700 homes at Toton. In the report to the Leader of the County Council on the HIF Bid, dated 20 March 2019 (see **Appendix 2**), the report details that part of the bid includes the construction of a link road to help deliver housing at both Toton and Chetwynd. It is clear that our client's land is essential for the delivery of the link road between the Toton and Chetwynd Barracks allocations and thereby help deliver the Council's ambitions as outlined in Policies 3.1 and 3.2 of LPP2 to develop approximately 4,500 homes between the two sites.

Masterplanning:

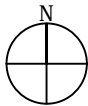
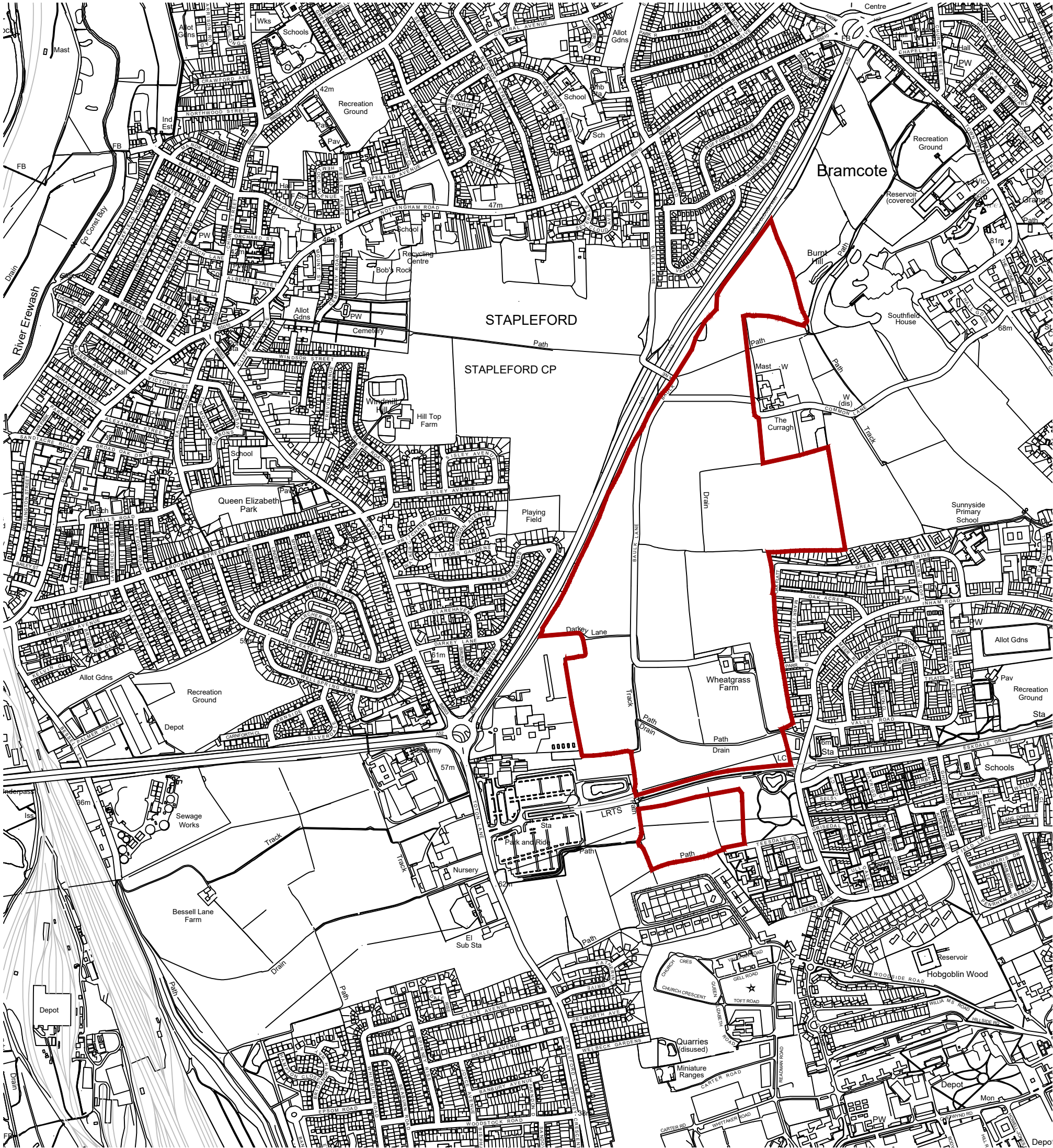
- 2.22 Policy 3.2, Point B of the '*Key Development Requirements within the plan period*' requires that a 'strategic masterplan must be prepared for development expected to be delivered beyond the plan period' and sets a date for its approval by December 2020. Although we welcome a strategic masterplan being prepared for the site, we do not consider that it will resolve the significant existing flaws in the Council's approach in the draft LPP2. Furthermore, we struggle to understand how this is compatible with the Council's targets for housing delivery on the site, over the Plan period and next 5 years.
- 2.23 In the first instance, the Council's current ambitions, as laid out in Map 8 and within the text of Policy 3.2, do not align with the existing Peveril scheme permissions which constrains the development of the allocation by covering the central portion of the site. We struggle to see how the Council's ambitions for 3,000 homes will be delivered in view of the space left around the Peveril site. Furthermore, although supportive text in the policy explains that there will be no delay in bringing forward the Peveril scheme (paragraph 3.25), the Illustrative Concept Framework (Map 8), the wording in the policy and other supportive text paragraphs (3.29) offer a different vision for the allocation with no reference to the Peveril permission. The policy is therefore confusing. In order for the policy to be justified in accordance with paragraph 182 of the (2012) NPPF, the strategy within it should be clear and therefore the Council should be clear in both the wording of the policy and the Illustrative Concept Framework (Map 8) about whether the Peveril scheme will be developed as permitted and how this accords with the Council's ambitions for 3,000 homes in the allocation. The Council cannot have one approach to satisfy their 5-year supply and another approach to satisfy their wider ambitions for the Toton allocation.
- 2.24 We are further confused by the approach in the policy to prepare the Strategic Masterplan for development which is '*expected to be delivered beyond the plan period at Toton Strategic Location for Growth*'. Setting out a plan for a strategic site after 800 homes, 18,000 sqm of employment space, neighbourhood and community facilities, multi-functional green infrastructure and highways infrastructure are already proposed to be delivered will severely restrict the opportunities for a proper masterplanning process to be developed for the allocation. This cannot be considered to be positively prepared, justified or effective as the adopted process would be reactive to development on the site rather than forward planning for the whole allocation.
- 2.25 Policy 3.2 and Map 8 also significantly differ from the growth plans and ambitions of the EMC, the D2N2 LEP and Leicester and Leicestershire LEPs who consider that the land at Toton provides a unique opportunity to develop a world class integrated transport hub through HS2 which would be a focus for job creation and economic development in the region. The lack of employment development allocated within Policy 3.2 and Map 8 is contradictory to the growth plans of the EMC and East Midlands and as such, in order for the policy to be justified,

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the policy and Map 8 should accommodate more opportunities for employment space development in order to respond to the development of the HS2 Hub Station.

- 2.26 In addition, in the justification for Policy 3.2, the Council continues the aspiration that land to the east of Toton Lane could *'incorporate a leisure and education hub with a relocated George Spencer Academy'*. However, these aspirations have still not been discussed with our client (and landowner) and it remains wholly unclear how these components can be delivered in terms of viability and land assembly or how they would be funded.
- 2.27 We are strongly of the opinion that the site boundaries as set out will not be sufficient to deliver the Council's ambitions for the Toton allocation. However, there is the opportunity to allocate a larger area of land to the north-east of the existing allocation which would provide the opportunity to propose a more comprehensive masterplan and to deliver the infrastructure, housing, employment and green infrastructure ambitions now set out.





Project  
**Stapleford  
Nottingham**

Drawing Title  
**Bloor Homes Land  
Site Boundary**

Date  
05.17.19

Scale  
1:10,000

Drawn by  
SP

Check by  
BW

Project No  
28924

Drawing No  
9000

Revision  
-

DRAFT

BARTON  
WILLMORE

Planning Master Planning & Urban Design Architecture  
Landscape Planning & Design Environmental Planning Graphic  
Communication Public Engagement Development Economics

## **REPORT OF THE LEADER OF THE COUNCIL**

### **HOUSING INFRASTRUCTURE FUND (HIF) BID SUBMISSION**

#### **Purpose of the Report**

1. To seek Policy Committee approval to submit the Housing Investment Fund (HIF) bid business case to Homes England by 22 March 2019.

#### **Information**

2. The Housing Investment Fund is a government capital grant programme of up to £5.5 billion, which will help to deliver over half a million new homes in total. It is intended to deliver physical infrastructure to support new and existing communities and support ambitious local authorities who want to progress their plans for growth. All funding must be committed by March 2024.
3. In late 2017, Nottinghamshire County Council, working closely with Local Authority partners and in close consultation with Homes England, led the submission of an expression of interest (EOI) for a HIF forward funding bid. At the outset of the HIF forward funding programme, the government required bids to be led by upper tier authorities. In Nottinghamshire the bid is focused on new road infrastructure to unlock high quality housing in the Toton HS2 Growth Hub and adjoining Chetwynd Barracks.
4. The bid entitled "East Midlands HS2 network of garden villages" was derived from the East Midlands HS2 Growth Strategy which was approved by Policy Committee and other partners across the East Midlands in September 2017. The bid is focused on providing key infrastructure to unlock new housing in strategic locations across the East Midlands. The EOI was successful and in March 2018 it was announced it had been shortlisted. The proposal initially involved five sites based on the East Midlands HS2 Growth Strategy and includes sites being promoted by Derby City Council and Derbyshire County Council, working closely with the respective district councils.
5. The HIF bid is now in its second stage with a submission deadline of 22 March 2019. It is proposed that authority to approve the business case to Homes England is delegated to the Corporate Director Place and Section 151 Officer, in consultation with the Chairman of the Policy Committee. The content of the business case will also be agreed with our partner authorities prior to submission.
6. Local authority bids are to be competitively assessed and must demonstrate how well they meet the following criteria:
  - Adopting a strategic approach, with strong local leadership and joint working to achieve higher levels of housing growth in the local area



- Value for money
  - The proposal must demonstrate that delivery is feasible with investment in infrastructure unlocking the delivery of new homes.
7. The East Midlands HIF £76m bid is led by Nottinghamshire County Council in partnership with two other upper tier authorities, Derbyshire County Council and Derby City Council, together with Chesterfield Borough Council, Broxtowe Borough Council and South Derbyshire District Council.
8. A key component of the HS2 Growth Strategy is the identification of two growth zones and an associated network of Garden Villages. In response to this opportunity, local councils in the East Midlands have identified key infrastructure developments that will support the delivery of over 14,000 new homes of a high quality and design with excellent local facilities such as schools and open spaces. The East Midlands HIF bid centres on delivering transformational levels of new homes in each of the following Growth Zones:
- **East Midlands HS2 Hub Growth Zone:** the Hub station site at Toton and the adjacent Chetwynd Barracks, together with the associated Garden Village development at Infinity Garden Village in Derby
  - **Northern HS2 Growth Zone** – the areas around the existing railway station in Chesterfield, which will receive HS2 services via the electrified Midland Mainline and purpose built spur to Clay Cross, and the proposed HS2 Infrastructure Maintenance Depot (IMD) at Staveley which will maintain the line through to Leeds.
9. Led by Nottinghamshire County Council, the bidding process has been a collaboration across East Midlands Councils co-produced with Homes England providing technical support and advice. Homes England have also provided the funding to prepare the bid. Since the expression of interest was submitted the details of the final bid have changed to reflect technical advice from Homes England and the removal and addition of sites in Chesterfield and Derby to reflect deliverability. The proposals have been refined and now focus on the following sites.

<b>Table 2: HS2 East Midland – Network of Garden Villages (Stage 2)</b>		
<b>Scheme</b>	<b>HIF</b>	<b>Homes</b>
Wider Infinity Garden Village <sup>1</sup>	£25m	4,700
Toton & Chetwynd	£26.5m	3,700
Chesterfield Town Centre	£21.95m	4,210
<b>TOTAL</b>	<b>£76.45m</b>	<b>12,610</b>

<sup>1</sup> This includes a HIF ask of £5m and 800 houses associated with Boulton Moor

10. The map below illustrates the HS2 Growth Zones and network of HS2 Garden Villages.



11. This report focusses primarily on the strategy for Toton and Chetwynd as the sites being promoted within Nottinghamshire. It also provides a preliminary outline regarding the wider context and implications of the bid in terms of Nottinghamshire County Council's proposed role as the accountable body. As detailed below it is proposed to take a delegative approach to implementation. It is envisaged at this stage that the County Council, if the bid is successful in principle, will look to enter into back-to-back agreements with the other authorities participating in the bid i.e. Derby City Council and Derbyshire County Council as the upper tier authorities responsible for the Infinity Park and Chesterfield components of the bid. This is however subject to the outcome of legal advice and discussions with our local authority partners.

12. For a programme of this scale and complexity it is necessary to bring on board the very best advice and expertise at the right time. An expert team of advisers has therefore been brought on board by the partners, using grant funding from Homes England. All consultants engaged to deliver work for the HIF bid have been commissioned in line with Nottinghamshire County Council procurement requirements. The team includes:

- Amion consulting are project managing the bid and providing the overarching economic and business case;
- Thomas Lister are providing commercial agency advice;
- DWF Solicitors have been commissioned to provide specialist legal advice on the compatibility of the HIF bid with state aid regulations. DWF are on the Homes England Legal Panel and are state aid specialists; and
- Faithful and Gould providing an independent review of costs and ensuring value for money.

The above team are working across the programme to review all aspects of the bid. Each area team also has specialists working on the details of their specific proposals.

## Progress – Toton & Chetwynd

13. The project specific team for Toton and Chetwynd includes a team of transport planners (AECOM) and traffic modellers (Systra), supported by local authority transport teams. The data provided by this transport modelling will have wider benefits for partners and will be used to inform other projects. Commercial agency advice including land strategy advice has been provided by Cushman and Wakefield with Strategic Planning support provided by Arup. The latter has been crucial to securing greater alignment between the Growth East Midlands HS2 Growth Strategy and Broxtowe Part 2 Local Plan and in particular the potential to realise a development capacity in excess of 4,500 upto 2045.
14. This total is comprised of 3,000 new homes at Toton and 1,500 at Chetwynd Barracks reflecting the capacity figure which Broxtowe BC has included as suggested modifications to the amended Broxtowe Local Plan and its examination. Although the local plan examination process has therefore helped identify a capacity of 4,500, the infrastructure identified in the HIF bid will actually facilitate 3,700 homes.
15. A Strategic Masterplan will be prepared to ensure that growth expected beyond the Plan period is delivered in a co-ordinated and collaborative way. These new homes are therefore in line with local plan growth aspirations delivering new high quality homes with new open spaces and community facilities.
16. Although not the focus for the HIF bid, the infrastructure works also facilitates the future development of the Innovation Campus which could create up to 10,000 high quality jobs.
17. Artist's impression of the vision for Toton, including the Innovation Campus:







18. The HS2 Growth Strategy was endorsed at the Policy Committee meeting held in September 2017. It highlights a three phased approach to improving the highway capacity in the Toton and Chetwynd area. The first phase, Toton Lane Link Road is designed to provide additional capacity to address existing congestion at Bardills Island, whilst also providing a much needed link to the north of Chetwynd Barracks and the creation of improved links between Chilwell and Toton. The HIF bid is focused on providing the essential funding for this critical link.
19. The planning strategy highlights the need for early development to be concentrated along the southern border of the strategic site at Toton. This is subject to detailed and positive consideration through Broxtowe Local Plan public examination. There are, however, a number of impediments to delivering this early phase, including the need to underground high voltage power cables.
20. Together the team has prepared a clear and robust evidence base to support capital investment through the HIF bid. This will be crucial to the delivery of housing at Toton and Chetwynd. It includes up to £26.5m for the construction of the link road, including land assembly and £6m for the undergrounding of high voltage power cables to ensure the realisation of a first phase of development.
21. The programme for growth at Toton continues to build momentum. Recent developments include:
  - Announcements to establish a Development Corporation for growth around Toton and including Ratcliffe and East Midlands Airport;
  - A joint bid by Nottinghamshire County Council and Broxtowe Borough Council for Future Places fund initiative <https://www.architecture.com/campaign/futureplace> ;
  - A linked bid has been submitted by Broxtowe Borough Council to designate Chetwynd as a Garden Community. <https://www.gov.uk/government/publications/garden-communities-prospectus> ; and
  - Representations made to the HS2 Working Draft Environmental Statement consultation including improved north/south and east/west connections through the area.
  - Acknowledgement in the emerging Broxtowe Part 2 Local Plan. The Inspector at the recent Independent Examination Hearing Sessions encouraged further dialogue between

key delivery partners at the two sites to put in place mechanisms to realise the vision set out in the Growth Strategy.

22. A successful HIF bid would enable Nottinghamshire County Council to deliver significant improvements to infrastructure which will benefit current Nottinghamshire residents as well as enabling us to support new and growing communities across the region. Furthermore, it would place us in an even stronger position to deliver our shared vision for Toton set out in the HS2 Growth Strategy as a place where future generations will aspire to live, work and spend leisure time. Connectivity and unlocking housing is critical to this.
23. We have secured letters of support from partners and key stakeholders to include with the HIF bid submission. These will form a vital part of the submission as they will demonstrate local support and engagement in proposals.

### **Governance and Accountable Body Status – Housing Infrastructure Fund**

24. In relation to the wider regional HIF bid itself, in taking on the accountable body status the Council will need to be satisfied that appropriate legal agreements are in place to protect its interests should the bid be successful. At the time of writing, legal advice is being sought on the implications of the authority acting as an accountable body, which will inform future discussions with our partner authorities (Derby City Council and Derbyshire County Council). No legal obligations are placed on the authority at the point of submission of the bid. Legal advice will have been received prior to the signing of any funding agreement and related contract in the event the bid is successful.
25. It is envisaged that in taking on accountable body status Nottinghamshire County Council will liaise with counterparts in Derbyshire County Council and Derby City Council who will take responsibility for their respective projects included in the bid i.e. schemes associated with Infinity Park, Derby together with projects to deliver new homes at Chesterfield.
26. In preparing the bid, the partners, including Nottinghamshire County Council as the lead authority, have secured £175,000 towards the costs of formulating the bid i.e. the costs highlighted in section 13 above. This funding has been secured through Homes England and is being administered through the County Council and the Section 151 Officer.
27. In terms of governance for the HIF bid, there is a Senior Officer Steering Group comprised of officers from each authority. Each of the projects will also be subject to consideration through respective decision making processes within host authorities i.e. Nottinghamshire County Council, Derbyshire County Council and Derby City Council.
28. Furthermore, the projects have wider oversight in terms of HS2 regional governance and specifically in the context of Toton, Chetwynd and Infinity Park, through the Toton Delivery Board and for the Northern Growth Zone, through the Chesterfield & Staveley Delivery Board.

### **Other Options Considered**

29. The „do-nothing“ option was discounted given the alignment with Nottinghamshire County Council's priorities. Not submitting a bid would mean missed opportunities to deliver infrastructure improvements for Nottinghamshire residents and to strengthen our position in relation to delivering the HS2 Growth Strategy ambitions.

## **Reason/s for Recommendation/s**

30. To ensure NCC has sufficient capacity to help drive the delivery of growth at Toton in a way that meets residents & business needs and aspirations. The HS2 programme is vital to the economic prosperity of the County and work needs to progress at pace.

## **Statutory and Policy Implications**

31. This report has been compiled after consideration of implications in respect of crime and disorder, data protection and information governance, finance, human resources, human rights, the NHS Constitution (public health services), the public sector equality duty, safeguarding of children and adults at risk, service users, smarter working, sustainability and the environment and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

## **Financial Implications**

32. The HS2 East Midlands HIF bid has received an award of £175,000 in grant funding from Homes England towards the costs of preparing the bid. Arrangements are in place to draw down this funding. The costs of designing and costing the highways improvements and an initial assessment of the undergrounding of high voltage cables also benefit from match funding from a £1.8m Department for Transport grant being administered through D2N2 LEP (delivered in two tranches of £900,000 in 2018/19 and 2019/20). As such, all costs associated with submitting the bid and associated evidence base can be met from existing budgets.
33. The key issue relates to the implications arising should the bid be successful and Nottinghamshire County Council take on responsibility for the programme as the accountable body.

## **Implications for Service Users**

34. A successful HIF bid will enable the partner authorities involved to upgrade critical local infrastructure, benefitting existing communities as well as enabling the delivery of much needed homes in the region.

## **Implications for Sustainability and the Environment**

35. A successful HIF bid will help to deliver sustainable new development as it will reduce the strain on local resources potentially created through upgrading infrastructure early. The HIF proposal links with other projects aiming to deliver the growth at Toton. These include close consideration of the environment impacts and work is due to take place imminently to develop green infrastructure proposals for Toton and Chetwynd Barracks as part of connectivity and masterplanning commissions.

## **RECOMMENDATIONS**

It is recommended that:

- 1) Authority is delegated to the Corporate Director Place and Section 151 Officer, in consultation with the Chairman of Policy Committee to submit the final version of the Housing Infrastructure Fund Business Case to Homes England.

**COUNCILLOR MRS KAY CUTTS, MBE**  
**Leader of the Council**

**For any enquiries about this report please contact:** Adrian Smith, Corporate Director Place,  
Tel: 0115 977 3680

**Constitutional Comments [SLB 25/02/2019]**

36. Policy Committee is the appropriate body to consider the content of this report.

**Financial Comments[GB 25/02/2019]**

37. The financial implications are set out in the report.

**Background Papers and Published Documents**

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

- None

**Electoral Division(s) and Member(s) Affected**

- All



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr	<input checked="" type="checkbox"/> Mrs	<input checked="" type="checkbox"/> Miss	<input checked="" type="checkbox"/> Ms	Other:
Name	DAVID RHEAD				
Organisation (if responding on behalf of an organisation)					
Address	[REDACTED]				
Postcode	[REDACTED]				
Tel. Number	[REDACTED]				
E-mail address	[REDACTED]				

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES  
  
- 2 JUL 2019

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**Responses should be limited to the Main Modifications.**

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

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MM

4

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

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Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

PLEASE SEE "REASONS FOR OBJECTION"  
ON ATTACHED SHEET

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.





## Background

According to *Aligned Core Strategies Part 1 Local Plan*, Broxtowe has:

- Policy 14 “Managing Travel Demand”
- Policy 15 “Transport Infrastructure Priorities”.

For new developments, both policies advocate shifts to travel-modes other than private car, where cycling is an important alternative mode.

In MM4, it’s anomalous that “strategic policy context” on Page 16:

- mentions Policy 15
- fails to mention Policy 14.

Developments at “Toton Strategic Location for Growth” and at Chetwynd will create thousands of homes/jobs. The East Midlands Councils’ *East Midlands HS2 Growth Strategy* also envisages “garden villages” at Stanton and at Radcliffe-on-Soar.

If the visions of Policy 14 and Policy 15 become reality, the Location for Growth will generate thousands of extra cycle-trips, not just within itself, but to/from other destinations (e.g. Stanton Garden Village, Radcliffe Garden Village, Beeston town-centre, Boots Enterprise Zone, University of Nottingham, QMC).

Despite Broxtowe’s Policy 14 & Policy 15:

- Although Item viii on Page 19 of MM4 says “Highway infrastructure must be considered”, Item viii fails to say “Cycle-way infrastructure must be considered”
- Although Item 3.28 on Page 31 says “including key roads”, Item 3.28 fails to say “including key cycle-routes”.

Item 3.34 on Page 34 of MM4 cites Broxtowe’s September 2017 *Infrastructure Delivery Plan*. But despite Broxtowe’s Policy 14 & Policy 15, the 2017 *Infrastructure Delivery Plan* fails to mention cycling, let alone any plans to deliver any cycling infrastructure.

In the particular case of the Toton Strategic Location for Growth, the *Infrastructure Delivery Plan*:

- fails to address the problem of how people will cycle safely between the Location for Growth and Beeston town-centre (by some route that avoids the tram-lines),<sup>1</sup> Boots Enterprise Zone, the University, and Queen’s Medical Centre
- fails to address the question of how to increase the capacity of NCN 67 to cope with (presumably) increased cycle-traffic volumes between the Location for Growth and Stanton
- fails to address the question of how people will cycle safely between the Location for Growth and Radcliffe.

The 2017 *Infrastructure Delivery Plan* is therefore unsound as a foundation for developments that will have to comply with *Aligned Core Strategies’* Policy 14 and Policy 15 (and is unsound as a foundation for MM4’s Item 3.34).

---

<sup>1</sup> For evidence of how dangerous tram-lines are to cyclists, Google “Roger de Klerk Croydon”, “Zhi Min Soh Edinburgh” and “John Melia tram Beeston”.



## Reason for objection

Generally, from a cycling point-of-view, MM4's **additions** haven't been thought through. There's a "reality gap".

- The vision (Item viii on Page 24) is "cycling should be made a viable option for accessing the hub from within a five-mile radius".
- The reality is that – whereas cycling infrastructure gets planned/constructed in the City of Nottingham – there's no apparent planning for cycling infrastructure in Broxtowe.

Specifically, Broxtowe's September 2017 *Infrastructure Delivery Plan*:

- fails to mention infrastructure for cycling, let alone to specify any plans to deliver any
- is therefore unsound as a foundation for new developments that will have to comply with *Aligned Core Strategies'* Policy 14 and Policy 15

Since MM4's Item 3.34 depends on the flawed *Infrastructure Delivery Plan*, the flaws in the *Infrastructure Delivery Plan* imply that MM4's Item 3.34 is also flawed.

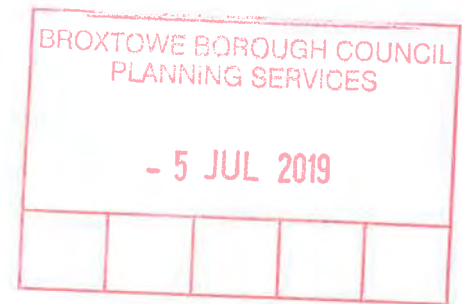
## Suggestions

I suggest the following changes to the MM4 text.

- In "strategic policy context" on Page 16, between **Policy 4** and **Policy 15**, insert **Policy 14: Managing Travel Demand**
- In Item viii on Page 19, replace **Highway infrastructure** by **Highway and cycle-way infrastructure**.
- To provide a rail-link between the Location for Growth and the proposed Radcliffe Garden Village, in Item xii on Page 24, replace **including Ilkeston Station** by **including Ilkeston Station and East Midlands Parkway**
- In Item 3.28 on Page 31, replace **key roads, landscape features ... key roads/landscape features** by **key roads, key cycle-ways, landscape features ... key roads/key cycle-ways/landscape features**
- In Item 3.33 on Page 34, replace **provide necessary capacity on the local highway network, highway improvements will be required** by **provide necessary capacity on the local highway and cycle-way network, highway and cycle-way improvements will be required**
- In Item 3.34 on Page 34, replace **"The Council has prepared an *Infrastructure Delivery Plan* that sets out the infrastructure required to support growth at this location over the plan period and beyond"** by **"Although the Council prepared an *Infrastructure Delivery Plan* in 2017 – covering some of the infrastructure required to support growth at this location over the plan period and beyond – the Council must now produce a new version, to include plans for cycling infrastructure (to provide a foundation for new developments' compliance with *Aligned Core Strategies'* Policy 14 "Managing Travel Demand" and Policy 15 "Transport Infrastructure Priorities")."**



Broxtowe Borough Council  
Planning policy  
Chief Executive's Department  
Neighbourhoods and Prosperity  
Foster Avenue  
Beeston  
Nottingham  
NG9 1AB



**BY EMAIL – [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)**

4<sup>th</sup> July 2019

Dear Sir / Madam

**RE: BROXTOWE PART 2 LOCAL PLAN – MAIN MODIFICATIONS  
OBJECTION TO MODIFICATIONS MM2 and MM4**

Spawforths have been participants within the Broxtowe Part 2 Local Plan Examination on behalf of Harworth. We appeared at the Examination in respect of Matters 2 and 7 to address employment issues and Toton Strategic Location for Growth. We have completed the Proposed Main Modifications Form and attached this letter as the explanation of our **OBJECTIONS TO MAIN MODIFICATIONS MM2 and MM4**.

**MM2 - Employment Requirements**

The Inspector's Post Hearing Advice Note dated 15<sup>th</sup> March 2019 indicated in paragraph 5 that the Core Strategy requirement "*of a minimum of 15 hectares of land for new and relocated industrial and warehousing uses will be met. However it is unclear from the wording of the LPP2 how this is to be achieved*". Main Modification 2 (MM2) in paragraph 2.9 seeks to set this out to meet the Inspectors requirements. Spawforths gave detailed evidence on the suitability of the various sources of employment supply set out in the LPP2 and we came to the conclusion that these sources of supply resulted in a shortfall of 11.9ha against the minimum industrial and warehousing requirement. No new sources have been identified but the Main Modifications (MM3 and MM4) seek to clarify the position with regard to Chetwynd Barracks and Toton. MM2 indicates that one source of industrial and warehousing supply is "*employment development as part of mixed-use development at Chetwynd Barracks (Policy 3.1)*". In fact MM3 in respect of Chetwynd Barracks sets

Spawforths



out a capacity for 1500 homes (increased from 800+); Green Infrastructure, Open Space and Sports Pitches; a new Primary School and Medical Centre; small retail / service centre; and “*small scale employment development*”. Paragraph 3.15 confirms that this is for B1 Office Use and hence this is not a relevant source of supply for industrial and warehousing uses. MM2 indicates that a further source of industrial and warehousing supply is “*the Toton Strategic Location for Growth (policy 3.2)*”. MM4 confirms that this “*will include a minimum provision of 18,000 square meters of B Class employment floor space*”. It reconfirms that this employment element is expected to be attractive to the market “*in the later years of the plan period and quite possibly beyond 2028..*”, even though in the “*Key Requirements*” element of the policy this is contradicted as it notes “*a minimum of 18,000 square meters for mixed employment (B Use Classes) to support realisation of an Innovation Campus*” is to come forward within the Plan period. MM4 therefore provides no additional confirmation that “*industrial and warehousing*” will be provided at Toton as it still refers to an “*Innovation Campus*” and also to this coming forward beyond the Plan period. Indeed under point xix of the policy, reference is made to “*iconic tall buildings*” which are clearly not appropriate forms of development for industrial and warehousing and rather reconfirm that the “*Innovation Campus*” is a B1 Office aspiration and not an industrial and warehousing scheme.

MM2 therefore provides no further justification which overcomes the shortfall in the minimum industrial and warehousing provision and hence the amendments within MM2 fail the NPPF tests of “*soundness*” in that they are not “*justified*” nor are they “*positively prepared*” as they will not meet the development needs of the Aligned Core Strategy. They are therefore “*not consistent with national policy*”.

#### **MM4 – Toton Strategic Location for Growth**

For the reasons set out above, the Toton Strategic Location for Growth policy amendments are internally inconsistent and are not justified. Harworth object to the following elements of MM4:-

- The inconsistency within the Policy of when the “*Innovation Campus*” is to be brought forward. Harworth consider that it will only come forward after the Plan period when the “*Station is operational*” and hence that the employment delivery within this site cannot be counted towards the aligned Core Strategy minimum requirements.
- The Policy should be clarified to confirm what types of uses are expected within the “*Innovation Campus*”. The Masterplan requirements set out in the policy need to be capable of being realised. Harworth consider that what is expected within the Toton Strategic Location for Growth is “*iconic tall buildings*” to benefit from the new economic outlook provided by the HS2 station. Such buildings must therefore be of a B1 (Office) nature. There is no evidence that this is a suitable location for “*industrial and warehousing*” nor that such uses are compatible with the location,

proposed mix of uses, or nature of the environment to be created. Harworth consider that the Toton site will not contribute to the minimum requirement of 15 hectares of industrial and warehousing land requirement.

Harworth also **conditionally object** to point xxii of the policy:-

- Harworth **support** the recognition that some existing uses will need to be relocated to "appropriate relocation sites" but Harworth consider that the LPP2 would be more "effective" if the wording were clarified as follows:

*"Relocate all displaced uses including the plant nursery, electricity substation, sewage works and Network Rail / DB Schenker off site subject to the viability of such proposals and appropriate relocation sites being identified and secured. Such relocation sites should meet the user requirements, for example in respect of rail connections, and should also seek to be provided in as close proximity to the current users as possible to retain the workforce and skill base within Broxtowe".*

#### **Changes to secure a "Sound" LLP**

In line with our Participant Statements to Matters 2 and 7 we consider that the minimum industrial and warehousing shortfall required by the Aligned Core Strategy should be made up through new site allocations. We recognise that the need for new allocations would have to be requested by the Inspectors in their final conclusions. We also recognise that the Council would then need to consider suitable sites against the LPP2 policies and a Sustainability Assessment and put forward further Modifications with regard to the chosen site(s). We consider that this process is necessary in order to address the current "soundness" issues.

This process is particularly important to ensure that the displaced rail related uses set out within the Toton Strategic Location for Growth (MM4) can be relocated. A "candidate" site to meet this requirement is that which is owned by Harworth at Bennerley. The Council's Local Plan Actions (M2A2, 3, 5 and 6) indicate that the Bennerley site has been the subject of Sustainability Appraisal, although I have raised my reservations about their conclusions. Since however it has been the subject of Sustainability Appraisal, this site can be considered by the Inspector as a suitable site allocation to overcome these concerns of "soundness".

If the Inspector considers that such a further round of modifications cannot be justified then it is recommended that the Inspector specifically requests a further change to the LPP2 to insert a



**requirement for an early review** of the Broxtowe LPP to address the employment land shortfall and to address the Toton displaced user requirements.

### **Conclusion**

The LPP2 does not achieve a minimum of 15 ha of industrial and warehousing land and as the requirement is a minimum, then the shortfall should be made up through new allocations as part of a further round of analysis by the Council and through a further set of Main Modifications. "Candidate" sites should be reassessed in this current context including the need to meet the displaced uses from the Toton Strategic Location for Growth. Harworth's site at Bennerley should be assessed in detail to overcome these "soundness" issues. Alternatively it is recommended that the Inspector specifically requests a further change to insert a **requirement for an early review** of the Broxtowe LPP to address the employment land shortfall and to address the Toton displaced user requirements.

Please do not hesitate to contact me should you require any clarification.

Yours faithfully

David Rolinson

Chairman

BA (Hons), DiP PEL, MRTPI

Encs:

File Ref: P0-TP-SPA-LT-P4238-0002-A

# Part 2 Local Plan Main Modifications Consultation Response Form



Agent (if applicable)

Please provide your client's name **HARWORTH**

## Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	<b>ROLINSON</b>
Organisation (if responding on behalf of an organisation)	<b>SPAWFORTH'S</b>
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]	

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

2

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

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4. Reason for SUPPORT or OBJECTION:

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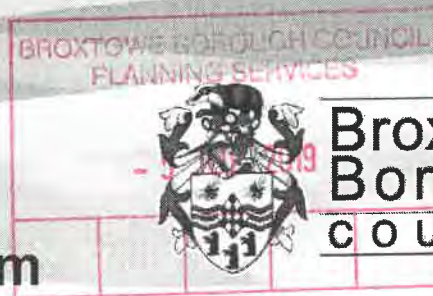
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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]	

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an online response form please visit:

**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.  
**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

4

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☒

It is not positively prepared e.g. strategy will not meet development needs

☒

It is not effective i.e. it won't work

☒

It isn't consistent with national policy

☒

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

see attached letter

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

Broxtowe Borough Council  
Planning policy  
Chief Executive's Department  
Neighbourhoods and Prosperity  
Foster Avenue  
Beeston  
Nottingham  
NG9 1AB

**BY EMAIL – [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)**

4<sup>th</sup> July 2019

Dear Sir / Madam

**RE: BROXTOWE PART 2 LOCAL PLAN – MAIN MODIFICATIONS  
OBJECTION TO MODIFICATIONS MM2 and MM4**

Spawforths have been participants within the Broxtowe Part 2 Local Plan Examination on behalf of Harworth. We appeared at the Examination in respect of Matters 2 and 7 to address employment issues and Toton Strategic Location for Growth. We have completed the Proposed Main Modifications Form and attached this letter as the explanation of our **OBJECTIONS TO MAIN MODIFICATIONS MM2 and MM4**.

**MM2 - Employment Requirements**

The Inspector's Post Hearing Advice Note dated 15<sup>th</sup> March 2019 indicated in paragraph 5 that the Core Strategy requirement "*of a minimum of 15 hectares of land for new and relocated industrial and warehousing uses will be met. However it is unclear from the wording of the LPP2 how this is to be achieved*". Main Modification 2 (MM2) in paragraph 2.9 seeks to set this out to meet the Inspectors requirements. Spawforths gave detailed evidence on the suitability of the various sources of employment supply set out in the LPP2 and we came to the conclusion that these sources of supply resulted in a shortfall of 11.9ha against the minimum industrial and warehousing requirement. No new sources have been identified but the Main Modifications (MM3 and MM4) seek to clarify the position with regard to Chetwynd Barracks and Toton. MM2 indicates that one source of industrial and warehousing supply is "*employment development as part of mixed-use development at Chetwynd Barracks (Policy 3.1)*". In fact MM3 in respect of Chetwynd Barracks sets

Spawforths

out a capacity for 1500 homes (increased from 800+); Green Infrastructure, Open Space and Sports Pitches; a new Primary School and Medical Centre; small retail / service centre; and “small scale employment development”. Paragraph 3.15 confirms that this is for B1 Office Use and hence this is not a relevant source of supply for industrial and warehousing uses. MM2 indicates that a further source of industrial and warehousing supply is “the Toton Strategic Location for Growth (policy 3.2)”. MM4 confirms that this “will include a minimum provision of 18,000 square meters of B Class employment floor space”. It reconfirms that this employment element is expected to be attractive to the market “in the later years of the plan period and quite possibly beyond 2028..”, even though in the “Key Requirements” element of the policy this is contradicted as it notes “a minimum of 18,000 square meters for mixed employment (B Use Classes) to support realisation of an Innovation Campus” is to come forward within the Plan period. MM4 therefore provides no additional confirmation that “industrial and warehousing” will be provided at Toton as it still refers to an “Innovation Campus” and also to this coming forward beyond the Plan period. Indeed under point xix of the policy, reference is made to “iconic tall buildings” which are clearly not appropriate forms of development for industrial and warehousing and rather reconfirm that the “Innovation Campus” is a B1 Office aspiration and not an industrial and warehousing scheme.

MM2 therefore provides no further justification which overcomes the shortfall in the minimum industrial and warehousing provision and hence the amendments within MM2 fail the NPPF tests of “soundness” in that they are not “justified” nor are they “positively prepared” as they will not meet the development needs of the Aligned Core Strategy. They are therefore “not consistent with national policy”.

#### **MM4 – Toton Strategic Location for Growth**

For the reasons set out above, the Toton Strategic Location for Growth policy amendments are internally inconsistent and are not justified. Harworth object to the following elements of MM4:-

- The inconsistency within the Policy of when the “Innovation Campus” is to be brought forward. Harworth consider that it will only come forward after the Plan period when the “Station is operational” and hence that the employment delivery within this site cannot be counted towards the aligned Core Strategy minimum requirements.
- The Policy should be clarified to confirm what types of uses are expected within the “Innovation Campus”. The Masterplan requirements set out in the policy need to be capable of being realised. Harworth consider that what is expected within the Toton Strategic Location for Growth is “iconic tall buildings” to benefit from the new economic outlook provided by the HS2 station. Such buildings must therefore be of a B1 (Office) nature. There is no evidence that this is a suitable location for “industrial and warehousing” nor that such uses are compatible with the location,

proposed mix of uses, or nature of the environment to be created. Harworth consider that the Toton site will not contribute to the minimum requirement of 15 hectares of industrial and warehousing land requirement.

Harworth also **conditionally object** to point xxii of the policy:-

- Harworth **support** the recognition that some existing uses will need to be relocated to "appropriate relocation sites" but Harworth consider that the LPP2 would be more "effective" if the wording were clarified as follows:

*"Relocate all displaced uses including the plant nursery, electricity substation, sewage works and Network Rail / DB Schenker off site subject to the viability of such proposals and appropriate relocation sites being identified and secured. Such relocation sites should meet the user requirements, for example in respect of rail connections, and should also seek to be provided in as close proximity to the current users as possible to retain the workforce and skill base within Broxtowe".*

#### **Changes to secure a "Sound" LLP**

In line with our Participant Statements to Matters 2 and 7 we consider that the minimum industrial and warehousing shortfall required by the Aligned Core Strategy should be made up through new site allocations. We recognise that the need for new allocations would have to be requested by the Inspectors in their final conclusions. We also recognise that the Council would then need to consider suitable sites against the LPP2 policies and a Sustainability Assessment and put forward further Modifications with regard to the chosen site(s). We consider that this process is necessary in order to address the current "soundness" issues.

This process is particularly important to ensure that the displaced rail related uses set out within the Toton Strategic Location for Growth (MM4) can be relocated. A "candidate" site to meet this requirement is that which is owned by Harworth at Bennerley. The Council's Local Plan Actions (M2A2, 3, 5 and 6) indicate that the Bennerley site has been the subject of Sustainability Appraisal, although I have raised my reservations about their conclusions. Since however it has been the subject of Sustainability Appraisal, this site can be considered by the Inspector as a suitable site allocation to overcome these concerns of "soundness".

If the Inspector considers that such a further round of modifications cannot be justified then it is recommended that the Inspector specifically requests a further change to the LPP2 to insert a

**requirement for an early review** of the Broxtowe LPP to address the employment land shortfall and to address the Toton displaced user requirements.

### **Conclusion**

The LPP2 does not achieve a minimum of 15 ha of industrial and warehousing land and as the requirement is a minimum, then the shortfall should be made up through new allocations as part of a further round of analysis by the Council and through a further set of Main Modifications. "Candidate" sites should be reassessed in this current context including the need to meet the displaced uses from the Toton Strategic Location for Growth. Harworth's site at Bennerley should be assessed in detail to overcome these "soundness" issues. Alternatively it is recommended that the Inspector specifically requests a further change to insert a **requirement for an early review** of the Broxtowe LPP to address the employment land shortfall and to address the Toton displaced user requirements.

Please do not hesitate to contact me should you require any clarification.

Yours faithfully,

David Rolinson

Chairman

BA (Hons), DiP PEL, MRTPI

Encs:

File Ref: P0-TP-SPA-LT-P4238-0002-A

**Genway, Tom**

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**From:** Steve Beard [REDACTED]  
**Sent:** 02 July 2019 11:07  
**To:** Policy  
**Subject:** Main Modifications consultation

Morning

Thank you for consulting Sport England.

We have supported the changes to policies MM3 and MM5.

We would take the opportunity to advise

1. We would be happy to be involved in the Toton Master planning process with particular reference to sports facilities and Active design and the wider active Environments generally.

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.

We would encourage you to embrace the concept of 'Active design': Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of major new housing and mixed use development schemes has a vital role in providing easy access to a choice of opportunities for sport and physical activity, making new communities more active and healthy. Active Design is aimed at urban designers, master planners and the architects of our new communities. The guidance promotes sport and activity through three key Active Design principles of - improving accessibility, enhancing amenity and increasing awareness (see link below for more information)

The document can be downloaded via the following link:

<http://www.sportengland.org/activedesign>

2. We would also be happy to be involved in the process for developing proposals to redevelop Bramcote Leisure centre – we are aware in this regard that the Broxtowe Indoor Sports facilities Strategy which was developed in 2014. It is not clear if the strategy covers the latest leisure centre options.
3. In addition the playing Pitch strategy was developed in 2016 without as far as we are aware any update/review. You maybe aware that Sport England has developed the new development pitch demand calculator. Which is designed to provide evidence of the demand for sports pitches generated by new development. The calculator is located on our website under Active places.

[www.activeplacespower.com](http://www.activeplacespower.com)

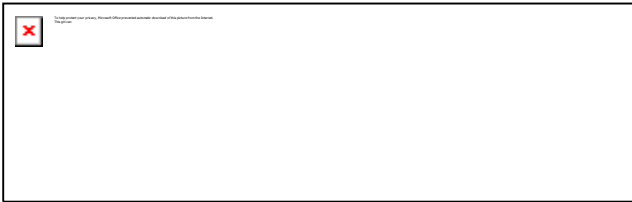
you would need to register on APP so once you log in a link to the calculator should be under the 'Reports' section.

Please contact me if you need further information.

Regards Steve

**Steve Beard**  
Planning Manager





2

# Broxtowe Borough Local Plan Part 2 Main Modifications

Land at Chilwell Lane,  
Bramcote

Prepared by Fisher German LLP on Behalf of  
Taylor Wimpey Strategic Land



**Project Title:**

Land at Chilwell Lane, Bramcote

**Address:**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Document Author	Version	Date	Approved by	Comments
Angela Smedley MRTPI	A	28/06/19	LAS	

# 01 Introduction

- 1.1 These representations are prepared by Fisher German on behalf of Taylor Wimpey Strategic Land, in respect of their land interests at Chilwell Lane, Bramcote.

# 02 Main Modifications

## **MM4 Policy 3.2:**

### **Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)**

- 2.1 We object to the modification proposed with regards to the increase in delivery within the plan period. The modification is not considered to be justified or effective.
- 2.2 Development at Toton as a Strategic Location for Growth is in accordance with the Aligned Core Strategy. There are clear ambitions for this area and its immediate vicinity, however it is unlikely that these will be realised during the plan period. The amendment to the housing figure expressed as a range (with upper limit being 800) is not considered sound or effective.
- 2.3 An outline planning application for a maximum of 500 dwellings and associated development, was submitted in October 2012 (ref: 12/00585/OUT). It was approved in July 2016.
- 2.4 An application to vary Condition 20 of the outline permission was submitted in March 2017 (ref: 17/00131/ROC) and approved in June 2017. Condition 20 restriction occupation of any dwellings or buildings until works to the M1 J25 and A52 Bardills junction had been implemented and fully operational. The variation sought to remove reference to the M1 J25 works and sought to amend the trigger for implementation of the A52 Bardills junction works to prior to the occupation of the 200<sup>th</sup> dwelling.
- 2.5 A reserved matters application for 282 dwellings was submitted in July 2017 (ref: 17/00499/REM) to the north, and approved in February 2018. No other such reserved matters application have been submitted as yet, nor any further outline of full applications.

- 2.6 Peveril Homes have discharged a number of conditions on the reserved matters site. The remainder of the site with outline planning permission is currently being marketed for sale by JLL.
- 2.7 Partial works to the A52 Bardills junction have taken place though further works in line with the outline permission yet to be undertaken.
- 2.8 The 2017/18 SHLAA and Housing Trajectory (Table 5 of the Plan), sets out that 350 dwellings are projected to be delivered at the Toton Lane site between 2018-2023, and are included in the Borough Council's five year housing land supply calculation. The trajectory sets out that delivery will commence in 2019/2020, this year, with 50 units.
- 2.9 No start on the Peveril Homes site has been made to date. Whilst some conditions have been discharged by the developer, others remain outstanding. The site is not on Peveril Homes' website as 'Coming Soon' akin to other new developments and upon contacting Peveril Homes, they have advised the development is on hold. As such delivery of the development within the projected timeframes, or indeed within the plan period, is highly questionable.
- 2.10 Furthermore, the Peveril Homes development is just 282 of the 800 dwellings earmarked for delivery in the plan period. The development is also restricted by Condition 20 of the outline permission, requiring completed works to the A52 Bardills junction prior to occupation of the 200<sup>th</sup> dwellings. Again, these works are yet to be completed. With the trajectory already slipping for the 350 dwellings projected during the five year period, it is highly likely that the LPA will not be in a position to demonstrate a five year supply of housing upon adoption of the Part 2 Plan.
- 2.11 It has been seven years since the outline planning application was made and yet no houses have been constructed. A start hasn't even been made on the reserved matters (northern parcel) as yet. The southern parcel with outline permission (for the remaining 218 dwellings) is being marketed and thus no reserved matters or full application is forthcoming at this stage.
- 2.12 The additional 300 dwellings to the site allocation, sought through MM4, are furthermore unlikely to be realised in the plan period. Should an outline application be forthcoming even later this year, 2019, anticipating a determination period akin to the initial outline consent of four years, it would not be until 2023 until approval is secured. With a further year before a reserved matters application is submitted (2024) and then determined (2025), there will only be three years left in

the plan period. Conditions will need to be discharged (2026) before a start could be made on site, with delivery at its earliest in 2027/28; the last year of the plan period.

- 2.13 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites will be required to fulfill this requirement.

### **MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

- 2.14 We object to the modification proposed with regards to the increase in capacity of the site. The modification is not considered to be justified or effective.
- 2.15 The amendment seeks an increase to the site allocation from 300 to 500 dwellings. This is not considered sound or effective.
- 2.16 A large proportion of the site is a Local Wildlife Site. Policy 3.3 sets out a number of Key Development Requirements (KDR). KDR 3. b) requires the development to *"Ensure that any loss of the Local Wildlife Site land is mitigated/compensated at equivalent quality within close proximity to its current location."*
- 2.17 Whilst the site size has increased (marginally) through the proposed modification, it is not considered sufficient to accommodate a further 200 dwellings, nor enough to provide adequate mitigation to the loss of the Wildlife Site.
- 2.18 Nottingham Wildlife Trust (NWT) objected to the allocation of 300 dwellings at the site if the entire site was to be developed and the LWS would be lost. Should the LWS be lost, the policy is considered unsound as it is not consistent with local (Policy 17 of ACS) and national policy (NPPF para 118).
- 2.19 NWT sought a modification to the policy that the LWS should not be developed or it should be removed from LWS from the allocation boundary. It is not considered that the proposed modification goes far enough to seek retention of the LWS or removal from the housing allocation. The proposed modification, noted above, seeks that any loss of the LWS will be mitigated/compensated, however NWT are of the view that protection of the sites themselves are

of the upmost importance. Furthermore, the proposed modification worsens the scenario as the quantum of development has increased 66.7%.

- 2.20 The 2017/18 SHLAA and Housing Trajectory (Table 5 of the Plan), sets out that 300 dwellings are projected to be delivered at the Bramcote site between 2018-2023, and are included in the Borough Council's five year housing land supply calculation. The trajectory sets out that delivery will commence in 2020/2021, with 100 units. Delivery of the development within the projected timeframes, or indeed within the plan period, is highly questionable. No planning application has been submitted at this stage. Should an outline application be forthcoming even later this year, 2019, and anticipating a short determination period of one year (2020), followed by reserved matters (2021) and condition discharge (2022), it is unlikely that delivery would occur before 2023/24.
- 2.21 Given the trajectory slippage, it is highly likely that the LPA will not be in a position to demonstrate a five year supply of housing upon adoption of the Part 2 Plan.
- 2.22 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites will be required to fulfill this requirement.

### **MM19 Table 5 : Housing Trajectory**

- 2.23 We object to the modifications proposed in the Housing Trajectory. As set out in our response to MM4 and MM5 it is considered that the projected delivery of a number of developments are highly questionable. The modification is not considered to be justified or effective.
- 2.24 Broxtowe Borough Council is already significantly underperforming in housing delivery. The Housing Delivery Test (2018) confirmed that for each of the past three years that the number of homes required was not met, with a cumulative shortfall over just the three years of 340 dwellings; resulting in a 67% delivery. The Housing Trajectory illustrates the shortfall across the past 7 seven years as being 856 dwellings.
- 2.25 Paragraph 75 of the NPPF (2019) states that to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the HDT



indicates that delivery has fallen below 95% of the LPAs housing requirement over the previous three years, the authority should prepare an action plan in line with national guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.

- 2.26 As delivery has fallen below 85% the requirement, a 20% buffer will be applied to the Council's five-year land supply (NPPF paragraph 73). The presumption in favour of sustainable development is engaged in scenarios where delivery has been less than 75% (as of 2020, currently 25%). If the LPA does not significantly increase its delivery it will be in this position in November 2020. The Housing Trajectory for 2018/19 continues to anticipate its undersupply, with delivery of just 293 dwellings against the annual requirement of 430, thereby increasing the cumulative shortfall to 993 dwellings.
- 2.27 The following year (2019/20), the Housing Trajectory anticipates that it will deliver a surplus to its annual target (430 units), delivering 507 units. However, as discussed in our response to MM4, it is considered that none of the anticipated units from the HS2 Toton site will be realised in the monitoring year. This reduces the anticipated 507 unit supply to 457 units (just 27 over the annual requirement). It is also likely that the projected delivery in the MBA HLAA sites (as increased by the MM) will not deliver as anticipated; thereby continuing the undersupply trend.
- 2.28 In the following year (2020/21), the Housing Trajectory anticipates that the Council will deliver a large surplus to its annual target of 430 dwellings, delivering 1069 units. However, as discussed in our response to MM4 and MM5, it is considered that none of the anticipated units from the HS2 Toton site will be realised in either monitoring year, nor for the Bramcote site. This reduces the anticipated 1069 unit supply by 250 units, to 819 units. This knock-on effect will continue through the trajectory, and the LPA will still not be able to demonstrate a five year housing land supply.
- 2.29 The only way to rectify this issue is to identify and allocate additional housing sites, especially small and medium scale sites that can be brought forward quickly and will assist the LPA in meeting its immediate housing needs. Land at Chilwell Lane, Bramcote is a suitable site for housing development. The site was included in the 2017/18 SHLAA (reference 412) which assessed the site as being suitable if policy relating to Green Belt was changed. The site is contained by development on three of its sides, with only the west being open, agricultural fields. Measuring approximately 3.7 ha the site is capable of delivering 74 dwellings.

- 2.30 When assessed in the Site Allocations issues and Options document (2013) the assessment confirmed that the site could be developed for residential development without strategically affecting the purpose of the Green Belt. The recent development of St John's College to the east further reduces any contribution of the site to Green Belt.
- 2.31 The site lies adjacent to the Main Built-up Area of Nottingham (MBA), has strong public transport links, including bus and tram services, is located within walking distance of numerous services and facilities including a shopping parade, it has no site constraints (other than the Green Belt designation) and can be brought forward for development immediately with delivery of the site contributing to the next five years of the Plan period.
- 2.32 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites are required to fulfill this requirement. It is considered that development sites should be identified and allocated through the Local Plan to ensure that the housing requirement for the plan period will be delivered.

# Details

Agent (if applicable)

Please provide your client's name	Taylor Wimpey Strategic Land
-----------------------------------	------------------------------

Your details

Title	Ms
Name	Angela Smedley
Organisation	Fisher German LLP
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	MM4 Policy 3.2: Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No

<p><b>Reasons for Support or Objection</b></p>	<p>2.1 We object to the modification proposed with regards to the increase in delivery within the plan period. The modification is not considered to be justified or effective.</p> <p>2.2 Development at Toton as a Strategic Location for Growth is in accordance with the Aligned Core Strategy. There are clear ambitions for this area and its immediate vicinity, however it is unlikely that these will be realised during the plan period. The amendment to the housing figure expressed as a range (with upper limit being 800) is not considered sound or effective.</p> <p>2.3 An outline planning application for a maximum of 500 dwellings and associated development, was submitted in October 2012 (ref: 12/00585/OUT). It was approved in July 2016.</p> <p>2.4 An application to vary Condition 20 of the outline permission was submitted in March 2017 (ref: 17/00131/ROC) and approved in June 2017. Condition 20 restriction occupation of any dwellings or buildings until works to the M1 J25 and A52 Bardills junction had been implemented and fully operational. The variation sought to remove reference to the M1 J25 works and sought to amend the trigger for implementation of the A52 Bardills junction works to prior to the occupation of the 200th dwelling.</p> <p>2.5 A reserved matters application for 282 dwellings was submitted in July 2017 (ref: 17/00499/REM) to the north, and approved in February 2018. No other such reserved matters application have been submitted as yet, nor any further outline of full applications.</p> <p>2.6 Peveril Homes have discharged a number of conditions on the reserved matters site. The remainder of the site with outline planning permission is currently being marketed for sale by JLL.</p> <p>2.7 Partial works to the A52 Bardills junction have taken place though further works in line with the outline permission yet to be undertaken.</p> <p>2.8 The 2017/18 SHLAA and Housing Trajectory (Table 5 of the Plan), sets out that 350 dwellings are projected to be delivered at the Toton Lane site between 2018-2023, and are included in the Borough Council's five year housing land supply calculation. The trajectory sets out that delivery will commence in 2019/2020, this year, with 50 units.</p> <p>2.9 No start on the Peveril Homes site has been made to date. Whilst some conditions have been discharged by the developer, others remain outstanding. The site is not on Peveril Homes' website as 'Coming Soon' akin to other new developments and upon contacting Peveril Homes, they have advised the development is on hold. As such delivery of the development within the projected timeframes, or indeed within the plan period, is highly questionable.</p> <p>2.10 Furthermore, the Peveril Homes development is just 282 of the 800 dwellings earmarked for delivery in the plan period. The development is also restricted by Condition 20 of the outline permission, requiring completed works to the A52 Bardills junction prior to occupation of the 200th dwellings. Again, these works are yet to be completed. With the trajectory already slipping for the 350 dwellings projected during the five year period, it is highly likely that the LPA will not be in a position to demonstrate a five year supply of housing upon adoption of the Part 2 Plan.</p> <p>2.11 It has been seven years since the outline planning application was made and yet no houses have been constructed. A start hasn't even been made on the reserved matters (northern parcel) as yet. The southern parcel with outline permission (for the remaining 218 dwellings) is being marketed and thus no reserved matters or full application is forthcoming at this stage.</p> <p>2.12 The additional 300 dwellings to the site allocation, sought through MM4, are furthermore unlikely to be realised in the plan period. Should an outline application be forthcoming even later this year, 2019, anticipating a determination period akin to the initial outline consent of four years, it would not be until 2023 until approval is secured. With a further year before a reserved matters application is submitted (2024) and then determined (2025), there will only be three years left in the plan period. Conditions will need to be discharged (2026) before a start could be made on site, with delivery at its earliest in 2027/28; the last year of the plan period.</p> <p>2.13 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites will be required to fulfill this requirement.</p>
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# Main Modifications 5

Broxtowe Local Plan Examination in Public  
Response to the Main Modifications to Part 2 of the Local Plan

Made on Behalf of White Hills Park Federation Trust

MM5- Policy 3.3- Bramcote (East of Coventry Lane)

This Statement is made on behalf of the White Hills Park Federation Trust ('our Client'), in response to the Main Modifications proposed to Part 2 of the Broxtowe Local Plan as part of the Examination in Public process which are currently being consulted upon. Main Modifications to a plan are usually proposed when an Inspector finds that a plan is unsound or legally non-compliant as submitted but can be made sound by modifications. The modifications relate directly to the reason why the Inspector has found the plan unsound.

In the case of the Broxtowe Part 2 Local Plan, the Inspector has asked that the consultation be carried out to make any changes which may be necessary to make the plan sound and legally compliant.

White Hills Federation Trust have land interests at Bramcote College, east of Coventry Lane. The site is located north of the A52 and is bound to the north by a railway line. The site is greenfield and is a former playing field associated with the adjacent school which has been unused for many years.

The site had previously had an allocation proposed in earlier iterations of the plan for 300 dwellings. Further to representations by both the White Hills Park Federation Trust and the Hillside Gospel Hall Trust there have been some amendments to Policy 3.3 which deal specifically with our Clients land interests.

Our Client has made representations throughout the local plan process as well the Bramcote Neighbourhood Plan. Our Client had also undertaken pre-application discussions to assist in the delivery of a replacement school on land currently occupied by Bramcotes College with both Broxtowe Borough Council and Nottinghamshire County Council on their retained land which also forms part of the allocation.

The most significant change is there has been an increase in the proposed allocation from 300 to 500 dwellings on the site. There has been an increase in the size of the site from 16.6 hectares to 18.9 hectares. This increase in size includes the Gospel Hall Trust as part of the allocation. There has also been an increase in the number of dwellings from 300 to 500 homes.

Our Client supports this change and considers that it ensures that development is less piecemeal and will also help to ensure that development of the site and wider area is more comprehensive.

Further changes to the policy include the following items.

#### Connections and Highways

- Policy 3.3(2b) The inclusion of cycle routes linking to the west of Coventry Lane and the Erewash Valley Trail- Our Client has no objection to the inclusion of a cycle route connecting the site to the west of Coventry Lane and the Erewash Valley Trail which runs alongside Coventry Lane. It is also noted that Main Modifications also introduce the same policy to the allocation to the west (Policy 3.4).
- Policy 3.3(2d) Single junction serving the site- Our Client has no objection to the policy statement which seeks to ensure that the site and the land to the west of Coventry Lane are accessed via a single junction. It is also noted that Main Modifications also introduce the same policy to the allocation to the west (Policy 3.4) and that this will require the different sets of landowners to work together to achieve a satisfactory outcome.

## Green Infrastructure and Sports Pitches

- Policy 3.3(3b) Mitigation for the loss of a wildlife site- Our Client has no objection to the inclusion of this policy as it is in line with the National Planning Policy Framework and which seeks to ensure any mitigation is in close proximity to its current location.
- Policy 3.3(3c)- Prejudice other sites- Our Client supports the policy which ensures that the development of the site does not prejudice the existing facilities at Bramcote School or Leisure Centre.

## Heritage

- Policy 3.3(5a) Update of Map- Our Client has no objection to the proposal to ensure that the stability of the sandstone is not compromised when vegetation is removed.

## Key Development Aspirations

- Sustainable Transport Measures- Our Client has no objection to the aspiration to reduce the reliance on the private car and that any proposals which have a severe impact on the highways network should be mitigated against.

In terms of the policy justification text, our Client welcomes the recognition that a bus route is a realistic possibility in the future due to the amount of development planned to come forward (Paragraph 3.40).

Our Client has no objection to paragraph 3.41 which clarifies that the Local Wildlife Site was reviewed by Nottinghamshire Biological Records Centre who have determined that the area of qualifying interest is restricted to only 0.7ha of the site.

Our Client also has no objection to the inclusion of paragraph 3.45 which clarifies that the County Council will not delay the investment in new schools whilst waiting for receipts from property sales but will fund development and then be reimbursed at a later stage from receipts from the development of the residential allocation.

## Green Belt

Our Client supports paragraph 3.44 which confirms that land at the Bramcote School and Leisure Centre is to be removed from the Green Belt. The site plays no purpose in the Green Belt and does not meet the tests outlined in the NPPF to be included. The removal of this designation will enable provide flexibility on site and our Client wholeheartedly supports the site's removal from the Green Belt.

## Conclusion

These representations have been prepared on behalf of the White Hills Park Federation Trust and set out their comments in relation to the Broxtowe Borough Council Part 2 Local Plan Main Modifications.

Our Client has land interests at land to the east of Coventry Lane which is allocated under policy 3.3 of the plan- Bramcote (East of Coventry Lane). Our Client has a keen interest in the development of the site and is committed to ensuring that the Local Plan Part 2 is prepared on a sound and robust basis which meets the tests of paragraph 35 of the Framework. It has been demonstrated throughout both the Core Strategy and Local Plan Part 2 preparation that their land interests are suitable, available and achievable and is a deliverable site.

Our Client supports the changes proposed by the Main Modifications to the policy, confirmation that the Modifications continue to support the site's removal from the Green Belt and the continued allocation of the site for residential development. Our Client supports the proposed modification which seeks to increase the capacity of the site to 500 dwellings. Our Client supports the statement which seeks to ensure that only one junction is required to access the site via Coventry Lane.

Our client supports the inclusion of mitigation measures for the loss of the wildlife site and in particular the statement which sets out that the qualifying area of the wildlife site only measures 0.7 hectares and



that the County Council will not delay investing in new schools whilst waiting for receipt of property funds.

We consider that upon acceptance of the proposed changes, the plan is sound and legally compliant.

Although further hearing sessions are not usually held at this stage, if the Inspector considers them essential to deal with any of the issues raised by the representations, Barton Willmore, on behalf of Tej Properties reserve the right to attend.

We trust that these representations will be taken into consideration going forward. If you require any further information or have any queries in connection with the site, please do not hesitate to contact us.

# Part 2 Local Plan Main Modifications Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name	WHITE HILLS PARK FEDERATION TRUST
-----------------------------------	-----------------------------------

## Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	MUSA CHOUDHARY
Organisation (if responding on behalf of an organisation)	BARTON WILLMORE
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

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**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

5

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

PLEASE SEE ATTACHED DOCUMENT

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Councillor
Name	Steve Carr
Organisation	Nottinghamshire County Council
Address	[REDACTED]
Post code	[REDACTED]
Tel. Number	
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	Policy 3.3
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>3.39 1a Object to the increase to 500 homes.</p> <p>2b Removal of provision for a safe pedestrian link from the homes to the school will add to traffic congestion and is in direct conflict with Key Development Aspiration 1.</p> <p>3b The words "mitigated/compensated" are in direct contradiction with Broxtowe Borough Council's Green Infrastructure Strategy which call for enhancement.</p> <p>4 There is no provision for primary school places. The current schools would not be able to take children from 740 homes.</p>

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Hayley Gosling
Organisation	Resident
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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## Questions

Which Main Modification does this response relate to?	MM5 Policy 3.3: Bramcote (east of Coventry Lane)
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>This objection relates to the increase of houses from 300 to 500 for the land east of Coventry Lane. Within the consultation and modifications it does not appear to take account of the potential requirement for an increase in the number of primary school places which may be needed as a result of this new housing development. Will a new primary, as well as secondary school be built? If so, where? How will this effect the catchment areas of the local schools? What is the timeframe for the build of the new housing development and school redevelopment?</p> <p>Furthermore, going forward how will Nottinghamshire County Council ensure equality and fairness within their school admission policy for children with siblings who may be effected i.e. not get a school place at their sister or brothers school because the new housing development falls within catchment of their primary school. As a result, effectively reducing the number of out of catchment school allocations.</p>

**Genway, Tom**

---

**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awsworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new

builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



Nottinghamshire Wildlife Trust is the county's largest environmental charity - run by local people for the benefit of local wildlife. We manage nature reserves across the county, champion nature and inspire adults and children about the natural world. Together we are working to create a Living Landscape for Nottinghamshire.

**Are you a member of Nottinghamshire Wildlife Trust?**

**Join us now online** [REDACTED]

To find out how we use and protect your personal data, please see our Privacy Policy on our website at [www.nottinghamshirewildlife.org](http://www.nottinghamshirewildlife.org)

Registered office: The Old Ragged School, Brook St, Nottingham NG1 1EA  
Registered in England & Wales: no. 748865. Charity no.224168R



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	Hillside Gospel Hall Trust
-----------------------------------	----------------------------

## Your Details

Title	Mr Mrs Miss Ms Other: Mr
Name	Guy Longley
Organisation (if responding on behalf of an organisation)	Pegasus Planning Group Ltd
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: _____	

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**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

MM5 - Policy 3.3: Bramcote (east of Coventry Lane

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

☒

Object

☐

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

Main Modification MM5 proposes a number of amendments to Policy 3.3 relating to new residential development east of Coventry Lane. The Key Development requirements are amended to refer to the provision of 500 homes rather than 300 homes.

Reference is also made to Map 11 which shows an amendment to the extent of the proposed allocation to include the Gospel Hall Trust land.

Pegasus Group made representations on behalf of the Gospel Hall Trust to the Submission Draft Plan promoting the inclusion of the Gospel Hall Trust land within the proposed housing allocation.

The proposed modification to extend the housing allocation to include the Gospel Hall Trust land is therefore supported.

The Proposed Modification refers to amendments to Map 11 but the amended reasoned justification makes reference to 'Map 12'. This inconsistency in referencing needs to be amended.

The Modification to the policy also refers to access to the allocation being from a single point of access on Coventry Road. It should be noted that access to the Gospel Hall Trust is from an existing access from Coventry Road.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

**Genway, Tom**

---

**From:** Steve Beard [REDACTED]  
**Sent:** 02 July 2019 11:07  
**To:** Policy  
**Subject:** Main Modifications consultation

Morning

Thank you for consulting Sport England.

We have supported the changes to policies MM3 and MM5.

We would take the opportunity to advise

1. We would be happy to be involved in the Toton Master planning process with particular reference to sports facilities and Active design and the wider active Environments generally.

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.

We would encourage you to embrace the concept of 'Active design': Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of major new housing and mixed use development schemes has a vital role in providing easy access to a choice of opportunities for sport and physical activity, making new communities more active and healthy. Active Design is aimed at urban designers, master planners and the architects of our new communities. The guidance promotes sport and activity through three key Active Design principles of - improving accessibility, enhancing amenity and increasing awareness (see link below for more information)

The document can be downloaded via the following link:

<http://www.sportengland.org/activedesign>

2. We would also be happy to be involved in the process for developing proposals to redevelop Bramcote Leisure centre – we are aware in this regard that the Broxtowe Indoor Sports facilities Strategy which was developed in 2014. It is not clear if the strategy covers the latest leisure centre options.
3. In addition the playing Pitch strategy was developed in 2016 without as far as we are aware any update/review. You maybe aware that Sport England has developed the new development pitch demand calculator. Which is designed to provide evidence of the demand for sports pitches generated by new development. The calculator is located on our website under Active places.

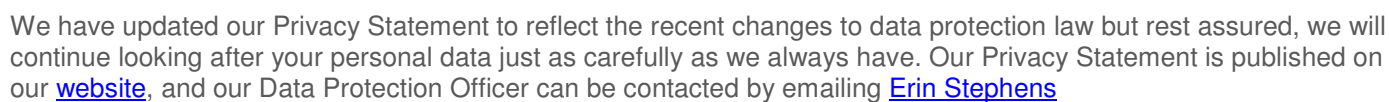
[www.activeplacespower.com](http://www.activeplacespower.com)

you would need to register on APP so once you log in a link to the calculator should be under the 'Reports' section.

Please contact me if you need further information.

Regards Steve

**Steve Beard**  
Planning Manager



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# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	steve beard
Organisation	Sport England
Address	<div></div>
Tel. Number	<div></div>
E-mail address	<div></div>

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	MM5
Do you support or object to the Main Modification?	Support

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	Protection of sports pitches

# Broxtowe Borough Local Plan Part 2 Main Modifications

Land at Chilwell Lane,  
Bramcote

Prepared by Fisher German LLP on Behalf of  
Taylor Wimpey Strategic Land

**Project Title:**

Land at Chilwell Lane, Bramcote

**Address:**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Document Author	Version	Date	Approved by	Comments
Angela Smedley MRTPI	A	28/06/19	LAS	



# 01 Introduction

- 1.1 These representations are prepared by Fisher German on behalf of Taylor Wimpey Strategic Land, in respect of their land interests at Chilwell Lane, Bramcote.

# 02 Main Modifications

## **MM4 Policy 3.2:**

### **Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)**

- 2.1 We object to the modification proposed with regards to the increase in delivery within the plan period. The modification is not considered to be justified or effective.
- 2.2 Development at Toton as a Strategic Location for Growth is in accordance with the Aligned Core Strategy. There are clear ambitions for this area and its immediate vicinity, however it is unlikely that these will be realised during the plan period. The amendment to the housing figure expressed as a range (with upper limit being 800) is not considered sound or effective.
- 2.3 An outline planning application for a maximum of 500 dwellings and associated development, was submitted in October 2012 (ref: 12/00585/OUT). It was approved in July 2016.
- 2.4 An application to vary Condition 20 of the outline permission was submitted in March 2017 (ref: 17/00131/ROC) and approved in June 2017. Condition 20 restriction occupation of any dwellings or buildings until works to the M1 J25 and A52 Bardills junction had been implemented and fully operational. The variation sought to remove reference to the M1 J25 works and sought to amend the trigger for implementation of the A52 Bardills junction works to prior to the occupation of the 200<sup>th</sup> dwelling.
- 2.5 A reserved matters application for 282 dwellings was submitted in July 2017 (ref: 17/00499/REM) to the north, and approved in February 2018. No other such reserved matters application have been submitted as yet, nor any further outline of full applications.

- 2.6 Peveril Homes have discharged a number of conditions on the reserved matters site. The remainder of the site with outline planning permission is currently being marketed for sale by JLL.
- 2.7 Partial works to the A52 Bardills junction have taken place though further works in line with the outline permission yet to be undertaken.
- 2.8 The 2017/18 SHLAA and Housing Trajectory (Table 5 of the Plan), sets out that 350 dwellings are projected to be delivered at the Toton Lane site between 2018-2023, and are included in the Borough Council's five year housing land supply calculation. The trajectory sets out that delivery will commence in 2019/2020, this year, with 50 units.
- 2.9 No start on the Peveril Homes site has been made to date. Whilst some conditions have been discharged by the developer, others remain outstanding. The site is not on Peveril Homes' website as 'Coming Soon' akin to other new developments and upon contacting Peveril Homes, they have advised the development is on hold. As such delivery of the development within the projected timeframes, or indeed within the plan period, is highly questionable.
- 2.10 Furthermore, the Peveril Homes development is just 282 of the 800 dwellings earmarked for delivery in the plan period. The development is also restricted by Condition 20 of the outline permission, requiring completed works to the A52 Bardills junction prior to occupation of the 200<sup>th</sup> dwellings. Again, these works are yet to be completed. With the trajectory already slipping for the 350 dwellings projected during the five year period, it is highly likely that the LPA will not be in a position to demonstrate a five year supply of housing upon adoption of the Part 2 Plan.
- 2.11 It has been seven years since the outline planning application was made and yet no houses have been constructed. A start hasn't even been made on the reserved matters (northern parcel) as yet. The southern parcel with outline permission (for the remaining 218 dwellings) is being marketed and thus no reserved matters or full application is forthcoming at this stage.
- 2.12 The additional 300 dwellings to the site allocation, sought through MM4, are furthermore unlikely to be realised in the plan period. Should an outline application be forthcoming even later this year, 2019, anticipating a determination period akin to the initial outline consent of four years, it would not be until 2023 until approval is secured. With a further year before a reserved matters application is submitted (2024) and then determined (2025), there will only be three years left in

the plan period. Conditions will need to be discharged (2026) before a start could be made on site, with delivery at its earliest in 2027/28; the last year of the plan period.

- 2.13 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites will be required to fulfill this requirement.

### **MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

- 2.14 We object to the modification proposed with regards to the increase in capacity of the site. The modification is not considered to be justified or effective.
- 2.15 The amendment seeks an increase to the site allocation from 300 to 500 dwellings. This is not considered sound or effective.
- 2.16 A large proportion of the site is a Local Wildlife Site. Policy 3.3 sets out a number of Key Development Requirements (KDR). KDR 3. b) requires the development to *"Ensure that any loss of the Local Wildlife Site land is mitigated/compensated at equivalent quality within close proximity to its current location."*
- 2.17 Whilst the site size has increased (marginally) through the proposed modification, it is not considered sufficient to accommodate a further 200 dwellings, nor enough to provide adequate mitigation to the loss of the Wildlife Site.
- 2.18 Nottingham Wildlife Trust (NWT) objected to the allocation of 300 dwellings at the site if the entire site was to be developed and the LWS would be lost. Should the LWS be lost, the policy is considered unsound as it is not consistent with local (Policy 17 of ACS) and national policy (NPPF para 118).
- 2.19 NWT sought a modification to the policy that the LWS should not be developed or it should be removed from LWS from the allocation boundary. It is not considered that the proposed modification goes far enough to seek retention of the LWS or removal from the housing allocation. The proposed modification, noted above, seeks that any loss of the LWS will be mitigated/compensated, however NWT are of the view that protection of the sites themselves are

of the upmost importance. Furthermore, the proposed modification worsens the scenario as the quantum of development has increased 66.7%.

- 2.20 The 2017/18 SHLAA and Housing Trajectory (Table 5 of the Plan), sets out that 300 dwellings are projected to be delivered at the Bramcote site between 2018-2023, and are included in the Borough Council's five year housing land supply calculation. The trajectory sets out that delivery will commence in 2020/2021, with 100 units. Delivery of the development within the projected timeframes, or indeed within the plan period, is highly questionable. No planning application has been submitted at this stage. Should an outline application be forthcoming even later this year, 2019, and anticipating a short determination period of one year (2020), followed by reserved matters (2021) and condition discharge (2022), it is unlikely that delivery would occur before 2023/24.
- 2.21 Given the trajectory slippage, it is highly likely that the LPA will not be in a position to demonstrate a five year supply of housing upon adoption of the Part 2 Plan.
- 2.22 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites will be required to fulfill this requirement.

### **MM19 Table 5 : Housing Trajectory**

- 2.23 We object to the modifications proposed in the Housing Trajectory. As set out in our response to MM4 and MM5 it is considered that the projected delivery of a number of developments are highly questionable. The modification is not considered to be justified or effective.
- 2.24 Broxtowe Borough Council is already significantly underperforming in housing delivery. The Housing Delivery Test (2018) confirmed that for each of the past three years that the number of homes required was not met, with a cumulative shortfall over just the three years of 340 dwellings; resulting in a 67% delivery. The Housing Trajectory illustrates the shortfall across the past 7 seven years as being 856 dwellings.
- 2.25 Paragraph 75 of the NPPF (2019) states that to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the HDT

indicates that delivery has fallen below 95% of the LPAs housing requirement over the previous three years, the authority should prepare an action plan in line with national guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.

- 2.26 As delivery has fallen below 85% the requirement, a 20% buffer will be applied to the Council's five-year land supply (NPPF paragraph 73). The presumption in favour of sustainable development is engaged in scenarios where delivery has been less than 75% (as of 2020, currently 25%). If the LPA does not significantly increase its delivery it will be in this position in November 2020. The Housing Trajectory for 2018/19 continues to anticipate its undersupply, with delivery of just 293 dwellings against the annual requirement of 430, thereby increasing the cumulative shortfall to 993 dwellings.
- 2.27 The following year (2019/20), the Housing Trajectory anticipates that it will deliver a surplus to its annual target (430 units), delivering 507 units. However, as discussed in our response to MM4, it is considered that none of the anticipated units from the HS2 Toton site will be realised in the monitoring year. This reduces the anticipated 507 unit supply to 457 units (just 27 over the annual requirement). It is also likely that the projected delivery in the MBA HLAA sites (as increased by the MM) will not deliver as anticipated; thereby continuing the undersupply trend.
- 2.28 In the following year (2020/21), the Housing Trajectory anticipates that the Council will deliver a large surplus to its annual target of 430 dwellings, delivering 1069 units. However, as discussed in our response to MM4 and MM5, it is considered that none of the anticipated units from the HS2 Toton site will be realised in either monitoring year, nor for the Bramcote site. This reduces the anticipated 1069 unit supply by 250 units, to 819 units. This knock-on effect will continue through the trajectory, and the LPA will still not be able to demonstrate a five year housing land supply.
- 2.29 The only way to rectify this issue is to identify and allocate additional housing sites, especially small and medium scale sites that can be brought forward quickly and will assist the LPA in meeting its immediate housing needs. Land at Chilwell Lane, Bramcote is a suitable site for housing development. The site was included in the 2017/18 SHLAA (reference 412) which assessed the site as being suitable if policy relating to Green Belt was changed. The site is contained by development on three of its sides, with only the west being open, agricultural fields. Measuring approximately 3.7 ha the site is capable of delivering 74 dwellings.

- 2.30 When assessed in the Site Allocations issues and Options document (2013) the assessment confirmed that the site could be developed for residential development without strategically affecting the purpose of the Green Belt. The recent development of St John's College to the east further reduces any contribution of the site to Green Belt.
- 2.31 The site lies adjacent to the Main Built-up Area of Nottingham (MBA), has strong public transport links, including bus and tram services, is located within walking distance of numerous services and facilities including a shopping parade, it has no site constraints (other than the Green Belt designation) and can be brought forward for development immediately with delivery of the site contributing to the next five years of the Plan period.
- 2.32 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites are required to fulfill this requirement. It is considered that development sites should be identified and allocated through the Local Plan to ensure that the housing requirement for the plan period will be delivered.

# Details

Agent (if applicable)

Please provide your client's name	Taylor Wimpey Strategic Land
-----------------------------------	------------------------------

Your details

Title	Ms
Name	Angela Smedley
Organisation	Fisher German LLP
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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## Questions

Which Main Modification does this response relate to?	MM5 Policy 3.3: Bramcote (east of Coventry Lane)
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No



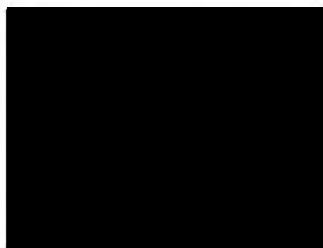
<p><b>Reasons for Support or Objection</b></p>	<p>2.14 We object to the modification proposed with regards to the increase in capacity of the site. The modification is not considered to be justified or effective.</p> <p>2.15 The amendment seeks an increase to the site allocation from 300 to 500 dwellings. This is not considered sound or effective.</p> <p>2.16 A large proportion of the site is a Local Wildlife Site. Policy 3.3 sets out a number of Key Development Requirements (KDR). KDR 3. b) requires the development to "Ensure that any loss of the Local Wildlife Site land is mitigated/compensated at equivalent quality within close proximity to its current location."</p> <p>2.17 Whilst the site size has increased (marginally) through the proposed modification, it is not considered sufficient to accommodate a further 200 dwellings, nor enough to provide adequate mitigation to the loss of the Wildlife Site.</p> <p>2.18 Nottingham Wildlife Trust (NWT) objected to the allocation of 300 dwellings at the site if the entire site was to be developed and the LWS would be lost. Should the LWS be lost, the policy is considered unsound as it is not consistent with local (Policy 17 of ACS) and national policy (NPPF para 118).</p> <p>2.19 NWT sought a modification to the policy that the LWS should not be developed or it should be removed from LWS from the allocation boundary. It is not considered that the proposed modification goes far enough to seek retention of the LWS or removal from the housing allocation. The proposed modification, noted above, seeks that any loss of the LWS will be mitigated/compensated, however NWT are of the view that protection of the sites themselves are of the utmost importance. Furthermore, the proposed modification worsens the scenario as the quantum of development has increased 66.7%.</p> <p>2.20 The 2017/18 SHLAA and Housing Trajectory (Table 5 of the Plan), sets out that 300 dwellings are projected to be delivered at the Bramcote site between 2018-2023, and are included in the Borough Council's five year housing land supply calculation. The trajectory sets out that delivery will commence in 2020/2021, with 100 units. Delivery of the development within the projected timeframes, or indeed within the plan period, is highly questionable. No planning application has been submitted at this stage. Should an outline application be forthcoming even later this year, 2019, and anticipating a short determination period of one year (2020), followed by reserved matters (2021) and condition discharge (2022), it is unlikely that delivery would occur before 2023/24.</p> <p>2.21 Given the trajectory slippage, it is highly likely that the LPA will not be in a position to demonstrate a five year supply of housing upon adoption of the Part 2 Plan.</p> <p>2.22 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites will be required to fulfill this requirement.</p>
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0115-9255785

PROXTONE BOROUGH COUNCIL  
PLANNING SERVICES

- 8 JUL 2019



4.7.2019

MM5 3.39 1 New Homes

This main modification was introduced as a result of representations by the White Hills Park Federation. Now that the White Hills Park Federation no longer has a vested interest in maximising the profit from this development there is a case for reverting to the original proposed figure of 300 dwellings. This density would be more in keeping with the existing surrounding residential area. It would also relieve the pressure on the infrastructure and traffic conditions of the area.

Yours faithfully



# Main Modifications 6

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Peter Chesney
Organisation	None
Address	
Post code	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	No
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## Questions

Which Main Modification does this response relate to?	Bramcote East of Coventry Lane
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>So, essentially the additional Bramcote housing will go ahead without any commitment to improving road infrastructure to deal with the additional traffic. I assume all that will happen is a white line will be painted on a pavement somewhere to provide a bike lane so the council can claim they've provided sustainable transport options (box ticked). Bramcote already suffers from heavy congestion along the A52 section between the leisure centre and the QMC and additional housing will only exasperate this. There must be clear commitment to proving improved bus services, particularly between Bramcote and Beeston.</p> <p>It looks like Bramcote will eventually lose the much valued leisure centre (I read 'rationalise' as 'justifying get rid of') – replaced with two "hubs" somewhere to the north and south of the Borough. Aren't there already leisure provisions to the north and south of Bramcote (Chilwell, Kimberly etc)? If not, then additional provisions should be provided there, without removing the much valued and easily accessible Bramcote leisure centre - otherwise you're essentially robbing Peter to pay Paul. What is a "leisure hub" anyway?! Why not incorporate a commitment to providing public leisure facilities at the proposed new school, equivalent to those available at the existing centre, if the leisure centre will not be replaced. The school facility should be required to include all weather pitches (astro turf) that can be used by the school and local community.</p>

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	isobel greenhalgh
Organisation	town clerk
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	Broxtowe part2 local plan main modifications - MM6
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>Stapleford Neighbourhood Plan Steering Groups Response to the Broxtowe part 2 local plan main modifications MM6</p> <p>The steering group is disappointed that the examiner agreed with Broxtowe Borough Council (BBC) over the allocation of land to the West of Coventry lane being put forward for development. This site is of great ecological significance due to its proximity to varied and valued habitats. We are therefore pleased to see that a key development requirement of providing enhanced green infrastructure corridors has been highlighted as requiring clarification as to the location of these corridors. The Nottinghamshire Biological records centre has very limited data for this site so we therefore request that a wildlife survey be carried out on the site by the Nottinghamshire wildlife trust to ascertain the areas requiring protection.</p> <p>We welcome the inclusion of cycle lanes and a new bus service to the site. We request that the Stapleford N.P. steering group be able to produce the design brief for this site to include these aspects.</p> <p>We also request that this site be put forward as a showcase for carbon neutral development. We acknowledge that many larger developers have failed to make progress towards providing carbon neutral housing but self-build and smaller developers are more likely to provide this. We therefore welcome MM28 which enforces the requirement for a more inclusive housing mix.</p>

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	cldr
Name	Teresa Needham
Organisation	Stapleford Neighbourhood plan
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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## Questions

Which Main Modification does this response relate to?	MM6
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).	
It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	Yes
It doesn't comply with the law	No
Reasons for Support or Objection	<p>I still have grave concerns regarding the impact that development of this site will have on the wider wildlife corridor network. The modification should stipulate that a wildlife survey should be carried out over the entire site by the Nottinghamshire wildlife trust prior to any plans being drawn up to inform the "enhancements" to the green infrastructure required. I would also recommend the inclusion of a requirement that the Stapleford Hill management plan is kept up to date as there is likely to be a greater number of users which will impact the site.</p> <p>If the wildlife survey finds that the site is suitable for development, the modification should include that the design brief for this site will be drawn up by the Stapleford Neighbourhood plan steering group and ensure that provision for self-build, affordable, carbon neutral housing is included. This will bring the plan into line with the governments policy to reduce carbon emissions and the 2011 localism act.</p> <p>The modification should state the destination and frequency of the new bus route as unless this service runs at least hourly and directly to Nottingham city centre and a local town centre it is unlikely to be used and cancelled after a short period of time. This new bus route should also service Stapleford North.</p>

# Main Modifications 7





# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Emma Brook
Organisation	Nottinghamshire County Council
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	MM7: Policy 3.5: Severn Trent
Do you support or object to the Main Modification?	Support

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	In relation to Main Modification 7, which relates to amendments to Policy 3.5: Severn Trent Beeston residential allocation, the Nottinghamshire County Council from a waste perspective welcomes the inclusion in the Key Development Requirements that development should be located to ensure an appropriate stand off distance between any proposed residential development and the Household Waste Recycling Centre and the Sewage Treatment Works. By including this requirement for this site allocation, this should avoid any potential conflict in land use and safeguard both Waste Management Facilities and therefore addressing policy WCS10 in the Nottinghamshire and Nottingham Waste Core Strategy (adopted 2013) and the County Councils previous objection.

**Genway, Tom**

---

**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awsworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new

builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



Nottinghamshire Wildlife Trust is the county's largest environmental charity - run by local people for the benefit of local wildlife. We manage nature reserves across the county, champion nature and inspire adults and children about the natural world. Together we are working to create a Living Landscape for Nottinghamshire.

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Registered in England & Wales: no. 748865. Charity no.224168R

# Main Modifications 8

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Richard Hill
Organisation	Mr
Address	[REDACTED]
Post code	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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## Questions

Which Main Modification does this response relate to?	MM8 - Policy 3.6 Section 2a
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	Yes
It doesn't comply with the law	No
Reasons for Support or Objection	<p>In my opinion this section could be improved as follows:</p> <p>The plan should specifically call for replacement or enhancement on the existing Dovecote Lane footbridge over the railway line as part of the Maltings redevelopment. A new bridge should preferably include ramps to facilitate use by cyclists ( the nearby road bridge is not cycle friendly). Improved cycle access to the Beeston Rylands area should be a specific objective. There should also be direct pedestrian access to the respective station platforms from both Dovecote Lane and Technology drive</p>

**Genway, Tom**

---

**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

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**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

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**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

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Retention of hedges and protection of common toads mentioned in policy wording

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Reference to wildlife corridor in policy wording

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Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



Nottinghamshire Wildlife Trust is the county's largest environmental charity - run by local people for the benefit of local wildlife. We manage nature reserves across the county, champion nature and inspire adults and children about the natural world. Together we are working to create a Living Landscape for Nottinghamshire.

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Registered office: The Old Ragged School, Brook St, Nottingham NG1 1EA  
Registered in England & Wales: no. 748865. Charity no.224168R

# Main Modifications 9



**Genway, Tom**

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**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new

builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[Redacted]  
[Redacted]



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**Join us now online** [Redacted]

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Registered office: The Old Ragged School, Brook St, Nottingham NG1 1EA  
Registered in England & Wales: no. 748865. Charity no.224168R

# Main Modifications 11

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Cheryl Ward
Organisation	Resident
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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## Questions

Which Main Modification does this response relate to?	Policy 4.1 Land west of Awsworth (inside the bypass) Key Development Aspiration; 2
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	Access from Barlow Drive North to proposed site is not acceptable due to the following reasons: 1. If Barlow Drive North were to provide limited access this would increase the traffic on Barlow Drive North which is already too narrow for the volume of traffic it already has 2. It would be used by the residents on the proposed site as a quicker way than access from the bypass, so the impact would not be limited 3. Extra traffic on Barlow Drive North would affect the road safety of existing residents and be dangerous to young children living on the road with the increase traffic 4. Extra traffic in the village would increase pollution 5. My proposal would be access from the Bypass and Newtons Lane only as Newtons Lane is wider and could cope with the additional limited amount of traffic

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Marilyn Reed
Organisation	Cossall Parish Neighbourhood Plan Steering Group
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019  
Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	MM11 Policy 4.1
Do you support or object to the Main Modification?	Support

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No

## Reasons for Support or Objection

The Steering Group of Cossall Parish Neighbourhood Plan support the modifications in MM11 Policy 4.1. for the following reasons:

They are in line with the views expressed by our residents in an extremely well supported Neighbourhood Plan questionnaire, and an equally well supported Business Survey in which residents and local businesses provided detailed comments on a range of issues, including the site referred to as 'Land West of Awsworth (inside the bypass). Up to 50 properties on the site will be built in Cossall Parish, and one of the proposed access routes to the site is Newtons Lane which is also in Cossall Parish.

The modifications we wish to comment on are closely linked.

In relation to the provision of public transport, under 'Key Development Requirements' we strongly support No.2c 'enhance bus routes adjacent to or within the site.'

Under 'Key Development Aspiration' we strongly support No. 1 'sustainable transport measures will be fully utilised to reduce reliance on the private car' and No. 4.7 'as part of the planning application it will be expected that the applicant demonstrates the development will assist in securing enhancements to the existing bus route'.

Residents throughout Cossall Parish felt strongly about the need to improve the bus service. This will become even more urgent when the 250 properties, plus an additional 65 properties on another site in Awsworth have been built. Currently the only bus that serves Cossall and Awsworth does not operate in the evenings or on Sundays. The bus service, in addition to the lack of facilities in Cossall has led to a car being perceived as essential, rather than a lifestyle choice. Careful consideration will need to be given not only to enhancing the provision of public transport, but also to its route to ensure the needs of both new and existing residents are met. A bus service does not currently run along the bypass which is where access to the site will be, but in providing one the existing route through Cossall and Awsworth will still need to be maintained. Improved public transport will be key in supporting the new development but the need for it to be well planned cannot be over stated.

Residents also expressed concern that the Primary and Nursery School in Awsworth, which is the catchment school for children living in Awsworth, Babbington and Cossall is already full in most year groups and will not be able to accommodate the additional intake of children that will arise from the new developments. Parents of primary age children moving into the area will therefore need a good bus service, or access to a car if they have to take their children to a primary school several miles away as walking will not be an option. The adequate provision of places in the local primary school is an issue that will need to be addressed.

A further concern is the vehicular access to the site, 'Key Development Aspiration No. 2.' We feel it is important to state that residents felt strongly that the access route should only be from the bypass and not via Newtons Lane. Newtons Lane is a cul-de-sac with 86 properties and there are a further 69 properties on The Glebe, a cul-de-sac off Newtons Lane. The impact of increased traffic on Newtons Lane were it to be an access route would be considerable. On-street parking already makes two-way traffic difficult at times and visibility in both directions when exiting Newtons Lane can often be problematic due to parked vehicles in both directions on the adjoining road. Residents also expressed concern that if access from the site is via Newtons Lane it will significantly increase the amount of traffic going through the residential areas of Cossall and Awsworth. The bypass was built to divert traffic away from the villages and should always be the route used. The narrow and winding road through the conservation part of Cossall which links to Trowell and Ilkeston is already used as a rat-run by drivers looking to reduce their journey time, and by heavy vehicles ignoring the weight limit. Excessive speed has also become an issue. Ensuring more traffic does not pass through the villages, rather than using the bypass must be a priority. We therefore strongly support under 'Key Development Aspirations' No 1 'where there are residual cumulative impacts on the highways network these should be mitigated to ensure that they are not severe.




Our Neighbourhood Plan is not yet complete and we have therefore been unable to engage in the Local Plan in its earlier consultation stages. Residents and local businesses have however engaged fully in our consultation process and we feel it is important that their views are heard on the issues that are relevant to the proposed modifications.

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Ms
Name	Joanne Neville
Organisation	Harworth Group PLC
Address	
Post code	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	Main Modification 11 - Land West of Awsworth (inside the bypass)
Do you support or object to the Main Modification?	Support

If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>Harworth Group PLC has an interest in land to the West of Awsworth and therefore supports the allocation and in general its main modifications. However, policy 4.1 - 3(c) at MM11 refers to the retention of hedgerows. Whilst it is our intention to seek to retain the existing planting on site this is not always possible, particularly where ground conditions and constraints prohibit this. There may need to be some hedgerow removal to facilitate the development of the site, deliver the housing numbers and achieve good design. Where there is a loss of hedgerow we would propose replacement planting. Therefore, we would suggest that Policy 4.1 part 3(c) is amended to reflect this, for example</p> <p>3(c) Retain hedgerows where possible and incorporate these into any landscaping scheme. Where features are lost they will be replaced by suitable new planting;</p>

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input checked="" type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input checked="" type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	
Postcode	
Tel. Number	
E-mail address	

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

3

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM3 - policy 3.1 Chetwynd Barracks

HE Supports the additional information in respect of designated and non-designated heritage assets.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<del>Mr</del> <del>Mrs</del> Miss <del>Ms</del> Other:
Name	ROSAMUND WORRALL
Organisation (If responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

11

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object



3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM 11 - Policy 6.1 Land west of Ainsworth

He supports the additional information in respect of Bennerley Viaduct.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr Mrs Miss <del>Me</del> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

12

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object



3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM12 - Policy S.1 East of Church Lane, Brinsley

H&E supports criteria 4 and the use of 'conserve' instead of 'preserve' in line with NPPF terminology.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input checked="" type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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Yes ☒

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

32

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM 32 - Policy 23: proposals affecting designated and non-designated heritage assets.

HE supports clarification about assessment of harm in Part 2 and the use of 'conserve' instead of 'preserve' in Part 3 all in line with NPPF requirements and terminology.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr Mrs Miss Ms Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes



Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)



1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

38

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

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It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM38- Policy 32: Develop Contributions

HE supports the inclusion of criteria 1i in respect of the historic environment, heritage assets and setting.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

**Genway, Tom**

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**From:** Jenny [REDACTED]  
**Sent:** 05 June 2019 14:57  
**To:** Policy  
**Subject:** RE: BROXTOWE PART 2 LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION

The cossall bypass and the and awsworth lane is grid locked every night imagine what will happen with more traffic say at least 500plus cars it will be horrendous.this will be a sad day .what a shame .I do understand houses need to be built, but on green belt 😊 it will destroy the area. It really shouldn't be allowed.

Sent from my Windows 10 device

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**From:** [Policy](#)  
**Sent:** 24 May 2019 10:07  
**To:** [REDACTED]  
**Subject:** BROXTOWE PART 2 LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION

Dear Sir/Madam

## **PART 2 LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION**

Broxtowe's Part 2 Local Plan was submitted for examination in August 2018. The examination process is being carried out by Helen Hockenhull who is an independent Planning Inspector. The Inspector will determine whether the Plan is 'sound' and complies with legal requirements.

You have received this letter because you have made comments on the Part 2 Local Plan at an earlier stage during its preparation, you are a consultee, or have requested to be notified. Please let us know if you no longer wish to be kept informed.

Following the completion of the public hearings, the Plan has reached the next key stage in the process. The Inspector has now asked that consultation be carried out on the Main Modifications which may be necessary to make the Plan 'sound' and / or legally compliant.

Broxtowe Borough Council is inviting your comments on the Main Modifications to the Part 2 Local Plan and these can be made between **Friday 24<sup>th</sup> May 2019** and **5pm on Tuesday 9<sup>th</sup> July 2019. Responses should be limited to the Main Modifications documents.** Details of the consultation documents and how to respond can be found overleaf, comments relating to other issues will not be considered by the Inspector.

There are also some Additional Modifications, which are minor changes to update the Local Plan and are included for information only. After the Consultation, the Inspector will consider all comments on the Main Modifications before issuing her Report on whether she considers the Local Plan sound and / or legally compliant.

If you have any queries, please do not hesitate to contact the Planning Policy team.

Yours faithfully

[REDACTED]  
Steffan Saunders  
Head of Neighbourhoods & Prosperity



**Broxtowe Borough Council Part 2 Local Plan  
Notice of public consultation on Main Modifications  
Town and Country Planning (Local Planning) (England) Regulations 2012**

The Council is seeking comments on the Main Modifications to the Broxtowe Borough Part 2 Local Plan. The Main Modifications are those that the Inspector has identified as possibly being necessary in order for the Plan to be found 'sound'. The Inspector's final conclusions will be given in her Report in due course.

Consultation on the Main Modifications and the associated Sustainability Appraisal of the Main Modifications will run from **Friday 24<sup>th</sup> May 2019 until 5pm on Tuesday 9<sup>th</sup> July 2019**. Comments must be received within this time, representations received after this date and time will not be accepted.

**At this stage representations are only being sought on whether the Main Modifications to the Plan are sound and/or legally compliant.**

**If a response was made to the previous Part 2 Local Plan consultations, there is no need to resubmit them during this representation period as the Inspector has already considered these representations during the course of the Examination.**

Representations are invited on the following documents:

- Schedule of Main Modifications;
- Main Modifications Sustainability Appraisal and Habitats Regulation Assessment update; and
- Schedule of Changes to the Policies Map.

Representations can be made:

- online via [www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)
- by email to [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)
- by post to Planning Policy, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham NG9 1AB

Documents are available for inspection on our website: [www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan) and at the following locations:

- The Council's Main Offices at: Foster Avenue, Beeston, NG9 1AB (Mon-Thursday 08:30-17:00 & Friday 8.30 – 16.30);
- Beeston Library, Foster Avenue, Beeston, Nottingham NG9 1AE (0115 925 5168);
- Chilwell (Inham Nook) Library, Barn Croft, Chilwell, Nottingham NG9 4HU (0115 804 4363);
- Eastwood Library, Wellington Place, Eastwood, Nottingham NG16 3GB (01773 712209);
- Kimberley Library, Main Street, Kimberley, Nottingham NG16 2LY (0115 804 4363);
- Stapleford Library, Church Street, Stapleford, Nottingham NG9 8GA (0115 939 9178);
- Toton Library, Stapleford Lane, Toton, Nottingham NG9 6GA (0115 804 4363).

Opening times for the libraries can be found online at: [www.inspireculture.org.uk/reading-information/](http://www.inspireculture.org.uk/reading-information/)

Should you have any queries relating to this consultation, you can contact the Planning Policy team on 0115 917 3452 or email [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

**Large print copies of this notice are available on request.**

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# Details

Agent (if applicable)

Please provide your client's name	
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Your details

Title	Mr
Name	Michael Smith
Organisation	Awsorth Neighbourhood Plan Steering Group
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	Main Modification - MM11 - Policy 4.1 Land west of Awsorth (inside the bypass) MM11- 4.4- OBJECTION Key Development Requirements – 2(c), 3(c) Key Development Aspirations – 2 Justification – 4.7, 4.8
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No

## Reasons for Support or Objection

OBJECTION – 4.4 - Key Development Requirements - 2 (c) – As regards welcome inclusion of reference to enhance bus routes 'within the site' (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H1(f)(vi). However, it remains unclear as regards reference to 'enhance bus routes adjacent to the site' given that there are no existing bus routes adjacent to the site.

OBJECTION – 4.4 - Key Development Requirements - 3 (c) – As regards welcome inclusion of reference to 'Ensure that development protects and mitigates any negative impacts on Common Toads should they be found on the site'. In addition, it should be noted that migrating amphibians, including toads, pass from the existing housing estate gardens (located to the immediate east) moving westwards across the site. This highlights the importance of ensuring new boundary treatment within the new housing development is as porous as possible to facilitate easy movement for amphibians and other species found in the local area (Awsworth Neighbourhood Plan proposed submission policy H 1 (l) supports).

OBJECTION – 4.4 – Key Development Aspiration 2 – As regards welcome revised reference helpfully making clear that 'vehicular access to the site will be from the bypass' (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H 1 (f) (i)). However, with reference to '....although more limited vehicular access is expected from Newtons Lane (designed to deter 'rat-running')'. We are seriously concerned that reference continues to be made to more limited vehicular access being expected from Barlow Drive North. We have previously brought this to the attention of Broxtowe Borough Council. Harworth Estates, promoters of the new housing development on 'land west of Awsworth (inside the bypass)', have confirmed that they do not propose to allow any vehicular access via Barlow Drive North (or Park Hill) but that these would provide pedestrian and cycle links. This reflects the concerns of the local community that no more traffic should be allowed to use Station Road / Park Hill, which is the only vehicular access to the existing housing estate and more than half of Awsworth's homes.

OBJECTION – 4.7 – As regards Justification – As regards welcome inclusion of new justification text expecting that development will assist in securing enhancements to the existing bus route (through Awsworth village).

However, as mentioned in relation to 2 (c) the existing bus route (through the village) is not adjacent to the site.

Also, reference to 'existing stop' should presumably read 'stops' given that a number of the existing stops in Awsworth and those on Awsworth Lane, Cossall, would all serve different parts of the site. New residents in the northern part of the site are likely to use bus stops at The Donkey Piece (Gin Close Way / Main Street). Those in the central part of the site would be closest to stops at Middleton Street while the southern part of the site is nearer to stops on Awsworth Lane, Cossall. We note there is no longer any mention of buses along the bypass, something we raised in the context of there being no existing bus route /service adjacent to the site.

Note that Awsworth Neighbourhood Plan proposed submission policy H 1 (f) (vi) refers to 'enable bus access through the site, to facilitate provision of conveniently accessible public transport services, (which can provide links to the main nearby urban centres, as well as Ilkeston Station)'. This acknowledges that provision of a service is primarily a matter for the bus operator (Trent Barton currently operate the local No 27 service through Awsworth).

OBJECTION – 4.8 – As regards Justification and inclusion of new text – This should be made clearer. As mentioned in relation to Key Development Aspiration 2 and reference to vehicular access via Barlow Drive North. Awsworth Neighbourhood Plan proposed submission policy H 1 (f) (i) makes clear that 'There should be no vehicular access via Park Hill or Barlow Drive North' which the local community consider to be an essential condition of the new housing development and which Harworth, promoters of the scheme, have confirmed is not part of their proposal. We have previously raised the matter of what is said about access being expected via Park Hill and Barlow Drive North. While this is not being offered as a main modification we would reiterate what we have previously said, that neither Awsworth Neighbourhood Plan nor Harworth Estates propose vehicular access from Park Hill or Barlow Drive North but do propose walking and cycling links.

OBJECTION - 4.8 – As regards Justification and inclusion of new text – This should be clearer with reference to 'the access from the bypass having the additional benefit of providing the most direct route to Bennerley Viaduct'.

We assume the contribution towards the conservation or enhancement of Bennerley Viaduct would include an enhanced pedestrian / cycle crossing near Naptha House. However, reference to a new access off the bypass providing a more direct route to Bennerley Viaduct is unclear.

Our understanding is that the new (main) vehicular access would be constructed some distance south of the existing pedestrian / cycle crossing point located close to the south of the Naptha House access stub-road. This crossing point provides the most direct route from Awsworth to Bennerley Viaduct for walkers and cyclists. We further understand that this crossing point would be up-graded as part of the new light-controlled main access to the housing site to provide a safer and more convenient crossing for walkers and cyclists. We consider that this should be made clearer.

# Details

Agent (if applicable)

Please provide your client's name	
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Your details

Title	Mrs
Name	Mary Smith
Organisation	Mrs
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	Policy 4.1 Land West of Awsworth (Inside the bypass) 4.4 Key Development Aspiration 2
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	Access from Barlow Drive North to proposed site is not acceptable due to the following reasons: 1.If Barlow Drive North were to provide limited access this would increase the traffic on Barlow Drive North which is already too narrow for the volume of traffic it already has 2.It would be used by the residents on the proposed site as a quicker way than access from the bypass, so the impact would not be limited 3.Extra traffic on Barlow Drive North would affect the road safety of existing residents and be dangerous to young children living on the road with the increase traffic 4. Extra traffic in the village would increase pollution 5. My proposal would be access from the Bypass and Newtons Lane only as Newtons Lane is wider and could cope with the additional limited amount of traffic



**Genway, Tom**

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**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awsworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new

builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



Nottinghamshire Wildlife Trust is the county's largest environmental charity - run by local people for the benefit of local wildlife. We manage nature reserves across the county, champion nature and inspire adults and children about the natural world. Together we are working to create a Living Landscape for Nottinghamshire.

**Are you a member of Nottinghamshire Wildlife Trust?**

**Join us now online** [REDACTED]

To find out how we use and protect your personal data, please see our Privacy Policy on our website at [www.nottinghamshirewildlife.org](http://www.nottinghamshirewildlife.org)

Registered office: The Old Ragged School, Brook St, Nottingham NG1 1EA  
Registered in England & Wales: no. 748865. Charity no.224168R

21 June 2019

Our ref: Broxtowe 8

Dear Sir/Madam

## Broxtowe Local Plan part 2 Main Modifications

Thank you for the opportunity to comment on your consultation.

In relation to the Modifications to:

Policy 1: Flood Risk Severn Trent are supportive of the including a reference to Sustainable Drainage Systems, due to the need to manage surface water in a sustainable way ensuring that flood risk downstream is not increased.

We would however also advise that a reference to the Drainage Hierarchy (paragraph 80 of Planning Practice Guidance) as this approach also support the sustainable management for surface water by ensuring that water is returned to the natural water cycle, reducing the risk of flooding.

In relation to bullet point C ii we would not recommend setting minimum brownfield improvement % as the non-Statutory Technical Standards for sustainable Drainage state

*“For developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event.”*

By setting a minimum betterment additional achievable reductions beyond 30% are likely to be missed.

Green Infrastructure is mentioned specifically within a number of policies including Policy 4.1: Land West of Awworth, this policy includes the bullet point:

*“retain hedgerows and incorporate these into any landscape scheme”*

Severn Trent are supportive of the protection of existing biodiversity assets such as Trees and hedgerows, but would also recommend that watercourses are included within this section to ensure that Ditches, land drains and watercourses are not lost through development. These assets provide vital links to the sustainable management of surface water and can also be utilised to develop Blue-Green corridors that will enhance biodiversity and amenity within development, provided that they are protected and retained within open spaces.

Severn Trent are supportive of references to SuDS being utilised within site specific policies such as policy 5.1: East of Church lane, Brinsley, however we would recommend that this approach to reference SuDS within each of the site specific policies is utilised to highlight that all sites are required to incorporate SuDS.

Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you.

### **Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

### **Sewage Strategy**

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

### **Surface Water and Sewer Flooding**

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

### **Water Quality**

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals

should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

### Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

### Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Chris Bramley

Strategic Catchment Planner

[Redacted signature]

**Genway, Tom**

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**From:** Genway, Tom  
**Sent:** 11 June 2019 08:07  
**To:** 'Judith Woolley'  
**Cc:** Lawson, Dave; Fardell, Matthew; Vernon, Amanda  
**Subject:** RE: Planning policy

**Importance:** High

Dear Judith,

Thank you for your email, which we will forward to the Inspector who is examining the Broxtowe Part 2 Local Plan.

I apologise for any difficulties that you experienced in completing the online response form. I have asked our website designers to check the site and fix the error that was occurring, and now everything should be working as it is supposed to.

Once again, I would like to apologise for any inconvenience caused, and would like to thank you for taking the time to comment on the Part 2 Local Plan.

Should you require any further information or assistance, please do not hesitate to contact me.

Many thanks  
Kind regards  
Tom

Tom Genway MRTPI  
Senior Planning Policy Officer  
[REDACTED]

Broxtowe Borough Council  
Neighbourhoods & Prosperity  
Chief Executive's Department  
Council Offices, Foster Avenue  
Beeston, Nottingham, NG9 1AB  
Tel: 0115 917 7777  
[www.broxtowe.gov.uk](http://www.broxtowe.gov.uk)

-----Original Message-----

**From:** Judith Woolley [REDACTED]  
**Sent:** 10 June 2019 15:06  
**To:** Policy  
**Subject:** Planning policy

Dear Sir,

My name is Judith Woolley and I would like to send a comment on the planning for the upgrade of Bennerley Viaduct.

I tried to use the Planning Policy section on the website, but it would not work.

I then telephoned the Council today.

Here is my comment:-

I consider the work being done by the people working for this improvement, to be of considerable importance.

The Viaduct is the only engineering left since the brick one was demolished.

It is an important piece of work and can be made to be the connection for walkers and cyclists between both sides of the river and canal.

It has great potential as a Tourist destination, as it has been demonstrated, with many visitors coming from distant areas.

I am happy to have my comments in public view if that is needed.

Yours sincerely

Judith Woolley

Sent from my iPad

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Michael Smith
Organisation	Awsorth Neighbourhood Plan Steering Group
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	Main Modification - MM11 - Policy 4.1 Land west of Awsorth (inside the bypass) MM11- 4.4 - SUPPORT 4.4 – Clarification – number of dwellings & Key Development Requirement policy headings Key Development Requirements – 2(a), 2(b), 2(c), 3(a), 3(b), 3(c), 4(a) Key Development Aspirations – 1, 2
Do you support or object to the Main Modification?	Support

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).	
It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No



<p><b>Reasons for Support or Objection</b></p>	<p>SUPPORT - 4.4 – Welcome clarification of exact number (2) existing dwellings on the site in response to representations from Awsworth Parish Council and Awsworth Neighbourhood Plan Steering Group. Our understanding is that while 'White House Farm' (in Cossall) would be demolished 'The View' (in Awsworth) does not form part of the development site or proposals and would be retained.</p> <p>SUPPORT – 4.4 – Key Development Requirements – Inclusion of policy headings is helpfully clearer.</p> <p>SUPPORT – 4.4 – Key Development Requirements - 2 (a) and 2 (b) – Welcome clarification that in addition to pedestrian crossing points and routes these should make provision for cycle crossing points and routes including through the site and clarification of where the routes need to link to -(particularly now 2 (a) more helpfully includes specific reference 'towards Bennerley Viaduct', which accords with and supports Awsworth Neighbourhood Plan proposed submission policies BV1 'Bennerley Viaduct' and BV 2 'Bennerley Viaduct Visual Setting' and 2 (b) makes clear walking and cycling routes should be provided through the site and enhance links to the wider network).</p> <p>SUPPORT – 4.4 - Key Development Requirements – 2 (c) - Welcome inclusion of reference to enhance bus routes 'within the site' (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H1(f)(vi).</p> <p>SUPPORT – 4.4 - Key Development Requirements - 3 (a) - Welcome inclusion of reference to Great Northern Path (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy BED 2: 'Local Areas of Special Character' which includes the Great Northern Line Local Area of Special Character).</p> <p>SUPPORT – 4.4 – Key Development Requirements - 3 (b) – Welcome inclusion of reference to 'Retain hedgerows and incorporate these into any landscaping scheme'. However, would refer you to Awsworth Neighbourhood Plan proposed submission policy H1 (k) which states 'Retain, and where possible, improve existing important boundaries and features such as trees and hedgerows of good amenity or aboricultural / biodiversity value'. Also, note that in response to comments by Harworth Estates it is proposed to add to policy 'Where features are unavoidably lost they will be replaced by suitable new planting'.</p> <p>SUPPORT – 4.4 - Key Development Requirements - 3 (c) – Welcome inclusion of reference to 'Ensure that development protects and mitigates any negative impacts on Common Toads should they be found on the site' (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H 1 (m)).</p> <p>SUPPORT – 4.4 - Key Development Requirements - 4 (a) – Particularly welcome inclusion of a new Key Development Requirement specifically relating to 'Heritage' to ensure that development maintains or enhances the setting of heritage assets including the Grade II* Listed Bennerley Viaduct and where possible contributes to its conservation or enhancement (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed policies BV 1 'Bennerley Viaduct' and BV 2 'Bennerley Viaduct Visual Setting').</p> <p>SUPPORT – 4.4 – Key Development Aspiration 1 - Note that 'Key Development Aspiration' suggests only one Key Development Aspiration when in fact 2 are now listed. Welcome revised Key Development Aspiration 1 which helpfully makes clear reference to 2 important aspects –</p> <ul style="list-style-type: none"> <li>(i) 'Sustainable transport measures will be fully utilised to reduce reliance on the private car' (which also helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy TT 3: 'Sustainable Transport'), and;</li> <li>(ii) 'Where there are residual cumulative impacts on the highway networks these should be mitigated to ensure that they are not severe' (which also helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H 1 (f)(i) – (iv)).</li> </ul> <p>SUPPORT – 4.4 - Key Development Aspiration 2 – Note that 'Key Development Aspiration' suggests only one Key Development Aspiration when in fact 2 are now listed. Welcome that revised reference helpfully makes clear that 'vehicular access to the site will be from the bypass' (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H 1 (f) (i)).</p> <p>SUPPORT – 4.6 – As regards Justification – Welcome inclusion of new justification text to add clarity to policy expectation regarding Bennerley Viaduct 'Bringing the viaduct back into use through the provision of public access across the viaduct forms an important part of an aspiration for a network of long-distance walking and cycling routes' and that "New residential development should make a proportionate contribution to enable this aspiration to be realised (which also helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policies BV 1 'Bennerley Viaduct' and BV 2 'Bennerley Viaduct Visual Setting').</p> <p>SUPPORT – 4.7 – As regards Justification – Welcome inclusion of new justification text expecting that as part of a planning application it will be expected that the applicant demonstrates the development will assist in securing enhancements to the existing bus route (through Awsworth village). Reference to enhanced bus route would require buses to be able to physically pass through the site. However, this would not guarantee a bus service being provided. But note reference to contribution for provision off-site at 'the stop'. However, it is not clear which stop is intended. Potentially other stops are likely to serve the site (Donkey Piece, Middleton Street) depending which would be more convenient to new residents. In addition, the stops on Awsworth Lane in Cossall would be closest for those at the southern end of the site. We note there is no longer any mention of buses along the bypass, something we raised in the context of there being no existing bus route /service adjacent to the site.</p> <p>SUPPORT – 4.8 – As regards Justification - Welcome inclusion of new text to clarify the position regarding access whereby an acceptable access can be achieved from the bypass (which accords with and supports Awsworth Neighbourhood Plan proposed submission policy H 1 (f) (i) which makes clear 'primary vehicular access to</p>
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	the site via the A6096 Shilo Way to the north west and secondary more limited vehicular access via Newtons Lane, Cossall, to the south (providing a link to Awsworth Village via The Lane) is supported'.
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# Details

Agent (if applicable)

Please provide your client's name	
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Your details

Title	Mrs
Name	Hayley Holt
Organisation	Awsorth Parish Council
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	Main Modification - MM11 - Policy 4.1 Land west of Awsorth (inside the bypass)  MM11- 4.4- OBJECTION Key Development Requirements – 2(c), 3(c) Key Development Aspirations – 2 Justification – 4.7, 4.8
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No




Reasons for Support or Objection	<p>OBJECTION – 4.4 - Key Development Requirements - 2 (c) – As regards welcome inclusion of reference to enhance bus routes 'within the site' (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H1(f)(vi). However, it remains unclear as regards reference to 'enhance bus routes adjacent to the site' given that there are no existing bus routes adjacent to the site.</p> <p>OBJECTION – 4.4 - Key Development Requirements - 3 (c) – As regards welcome inclusion of reference to 'Ensure that development protects and mitigates any negative impacts on Common Toads should they be found on the site'. In addition, it should be noted that migrating amphibians, including toads, pass from the existing housing estate gardens (located to the immediate east) moving westwards across the site. This highlights the importance of ensuring new boundary treatment within the new housing development is as porous as possible to facilitate easy movement for amphibians and other species found in the local area (Awsworth Neighbourhood Plan proposed submission policy H 1 (l) supports).</p> <p>OBJECTION – 4.4 – Key Development Aspiration 2 – As regards welcome revised reference helpfully making clear that 'vehicular access to the site will be from the bypass' (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H 1 (f) (i)). However, with reference to '....although more limited vehicular access is expected from Newtons Lane (designed to deter 'rat-running')'. We are seriously concerned that reference continues to be made to more limited vehicular access being expected from Barlow Drive North. We have previously brought this to the attention of Broxtowe Borough Council. Harworth Estates, promoters of the new housing development on 'land west of Awsworth (inside the bypass)', have confirmed that they do not propose to allow any vehicular access via Barlow Drive North (or Park Hill) but that these would provide pedestrian and cycle links. This reflects the concerns of the local community that no more traffic should be allowed to use Station Road / Park Hill, which is the only vehicular access to the existing housing estate and more than half of Awsworth's homes.</p> <p>OBJECTION – 4.7 – As regards Justification – As regards welcome inclusion of new justification text expecting that development will assist in securing enhancements to the existing bus route (through Awsworth village). However, as mentioned in relation to 2 (c) the existing bus route (through the village) is not adjacent to the site. Also, reference to 'existing stop' should presumably read 'stops' given that a number of the existing stops in Awsworth and those on Awsworth Lane, Cossall, would all serve different parts of the site. New residents in the northern part of the site are likely to use bus stops at The Donkey Piece (Gin Close Way / Main Street). Those in the central part of the site would be closest to stops at Middleton Street while the southern part of the site is nearer to stops on Awsworth Lane, Cossall. We note there is no longer any mention of buses along the bypass, something we raised in the context of there being no existing bus route /service adjacent to the site. Note that Awsworth Neighbourhood Plan proposed submission policy H 1 (f) (vi) refers to 'enable bus access through the site, to facilitate provision of conveniently accessible public transport services, (which can provide links to the main nearby urban centres, as well as Ilkeston Station)'. This acknowledges that provision of a service is primarily a matter for the bus operator (Trent Barton currently operate the local No 27 service through Awsworth).</p> <p>OBJECTION – 4.8 – As regards Justification and inclusion of new text – This should be made clearer. As mentioned in relation to Key Development Aspiration 2 and reference to vehicular access via Barlow Drive North. Awsworth Neighbourhood Plan proposed submission policy H 1 (f) (i) makes clear that 'There should be no vehicular access via Park Hill or Barlow Drive North' which the local community consider to be an essential condition of the new housing development and which Harworth, promoters of the scheme, have confirmed is not part of their proposal. We have previously raised the matter of what is said about access being expected via Park Hill and Barlow Drive North. While this is not being offered as a main modification we would reiterate what we have previously said, that neither Awsworth Neighbourhood Plan nor Harworth Estates propose vehicular access from Park Hill or Barlow Drive North but do propose walking and cycling links.</p> <p>OBJECTION - 4.8 – As regards Justification and inclusion of new text – This should be clearer with reference to 'the access from the bypass having the additional benefit of providing the most direct route to Bennerley Viaduct'. We assume the contribution towards the conservation or enhancement of Bennerley Viaduct would include an enhanced pedestrian / cycle crossing near Naptha House. However, reference to a new access off the bypass providing a more direct route to Bennerley Viaduct is unclear. Our understanding is that the new (main) vehicular access would be constructed some distance south of the existing pedestrian / cycle crossing point located close to the south of the Naptha House access stub-road. This crossing point provides the most direct route from Awsworth to Bennerley Viaduct for walkers and cyclists. We further understand that this crossing point would be up-graded as part of the new light-controlled main access to the housing site to provide a safer and more convenient crossing for walkers and cyclists. We consider that this should be made clearer.</p>
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# Details

Agent (if applicable)

Please provide your client's name	
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Your details

Title	Mrs
Name	Hayley Holt
Organisation	Awsorth Parish Council
Address	
Tel. Number	
E-mail address	

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	Main Modification - MM11 - Policy 4.1 Land west of Awsorth (inside the bypass)  MM11- 4.4 - SUPPORT 4.4 – Clarification – number of dwellings & Key Development Requirement policy headings Key Development Requirements – 2(a), 2(b), 2(c), 3(a), 3(b), 3(c), 4(a) Key Development Aspirations – 1, 2
Do you support or object to the Main Modification?	Support

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
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<p><b>Reasons for Support or Objection</b></p>	<p>SUPPORT - 4.4 – Welcome clarification of exact number (2) existing dwellings on the site in response to representations from Awsworth Parish Council and Awsworth Neighbourhood Plan Steering Group. Our understanding is that while 'White House Farm' (in Cossall) would be demolished 'The View' (in Awsworth) does not form part of the development site or proposals and would be retained.</p> <p>SUPPORT – 4.4 – Key Development Requirements – Inclusion of policy headings is helpfully clearer.</p> <p>SUPPORT – 4.4 – Key Development Requirements - 2 (a) and 2 (b) – Welcome clarification that in addition to pedestrian crossing points and routes these should make provision for cycle crossing points and routes including through the site and clarification of where the routes need to link to -(particularly now 2 (a) more helpfully includes specific reference 'towards Bennerley Viaduct', which accords with and supports Awsworth Neighbourhood Plan proposed submission policies BV 1 'Bennerley Viaduct' and BV 2 'Bennerley Viaduct Visual Setting' and 2 (b) makes clear walking and cycling routes should be provided through the site and enhance links to the wider network).</p> <p>SUPPORT – 4.4 - Key Development Requirements – 2 (c) - Welcome inclusion of reference to enhance bus routes 'within the site' (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H1(f)(vi)).</p> <p>SUPPORT – 4.4 - Key Development Requirements - 3 (a) - Welcome inclusion of reference to Great Northern Path (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy BED 2: 'Local Areas of Special Character' which includes the Great Northern Line Local Area of Special Character).</p> <p>SUPPORT – 4.4 – Key Development Requirements - 3 (b) – Welcome inclusion of reference to 'Retain hedgerows and incorporate these into any landscaping scheme'. 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Also, note that in response to comments by Harworth Estates it is proposed to add to policy 'Where features are unavoidably lost they will be replaced by suitable new planting'.</p> <p>SUPPORT – 4.4 - Key Development Requirements - 3 (c) – Welcome inclusion of reference to 'Ensure that development protects and mitigates any negative impacts on Common Toads should they be found on the site' (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H 1 (m)).</p> <p>SUPPORT – 4.4 - Key Development Requirements - 4 (a) – Particularly welcome inclusion of a new Key Development Requirement specifically relating to 'Heritage' to ensure that development maintains or enhances the setting of heritage assets including the Grade II* Listed Bennerley Viaduct and where possible contributes to its conservation or enhancement (which helpfully accords with and supports Awsworth Neighbourhood Plan proposed policies BV 1 'Bennerley Viaduct' and BV 2 'Bennerley Viaduct Visual Setting').</p> <p>SUPPORT – 4.4 – Key Development Aspiration 1 - Note that 'Key Development Aspiration' suggests only one Key Development Aspiration when in fact 2 are now listed. Welcome revised Key Development Aspiration 1 which helpfully makes clear reference to 2 important aspects –  (i) 'Sustainable transport measures will be fully utilised to reduce reliance on the private car' (which also helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy TT 3: 'Sustainable Transport'), and;  (ii) 'Where there are residual cumulative impacts on the highway networks these should be mitigated to ensure that they are not severe' (which also helpfully accords with and supports Awsworth Neighbourhood Plan proposed submission policy H 1 (f)(i) – (iv)).</p> <p>SUPPORT – 4.4 - Key Development Aspiration 2 – Note that 'Key Development Aspiration' suggests only one Key Development Aspiration when in fact 2 are now listed. 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	proposed submission policy H 1 (f) (i) which makes clear 'primary vehicular access to the site via the A6096 Shilo Way to the north west and secondary more limited vehicular access via Newtons Lane, Cossall, to the south (providing a link to Awsworth Village via The Lane) is supported'.
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# Main Modifications 12

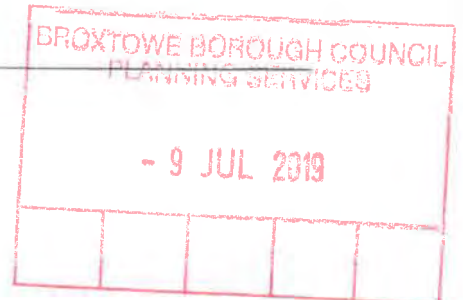


[REDACTED]

28<sup>th</sup> June 2019.

RE : PART 2 LOCAL PLAN :  
MAIN MODIFICATIONS CONSULTATION.  
BRINSLEY

TO : STEFFAN SAUNDERS  
AND HELEN MCKENHULL.



I have objected to building to the  
back of Church Lane, the main objection  
being the damage and harm caused to  
the Green Belt, notably alongside the  
Nature Reserve.

MM37. Policy 31 Biodiversity Assets.

It is essential here to look at the  
bigger picture and consider the damage  
to the countryside and green belt around  
the two fields proposed for building.  
The development would cause significant  
harm to the area and the habitats it  
contains. Adjacent to the development  
is a site for woodland flowers, a  
site site consisting of an old oak wood  
and a former mineral site. All these  
sites contain old uncut hedgerows,

a variety of trees of varying ages,  
shrub and meadows.

The total number of species recorded  
by the Headstocks Group since its  
formation around ten years ago is  
as follows: ✓

85 BIRDS  
21. BUTTERFLY.  
117 MOTH  
290+ FLORA. (Further records are now  
being added by the A.M.S. Recorder.)  
36 INTRODUCED FLORA.  
11 DRAGONFLIES  
59 FUNGI.  
23 LICHEN.

These records have been compiled by  
reliable individuals / groups including  
the A.M.S. Botanical Recorder, A.M.S. Trust and  
A.M.S. Bird Watchers Soc.

The development site contains several  
hedgerows and brookside trees including  
a veteran ash tree. This site is used  
by breeding birds. The species  
which breed or are considered to breed  
include Blackcap, Phylloscopus, Bullfinch  
and Little Owl. The site is also a  
feeding location for 'winter' thrush  
(Redwing & Fieldfare) which can be  
seen feeding in the fields and uncultivated.

The Western Wiv, a now fast declining species in Juk, and the UK, was a resident of the grasscock site until recently and an effort has been made to encourage the species to return with suitably placed nest boxes.

It is unnecessary to build on green belt in Broxlowe, particularly when damage has done to a locally important wildlife site and the surrounding area. If 100 houses have to build in Brinsley Parish then a site chosen by residents on Purdy Lane would be a more sensible option. This site is low grade farmland and uninteresting for all aspects of wildlife.



(P.A. Oxley.)

## Genway, Tom

---

**From:** POXON ANDREA [REDACTED]  
**Sent:** 05 July 2019 18:06  
**To:** Policy  
**Cc:** [REDACTED]  
**Subject:** CHURCH LANE BRINSLEY DEVELOPMENT

Good afternoon,

I am against the church Lane development site because of the following,

A. I do not recall any information ie; plans at the Brinsley meetings being available reference this site, BUT I saw the **alternative site at Cordy Lane** that was Shown.

I feel the **alternative site on Cordy Lane, that has not really even been discussed by the council for some reason** on the other side of the village is far better because ,

1. It will have less impact **aesthetically** ,on the area,also on the DH Lawrence **historic** " country of my heart" views and area, after all he is not just some local writer , we should be promoting the historic area, not destroying it when there are **alternative sites** available.

The ribbon building on this side of the road was put in place to protect the green fields, that is the main reason the rest of the houses are on the other side of the road!.

2.Lets look at the risk assessment and health and safety implications of children and residences who will be attending the schools and using the shops , public houses, and restaurants , we are all aware( see Tony Harper) that the Mansfield Road at Eastwood and Brinsley has a lot of traffic on it and it travels at speed, we are all aware it needs speed cameras, if you did a risk assessment for children crossing the road etc. it would be high, so again the **alternative site at Cordy Lane** would be far safer and better.

3. It will have less impact on the nature reserve that volunteers loving tend and I known they have voiced their concerns , plus ' Aunt Polly's' cottage that features in the book the Odour of Chrysanthemums is there.

4. Because of the lack of availability of plans, information and a lack transparency at the meetings for the Church lane site( maybe the developer thought he had no need to present them? if so why?) the residents of the local area have not been fully informed about the site or made aware of the impacts this site will entail, as it creates a new small settlement and adds to urban sprawl, also goes against green belt policy .

5. When they build at Nethergreen, there will be very little separating Brinsley and Eastwood , we can see this and how it happens by looking at Kimberley and Giltbrook.

6. I am sure the main body of residents had little objection to the Cordy Lane site? but how can the decide this and make an informed decision if they have not been shown plans of the Church Lane site ?

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Sheena Trower
Organisation	Brinsley Parish Council
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	Main Modification MM12
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>Brinsley Parish Council object to the wording of the Modification because it does not clearly state the position regarding the SUDS/Open Space Area.</p> <p>It was clear from the first Modifications, after a representation to the Planning Inspector, that the SUDS area would NOT be a public amenity area. Reasons included Health &amp; Safety issues regarding children in the proximity of the attenuation ponds and the fact that the absence of public and dogs from the area would enhance a wildlife corridor which would stretch from Newstead and Felley to the Erewash Valley reserves.</p> <p>As confirmed by Broxtowe Planning Policy department,</p> <p>Policy 5.1 does NOT say the area will be publicly accessible.</p> <p>Justification 5.8 also does not mention the area being publicly accessible.</p> <p>An error appears to have been made the Reason for Change column on page 50 of the Modifications report.</p> <p>The Policy quite clearly is NOT to have the SUDS area as public amenity space and the Parish Council trusts the final Stage 2 Local Plan will make that clear.</p> <p>Brinsley Parish Council has no objection to the rest of the MM12.</p>

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<del>Mr</del> <del>Mrs</del> Miss <del>Ms</del> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

3

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

☒

Object

☐

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM3 - policy 3.1 Chetwynd Barracks

HE Supports the additional information in respect of designated and non-designated heritage assets.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<del>Mr</del> <del>Mrs</del> Miss <del>Ms</del> Other:
Name	ROSAMUND WORRALL
Organisation (If responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)



1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

11

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object



3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM 11 - Policy E.1 Land west of Ainsworth

He supports the additional information in respect of Bennerley Viaduct.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr Mrs Miss <del>Me</del> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

12

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object



3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM12 - Policy S.1 East of Church Lane, Brinsley

HE supports criteria 4 and the use of 'conserve' instead of 'preserve' in line with NPPF terminology.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input checked="" type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

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*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

32

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM 32 - Policy 23: proposals affecting designated and non-designated heritage assets.

HE supports clarification about assessment of harm in Part 2 and the use of 'conserve' instead of 'preserve' in Part 3 all in line with NPPF requirements and terminology.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr Mrs Miss Ms Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes



Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

38

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM38- Policy 32: Develop Contributions

HE supports the inclusion of criteria 1i in respect of the historic environment, heritage assets and setting.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Miss
Name	Jenny Sissons MA (formerly Page)
Organisation	NONE - PERSONAL RESPONSE
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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## Questions

Which Main Modification does this response relate to?	MM 12
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No

Reasons for Support or Objection

I strongly object to the wording of the Modification because it does not clearly state the position re the SUDS / Open space area adjoining Church Lane  
It was clear from the first Modifications, after my submission to the Inspector at the Hearing, that the SUDS area would NOT be a public amenity area. Reasons included Health & Safety issues re children in the proximity of the Attenuation ponds, and the fact that the absence of public and dogs from the area would enhance a wildlife corridor which would stretch from Newstead and Felley to the Erewash Valley reserves. I also pointed out that there are already large areas / many footpaths providing public amenity space around the village, in addition to the Headstocks area and the playing field / children's play area / MUGA (Multi use games area) / outdoor gym and the bowls facility.

As confirmed by Broxtowe Planning Policy department, Policy 5.1 does NOT say the area will be publicly accessible.  
Justification 5.8 also does not mention the area being publicly accessible  
An error appears to have been made in the Reason For Change column on page 50 of the Modifications report

The Policy quite clearly is NOT to have the SUDS area as public amenity space, and I trust the final Stage 2 Local Plan will make that clear.  
I support the rest of MM12.



## Genway, Tom

---

**From:** Maureen Lees [REDACTED]  
**Sent:** 06 June 2019 10:41  
**To:** Genway, Tom  
**Subject:** RE: Local plan - Brinsley. The alterations to the local plan seem OK, but ..... The village as a whole prefer the Cordy Lane site which would leave the aspect of the village alone, The owner of the Cordy Lane site applied long ago and had all survey's done

I and most of the other villagers will be very angry if you do not choose the Cordy Lane site for development. And leave the green belt alone. Maureen Lees.

Sent from [Mail](#) for Windows 10

---

**From:** [Genway, Tom](#)  
**Sent:** 04 June 2019 14:31  
**To:** [REDACTED]  
[REDACTED]

**Subject:** RE: Local plan - Brinsley. The alterations to the local plan seem OK, but ..... The village as a whole prefer the Cordy Lane site which would leave the aspect of the village alone, The owner of the Cordy Lane site applied long ago and had all survey's done  
**Importance:** High

Dear Maureen,

Thank you for your email.

Could I please check whether you intended to make any additional comments, in addition to those shown in the 'subject' title of your email?

Please do not hesitate to contact me if you would like any further information or assistance.

Many thanks  
Kind regards  
Tom

---

Tom Genway MRTPI  
Senior Planning Policy Officer  
[REDACTED]

Broxtowe Borough Council  
Neighbourhoods & Prosperity  
Chief Executive's Department  
Council Offices, Foster Avenue  
Beeston, Nottingham, NG9 1AB  
Tel: 0115 917 7777  
[www.broxtowe.gov.uk](http://www.broxtowe.gov.uk)

---

**From:** Maureen Lees [REDACTED]  
**Sent:** 27 May 2019 22:18  
**To:** Policy

**Subject:** Local plan - Brinsley. The alterations to the local plan seem OK, but ..... The village as a whole prefer the Cordy Lane site which would leave the aspect of the village alone, The owner of the Cordy Lane site applied long ago and had all survey's done

Sent from [Mail](#) for Windows 10

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This disclaimer confirms that this email message has been swept for the presence of computer viruses.

## Genway, Tom

---

**From:** Genway, Tom  
**Sent:** 04 June 2019 14:33  
**To:** 'brian.deller'  
**Cc:** Lawson, Dave; Fardell, Matthew  
**Subject:** RE: I believe that the plan fails it's obligation to Brinsley by ignoring the results of the referendum held in Brinsley. This came down in favour of the Cordy Lane site not Church Lane.

Dear Brian,

Thank you for your email.

Could I please check whether you intended to make any additional comments, in addition to those shown in the 'subject' title of your email?

Please do not hesitate to contact me if you would like any further information or assistance.

Many thanks  
Kind regards  
Tom

---

Tom Genway MRTPI  
Senior Planning Policy Officer  
[REDACTED]

Broxtowe Borough Council  
Neighbourhoods & Prosperity  
Chief Executive's Department  
Council Offices, Foster Avenue  
Beeston, Nottingham, NG9 1AB  
Tel: 0115 917 7777  
[www.broxtowe.gov.uk](http://www.broxtowe.gov.uk)

---

**From:** brian.deller [REDACTED]  
**Sent:** 24 May 2019 15:14  
**To:** Policy  
**Subject:** I believe that the plan fails it's obligation to Brinsley by ignoring the results of the referendum held in Brinsley. This came down in favour of the Cordy Lane site not Church Lane.

Sent from my Samsung Galaxy smartphone.

**Genway, Tom**

---

**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awsworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new

builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



Nottinghamshire Wildlife Trust is the county's largest environmental charity - run by local people for the benefit of local wildlife. We manage nature reserves across the county, champion nature and inspire adults and children about the natural world. Together we are working to create a Living Landscape for Nottinghamshire.

**Are you a member of Nottinghamshire Wildlife Trust?**

**Join us now online** [REDACTED]

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Registered office: The Old Ragged School, Brook St, Nottingham NG1 1EA  
Registered in England & Wales: no. 748865. Charity no.224168R

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Samuel Moss
Organisation	None
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	No
---	----

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## Questions

Which Main Modification does this response relate to?	Church Lane, Brinsley
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	It doesn't take into account the strong opposition of this site from our village. Village consultation overwhelmingly chose an alternative which has just been completely ignored by Broxtowe Borough Council.

21 June 2019

Our ref: Broxtowe 8

Dear Sir/Madam

## Broxtowe Local Plan part 2 Main Modifications

Thank you for the opportunity to comment on your consultation.

In relation to the Modifications to:

Policy 1: Flood Risk Severn Trent are supportive of the including a reference to Sustainable Drainage Systems, due to the need to manage surface water in a sustainable way ensuring that flood risk downstream is not increased.

We would however also advise that a reference to the Drainage Hierarchy (paragraph 80 of Planning Practice Guidance) as this approach also support the sustainable management for surface water by ensuring that water is returned to the natural water cycle, reducing the risk of flooding.

In relation to bullet point C ii we would not recommend setting minimum brownfield improvement % as the non-Statutory Technical Standards for sustainable Drainage state

*“For developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event.”*

By setting a minimum betterment additional achievable reductions beyond 30% are likely to be missed.

Green Infrastructure is mentioned specifically within a number of policies including Policy 4.1: Land West of Awworth, this policy includes the bullet point:

*“retain hedgerows and incorporate these into any landscape scheme”*

Severn Trent are supportive of the protection of existing biodiversity assets such as Trees and hedgerows, but would also recommend that watercourses are included within this section to ensure that Ditches, land drains and watercourses are not lost through development. These assets provide vital links to the sustainable management of surface water and can also be utilised to develop Blue-Green corridors that will enhance biodiversity and amenity within development, provided that they are protected and retained within open spaces.

Severn Trent are supportive of references to SuDS being utilised within site specific policies such as policy 5.1: East of Church lane, Brinsley, however we would recommend that this approach to reference SuDS within each of the site specific policies is utilised to highlight that all sites are required to incorporate SuDS.

Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you.

### **Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

### **Sewage Strategy**

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

### **Surface Water and Sewer Flooding**

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

### **Water Quality**

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals



should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

### Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

### Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Chris Bramley

Strategic Catchment Planner

[Redacted signature]

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your Details

Title	Mr				
Name	Robert Galij				
Organisation (if responding on behalf of an organisation)	Barratt David Wilson Homes				
Address	<div>██████████</div> <div>██████████</div> <div>██████████</div> <div>██████████</div>				
Postcode	██████				
Tel. Number	██████████				
E-mail address	████████████████████				

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

<p>Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?</p> <p>Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:</p> <div>████████████████████</div>	<p><b>YES /</b> <input type="checkbox"/></p>
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For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and

Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request. **By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

**1. Which Main Modification does this response relate to?**

(please complete a separate form for each Main **MM**  
Modification that you wish to comment on)

**MM 12**

(Please see consultation document)

**2. Do you support or object to the Main**

Support ☐

Object ☐

**t Modification?**

**3. If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

**4. Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

Concern is expressed over the proposed amendments to Policy 5.1 : East of Church Lane, Brinsley and associated Map 22 : Brinsley Allocation Area for Open Space and Sustainable Drainage System.

Part “3. b)” of Policy 5.1, as amended, is unclear in its requirement for “additional planting” to the south of the housing site “as shown on Map 22”. The latter contains no such designation in the Key nor any reference to “additional planting”. The necessity for and extent of any “additional planting” to the south of the proposed housing site are questioned.

Contrary to Paragraph 5.8 of the supporting text/reasoned justification, it is unclear why the proposed housing needs to be ‘screened’ “to the south” and how this will “reinforce the open vista between the headstocks and the Grade II\* Listed St James the Great Church” ?

In addition, it is unclear from Map 22 what the rationale is for a huge swathe of “Open Space” immediately south of the proposed residential development ? Is this directly attributable to “110 Homes” and, as such, publicly accessible or is it intended to function as part of the proposed SUDs regime ? NB The latter facility will most likely be an engineering operation (attenuation/balancing pond) designed to regulate surface water drainage from the proposed development, particularly in times of peak rainfall. In reality, it will be an offsite engineering feature associated with the housing scheme rather than a ‘public amenity’ and, as such, will not be publicly accessible.

It is unclear how the above stated concerns regarding “additional planting” and “Open Space” to the south of the proposed Housing Allocation accord with Paragraphs 203 – 206 of the NPPF, 2012; Paragraphs 54 – 57 of the NPPF, 2019 and Regulation 122 of the CIL Regulations, 2010.

**This form is available in large print and other formats on request.**

Please use a separate sheet of paper if required.

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Miss
Name	Jenny Sissons MA
Organisation	Brinsley Vision
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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## Questions

Which Main Modification does this response relate to?	MM 12
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>We object to the wording of the Modification because it does not clearly state the position re the SUDS / Open space area  It was clear from the first Modifications, after my submission to the Inspector at the Hearing, that the SUDS area would NOT be a public amenity area. Reasons included Health &amp; Safety issues re children in the proximity of the Attenuation ponds, and the fact that the absence of public and dogs from the area would enhance a wildlife corridor which would stretch from Newstead and Felley to the Erewash Valley reserves.</p> <p>As confirmed by Broxtowe Planning Policy department, Policy 5.1 does NOT say the area will be publicly accessible.  Justification 5.8 also does not mention the area being publicly accessible  An error appears to have been made the Reason For Change column on page 50 of the Modifications report</p> <p>The Policy quite clearly is NOT to have the SUDS area as public amenity space, and we trust the final Stage 2 Local Plan will make that clear.  We support the rest of MM12.</p>

# Main Modifications 13

# Details

Agent (if applicable)

Please provide your client's name	N/a
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Your details

Title	Mr
Name	C & Mrs J Wylie
Organisation	-
Address	<div></div>
Tel. Number	
E-mail address	<div></div>

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	Part 2 Local Plan - Walker Street : Eastwood Site Allocation
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No

<p><b>Reasons for Support or Objection</b></p>	<p>It is noted that there are several amendments - which if carried through are positive to the proposed development.</p> <p>The possible flooding/SuDS aspect onto Garden Road is a great concern. This needs to be carried out seriously as the houses on Garden Road are at a considerably LOWER level than the finished/proposed development. There are a lot of possible/foreseeable drainage problems from 200 homes? Also there was a building ban of approx. 28 years on the proposed site due to the mining in the area - any unforeseen problems located could also be detrimental to the flooding aspects. Great care required by whoever is going to develop the area.</p> <p>It is noted that mention is given to vehicle access from the former school on Lynncroft is intended? Also "sustainable transport measures will be fully utilised to reduce reliance on the private car". This sounds very good on paper - has anyone actually been to the site? The suggested "access point" from Lynncroft is only TWO CAR WIDTHS wide at present? How could/would this be modified - assuming that is part of the plan?</p> <p>There are already parking issues on Garden Road to the degree that it is frequent - especially evening/overnight - to see cars parked on BOTH sides of what is a narrow road. With the addition of further cars (an increase on Lynncroft/Garden Road of at least 200 additional cars - with strong possibilities of more than one car to each home on the new development) this could cause great problems in an emergency situation with Fire/Ambulance vehicles. Garden Road is already used as a "cut through" at certain times of the working day - this may be even worse with the additional development and needs to be planned with great care for the existing residents.</p> <p>The reference to "enhancing the wildlife corridor to the rear of the houses on Garden Road". Whilst this is not specific it would be good to know what this "enhancement" will comprise of. It is greatly appreciated that this is going to be taken into consideration.</p> <p>It is positive that usable walking areas (as are currently the case with the existing and well used public footpath from Garden Road to Walker Street) are to be retained/developed. Also that The Canyons are to be retained.</p> <p>Thank you for listening to our concerns/thoughts.</p>
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# Main Modifications 14

**Genway, Tom**

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**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new

builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



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Registered in England & Wales: no. 748865. Charity no.224168R

# Main Modifications 15

# Details

## Agent (if applicable)

Please provide your client's name	Mr R Evans
-----------------------------------	------------

## Your details

Title	Mr
Name	Nick Baseley
Organisation	IBA Planning Ltd
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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# Questions

Which Main Modification does this response relate to?	Policy 7
Do you support or object to the Main Modification?	Object

## If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	Yes
It doesn't comply with the law	No

<p><b>Reasons for Support or Objection</b></p>	<p>As per our longstanding representations through the Local Plan Review process, the allocations for Kimberley fall short of the number of houses identified for the settlement in the Aligned Core Strategy (ACS).</p> <p>The omission of Eastwood Road Builders Yard (Policy 7.3) is supported on the basis that this is a longstanding historical allocation which has consistently failed to come forward and its delivery cannot be relied upon - as is the reduction in the number of dwellings shown for land south of Eastwood Road (Policy 7.2).</p> <p>The proposed increase in dwellings shown for land south of Kimberley including Kimberley Depot from 105 to 118 homes is not supported. As the Inspector heard at the Examination, little to no evidence has been submitted to provide the Council or the Inspector the necessary comfort that such level of development can be accommodated on the site whilst maintaining character, densities etc.</p> <p>In addition to the above, the Council's approach to housing delivery in Kimberley and the Green Belt Review is not supported.</p> <p>My client's site and adjoining land was specifically recommended to be taken out of the Green Belt and allocated for housing by the previous Local Plan Inspector. It defies logic that this land has not been identified for release from the Green Belt and allocated for housing as part of this Local Plan Review - particularly since this would address the residual concerns over under-allocation relative to the ACS.</p> <p>By persisting with under-allocation for the settlement (in circumstances whereby there are few opportunities for windfall sites within the built-up area - which is further tightly constrained by the Green Belt boundary on all sides), the Plan fails to incorporate sufficient flexibility should any of the sites identified for allocation fail to come forward as envisaged. In this connection, the Inspector heard that there had been a history of sites not coming forward within the main built-up area of Kimberley despite having been allocated in at least two previous Local Plans.</p> <p>Even if all do, there are still residual housing numbers required to meet the ACS figure of 600.</p> <p>In response to such criticism at the Examination, the Council's Mr Saunders appeared to acknowledge the same and suggested that any shortcomings of the Plan in this regard could be remedied at the time the Local Plan is next reviewed in 5 years' time.</p> <p>Such an approach however is, as set out in our LP representations, contrary to national Green Belt policy which advises that when defining Green Belt boundaries, Plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period (para 139e).</p> <p>Quite plainly, this cannot be the case here.</p> <p>In addition to the above, the Plan fails to consider whether it is necessary to keep my client's land and the adjoining land permanently open (in circumstances where the previous Local Plan Inspector recommended it for release) and/or whether my client's land and the adjoining land ought alternatively be identified as safeguarded land to facilitate its consideration for allocation at the time of the next Review.</p> <p>In failing to consider the above and persist with under-allocation within a sustainable settlement that it tightly constrained by the Green Belt (and has a history of previously allocated sites not coming forward), my client continues to object to the Plan on the basis that it has not been positively prepared, the strategy will not meet development needs, the Plan is not effective - and is not consistent with national planning policy.</p> <p>The Inspector will recall my voice was not a lone one in respect of the above concerns.</p> <p>Our objection on these grounds therefore remains and the Inspector is asked to re-visit the approach to housing and Green Belt Review in Kimberley accordingly before concluding on overall soundness.</p>
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# Main Modifications 16

**Genway, Tom**

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**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

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Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

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Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

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Retention of hedges and protection of common toads mentioned in policy wording

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Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

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Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

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We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new



builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

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We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

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We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
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Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



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Registered in England & Wales: no. 748865. Charity no.224168R

# Main Modifications 17

**Genway, Tom**

---

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**Sent:** 09 July 2019 14:26  
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Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



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**Are you a member of Nottinghamshire Wildlife Trust?**

**Join us now online** [REDACTED]

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# Main Modifications 18

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	Bloor Homes Ltd
-----------------------------------	-----------------

## Your Details

Title	Mr	Mrs	Miss	Ms	Other: Mr
Name	Ben Holmes				
Organisation (if responding on behalf of an organisation)	Oxalis Planning Ltd				
Address	[REDACTED]				
Postcode	[REDACTED]				
Tel. Number	[REDACTED]				
E-mail address	[REDACTED]				

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]	

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.  
**By submitting this response form you are agreeing to these conditions.**

## Please return completed forms to:

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

18

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

☒

Object

☐

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

We welcome and support the removal of Policy 7.3 from the draft LPP2 as we did not consider the site to be deliverable during the Plan period

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Main Modifications 19



# Details

Agent (if applicable)

Please provide your client's name	DW and JWE WILD
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Your details

Title	Mr
Name	Mike Downes
Organisation	Aspbury Planning Limited
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	MM19 Housing Trajectory
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>Following our partially successful representations to and appearance at the Broxtowe Local Plan examination sessions on the Kimberley Housing Allocations, there has been a resultant reduction in housing numbers on the land south of Eastwood Road (MM17) and deletion of the Builders Yard MM18. This leaves just two allocations, a reduced housing site that has been previously allocated for many years and a currently completely operational depot which we maintain is not (in part or potentially at all) deliverable in the time scale, together with reliance upon every identified SHLAA site to meet a predicted total delivery of 495 dwellings, substantially short of the 600 dwellings indicated in the adopted Core Strategy.</p> <p>It is very disappointing in that recognising deficiencies in the Kimberley allocations now reduced and deleted, the Council has not sought to identify an additional site within Kimberley. It is considered highly unlikely that all the SHLAA site will deliver the full 250 dwellings and the depot will under deliver also. This will have clear knock on implications for affordable housing delivery also. Inclusion of additional sites, albeit Green Belt, of which our clients site ( SHLAA 113) is one of the sites deemed suitable (if policy changes) could have addressed the overall housing shortfall for Kimberley and secured affordable housing which will not come from other sites below the 10 unit threshold. Furthermore, It will be no surprise down the line if it is announced that the Kimberley Depot is unable to deliver a fully policy compliant affordable housing quantum due to constraints and viability issues.</p> <p>Let us hope that at the forthcoming review, Kimberley is not short changed again.</p>

# Part 2 Local Plan Main Modifications Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name	Bloor Homes Ltd
-----------------------------------	-----------------

## Your Details

Title	Mr Mrs Miss Ms Other: Mr
Name	Ben Holmes
Organisation (if responding on behalf of an organisation)	Oxalis Planning Ltd
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

2 and 19

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

☐

Object

☒

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It is not positively prepared e.g. strategy will not meet development needs

☒

It is not effective i.e. it won't work

☒

It isn't consistent with national policy

☒

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

Please see attached Statement

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



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**BROXTOWE BOROUGH COUNCIL**  
**Local Plan Part 2:**  
**MAIN MODIFICATION 2 and 19.**

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Representations on behalf of  
BLOOR HOMES

July 2019

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## **Contents**

- 1.0 Introduction.**
- 2.0 Representation to Main Modifications: 2 and 19.**

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## **1.0 Introduction**

- 1.1 These representations have been prepared on behalf of Bloor Homes who have a number of land interests in Broxtowe. We have previously made representations to Broxtowe for many years on behalf of Bloor Homes during both the development of the Greater Nottingham Aligned Core Strategies (ACS) and earlier consultation stages of the Broxtowe Local Plan Part 2 (LPP2).
- 1.2 Bloor Homes have serious concerns about the soundness of LPP2, particularly in relation to the approach to housing and the allocation at Toton, and object to the modifications set out. Details of their concerns in respect of housing delivery are set out in these representations. These representations also outline modifications to LPP2 which are considered necessary to make it sound.



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## 2.0 Main Modifications 2 and 19:

### MM2: Changes to the Housing Figures in Table 3 (Policy 2: Site Allocations)

### MM19: Changes to the Housing Trajectory in Table 5

- 2.1 We welcome the Council's approach to increase the housing numbers in the Main Built Up Area, as shown in Table 3, but consider that the proposed supply of sites within the Plan period (2011-28) is not realistic and will therefore not deliver the 6,150 homes required by the ACS. As set out below, we have significant concerns relating to the delivery of the strategic sites and we consider that unless the LPP2 allocates more land and sites within the Plan, LPP2 is not positively prepared, justified, effective or consistent with national policy in accordance with the 2012 National Planning Policy Framework (NPPF), and is therefore not sound.
- 2.2 As previously detailed in our representations to Matters 4, 6, 8 and 9 in November 2018, we consider that the projected completion rates which underline Tables 3 and 5 are unrealistic. The Council are proposing an approach which relies on the delivery of all the large and complex sites with little or no room for further delay, let alone non-delivery of one or more sites. It should be noted that many of these sites have been allocated since 2004 which demonstrates how challenging they are to deliver. Accordingly, the draft LPP2 is unsound as the Council are unable to demonstrate a sufficient number of deliverable sites to meet the ACS requirement.
- 2.3 In particular, there are significant concerns as to the deliverability of the Peveril Homes scheme at Toton (refs. 12/00585/OUT and 17/00499/REM) due to its contrast with competing ambitions for the Toton Strategic Location for Growth allocation. These competing ambitions include proposals detailed in a masterplanning document in September 2017 by the East Midlands Councils (EMC) with endorsement by the D2N2 LEP, the Leicestershire and Leicester LEP, the East Midlands Chamber and the Rail Forum. This document built upon a September 2016 'Emerging Growth Strategy' which set out a vision for maximising the 'economic prize' created by HS2. A further masterplanning document was also produced by EMC in October 2017. Although all these documents promote land at Toton for a mixed-use development they differ in their approach when compared with Policy 3.2 and the Peveril scheme. As the Toton allocation proposes 350 homes within the first 5 years of the Plan period, any reduction in delivery caused by a change in approach to the development of the site would impact on the 5-year supply of the Borough.
- 2.4 We also have significant concerns relating to the Chetwynd Barracks allocation which proposed a highly unrealistic timetable for the delivery of 500 homes within the Plan period. We raised concerns about this in our representations to Matter 6 in November 2018 and there is no evidence to suggest progress has been made since.
- 2.5 Table 5 demonstrates that housing delivery has been poor since the start of the Plan period in 2011/12 and has resulted in the Council being 856 homes short of their cumulative requirement up to 2017/18. The draft LPP2 proposes a stepped trajectory with delivery anticipated to be much higher during the latter half of the Plan period when compared with earlier years. Indeed, over the first 7 years of the Plan, 2011/12 – 2017/18, 1,144 homes were delivered with a peak of 324 homes in 2017/18, however, over the next 7 year period, 2018/19 – 2024/25, the anticipated delivery is 4,706 homes with peaks of over 1,000 homes each year in 2020/21 and 2021/22. Whilst the adoption of LPP2 might be expected to kick-start some additional house building during the few years following adoption, it is wholly unrealistic to expect a more than six-fold increase in delivery based on the Plan as currently

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prepared. Without a greater number of sites which can provide greater 'outlets' and better certainty of delivery, the Plan will not provide the basis for the housing requirements of the Borough to be met.

- 2.6 In the Post Hearing Advice Note, dated 15 March 2019, concerns are raised about the 5-year housing supply of the Borough and the Note details that with changes to the windfall allowance, the Council would only have a 5.2-year supply with a surplus of 150 dwellings. For the reasons we have set out above we do not consider that the land supply position set out in LPP2 is realistic. Notwithstanding it is our view that a 5.2-year supply at the adoption of the Plan, particularly in the light of the challenges to delivery in the Borough, does not provide a sound basis from which delivery can be secured. Indeed, at this level it is inevitable that the Council would quickly be unable to demonstrate a 5-year supply of deliverable sites as required by the NPPF and the Plan would become 'out-of-date'.
- 2.7 In conclusion, unless the Council include more land within the Toton allocation to assist with the delivery of the site and, allocate more sites across the Borough for delivery within the Plan period, LPP2 as set out will not be sound in accordance with paragraph 182 of the 2012 NPPF.

# Broxtowe Borough Local Plan Part 2 Main Modifications

Land at Chilwell Lane,  
Bramcote

Prepared by Fisher German LLP on Behalf of  
Taylor Wimpey Strategic Land

**Project Title:**

Land at Chilwell Lane, Bramcote

**Address:**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Document Author	Version	Date	Approved by	Comments
Angela Smedley MRTPI	A	28/06/19	LAS	

# 01 Introduction

- 1.1 These representations are prepared by Fisher German on behalf of Taylor Wimpey Strategic Land, in respect of their land interests at Chilwell Lane, Bramcote.

# 02 Main Modifications

## **MM4 Policy 3.2:**

### **Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)**

- 2.1 We object to the modification proposed with regards to the increase in delivery within the plan period. The modification is not considered to be justified or effective.
- 2.2 Development at Toton as a Strategic Location for Growth is in accordance with the Aligned Core Strategy. There are clear ambitions for this area and its immediate vicinity, however it is unlikely that these will be realised during the plan period. The amendment to the housing figure expressed as a range (with upper limit being 800) is not considered sound or effective.
- 2.3 An outline planning application for a maximum of 500 dwellings and associated development, was submitted in October 2012 (ref: 12/00585/OUT). It was approved in July 2016.
- 2.4 An application to vary Condition 20 of the outline permission was submitted in March 2017 (ref: 17/00131/ROC) and approved in June 2017. Condition 20 restriction occupation of any dwellings or buildings until works to the M1 J25 and A52 Bardills junction had been implemented and fully operational. The variation sought to remove reference to the M1 J25 works and sought to amend the trigger for implementation of the A52 Bardills junction works to prior to the occupation of the 200<sup>th</sup> dwelling.
- 2.5 A reserved matters application for 282 dwellings was submitted in July 2017 (ref: 17/00499/REM) to the north, and approved in February 2018. No other such reserved matters application have been submitted as yet, nor any further outline of full applications.

- 2.6 Peveril Homes have discharged a number of conditions on the reserved matters site. The remainder of the site with outline planning permission is currently being marketed for sale by JLL.
- 2.7 Partial works to the A52 Bardills junction have taken place though further works in line with the outline permission yet to be undertaken.
- 2.8 The 2017/18 SHLAA and Housing Trajectory (Table 5 of the Plan), sets out that 350 dwellings are projected to be delivered at the Toton Lane site between 2018-2023, and are included in the Borough Council's five year housing land supply calculation. The trajectory sets out that delivery will commence in 2019/2020, this year, with 50 units.
- 2.9 No start on the Peveril Homes site has been made to date. Whilst some conditions have been discharged by the developer, others remain outstanding. The site is not on Peveril Homes' website as 'Coming Soon' akin to other new developments and upon contacting Peveril Homes, they have advised the development is on hold. As such delivery of the development within the projected timeframes, or indeed within the plan period, is highly questionable.
- 2.10 Furthermore, the Peveril Homes development is just 282 of the 800 dwellings earmarked for delivery in the plan period. The development is also restricted by Condition 20 of the outline permission, requiring completed works to the A52 Bardills junction prior to occupation of the 200<sup>th</sup> dwellings. Again, these works are yet to be completed. With the trajectory already slipping for the 350 dwellings projected during the five year period, it is highly likely that the LPA will not be in a position to demonstrate a five year supply of housing upon adoption of the Part 2 Plan.
- 2.11 It has been seven years since the outline planning application was made and yet no houses have been constructed. A start hasn't even been made on the reserved matters (northern parcel) as yet. The southern parcel with outline permission (for the remaining 218 dwellings) is being marketed and thus no reserved matters or full application is forthcoming at this stage.
- 2.12 The additional 300 dwellings to the site allocation, sought through MM4, are furthermore unlikely to be realised in the plan period. Should an outline application be forthcoming even later this year, 2019, anticipating a determination period akin to the initial outline consent of four years, it would not be until 2023 until approval is secured. With a further year before a reserved matters application is submitted (2024) and then determined (2025), there will only be three years left in

the plan period. Conditions will need to be discharged (2026) before a start could be made on site, with delivery at its earliest in 2027/28; the last year of the plan period.

- 2.13 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites will be required to fulfill this requirement.

### **MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

- 2.14 We object to the modification proposed with regards to the increase in capacity of the site. The modification is not considered to be justified or effective.
- 2.15 The amendment seeks an increase to the site allocation from 300 to 500 dwellings. This is not considered sound or effective.
- 2.16 A large proportion of the site is a Local Wildlife Site. Policy 3.3 sets out a number of Key Development Requirements (KDR). KDR 3. b) requires the development to *"Ensure that any loss of the Local Wildlife Site land is mitigated/compensated at equivalent quality within close proximity to its current location."*
- 2.17 Whilst the site size has increased (marginally) through the proposed modification, it is not considered sufficient to accommodate a further 200 dwellings, nor enough to provide adequate mitigation to the loss of the Wildlife Site.
- 2.18 Nottingham Wildlife Trust (NWT) objected to the allocation of 300 dwellings at the site if the entire site was to be developed and the LWS would be lost. Should the LWS be lost, the policy is considered unsound as it is not consistent with local (Policy 17 of ACS) and national policy (NPPF para 118).
- 2.19 NWT sought a modification to the policy that the LWS should not be developed or it should be removed from LWS from the allocation boundary. It is not considered that the proposed modification goes far enough to seek retention of the LWS or removal from the housing allocation. The proposed modification, noted above, seeks that any loss of the LWS will be mitigated/compensated, however NWT are of the view that protection of the sites themselves are

of the upmost importance. Furthermore, the proposed modification worsens the scenario as the quantum of development has increased 66.7%.

- 2.20 The 2017/18 SHLAA and Housing Trajectory (Table 5 of the Plan), sets out that 300 dwellings are projected to be delivered at the Bramcote site between 2018-2023, and are included in the Borough Council's five year housing land supply calculation. The trajectory sets out that delivery will commence in 2020/2021, with 100 units. Delivery of the development within the projected timeframes, or indeed within the plan period, is highly questionable. No planning application has been submitted at this stage. Should an outline application be forthcoming even later this year, 2019, and anticipating a short determination period of one year (2020), followed by reserved matters (2021) and condition discharge (2022), it is unlikely that delivery would occur before 2023/24.
- 2.21 Given the trajectory slippage, it is highly likely that the LPA will not be in a position to demonstrate a five year supply of housing upon adoption of the Part 2 Plan.
- 2.22 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites will be required to fulfill this requirement.

### **MM19 Table 5 : Housing Trajectory**

- 2.23 We object to the modifications proposed in the Housing Trajectory. As set out in our response to MM4 and MM5 it is considered that the projected delivery of a number of developments are highly questionable. The modification is not considered to be justified or effective.
- 2.24 Broxtowe Borough Council is already significantly underperforming in housing delivery. The Housing Delivery Test (2018) confirmed that for each of the past three years that the number of homes required was not met, with a cumulative shortfall over just the three years of 340 dwellings; resulting in a 67% delivery. The Housing Trajectory illustrates the shortfall across the past 7 seven years as being 856 dwellings.
- 2.25 Paragraph 75 of the NPPF (2019) states that to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the HDT



indicates that delivery has fallen below 95% of the LPAs housing requirement over the previous three years, the authority should prepare an action plan in line with national guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.

- 2.26 As delivery has fallen below 85% the requirement, a 20% buffer will be applied to the Council's five-year land supply (NPPF paragraph 73). The presumption in favour of sustainable development is engaged in scenarios where delivery has been less than 75% (as of 2020, currently 25%). If the LPA does not significantly increase its delivery it will be in this position in November 2020. The Housing Trajectory for 2018/19 continues to anticipate its undersupply, with delivery of just 293 dwellings against the annual requirement of 430, thereby increasing the cumulative shortfall to 993 dwellings.
- 2.27 The following year (2019/20), the Housing Trajectory anticipates that it will deliver a surplus to its annual target (430 units), delivering 507 units. However, as discussed in our response to MM4, it is considered that none of the anticipated units from the HS2 Toton site will be realised in the monitoring year. This reduces the anticipated 507 unit supply to 457 units (just 27 over the annual requirement). It is also likely that the projected delivery in the MBA HLAA sites (as increased by the MM) will not deliver as anticipated; thereby continuing the undersupply trend.
- 2.28 In the following year (2020/21), the Housing Trajectory anticipates that the Council will deliver a large surplus to its annual target of 430 dwellings, delivering 1069 units. However, as discussed in our response to MM4 and MM5, it is considered that none of the anticipated units from the HS2 Toton site will be realised in either monitoring year, nor for the Bramcote site. This reduces the anticipated 1069 unit supply by 250 units, to 819 units. This knock-on effect will continue through the trajectory, and the LPA will still not be able to demonstrate a five year housing land supply.
- 2.29 The only way to rectify this issue is to identify and allocate additional housing sites, especially small and medium scale sites that can be brought forward quickly and will assist the LPA in meeting its immediate housing needs. Land at Chilwell Lane, Bramcote is a suitable site for housing development. The site was included in the 2017/18 SHLAA (reference 412) which assessed the site as being suitable if policy relating to Green Belt was changed. The site is contained by development on three of its sides, with only the west being open, agricultural fields. Measuring approximately 3.7 ha the site is capable of delivering 74 dwellings.

- 2.30 When assessed in the Site Allocations issues and Options document (2013) the assessment confirmed that the site could be developed for residential development without strategically affecting the purpose of the Green Belt. The recent development of St John's College to the east further reduces any contribution of the site to Green Belt.
- 2.31 The site lies adjacent to the Main Built-up Area of Nottingham (MBA), has strong public transport links, including bus and tram services, is located within walking distance of numerous services and facilities including a shopping parade, it has no site constraints (other than the Green Belt designation) and can be brought forward for development immediately with delivery of the site contributing to the next five years of the Plan period.
- 2.32 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites are required to fulfill this requirement. It is considered that development sites should be identified and allocated through the Local Plan to ensure that the housing requirement for the plan period will be delivered.

# Details

Agent (if applicable)

Please provide your client's name	Taylor Wimpey Strategic Land
-----------------------------------	------------------------------

Your details

Title	Ms
Name	Angela Smedley
Organisation	Fisher German LLP
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	MM19 Table 5 : Housing Trajectory
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
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It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No

<p><b>Reasons for Support or Objection</b></p>	<p>2.23 We object to the modifications proposed in the Housing Trajectory. As set out in our response to MM4 and MM5 it is considered that the projected delivery of a number of developments are highly questionable. The modification is not considered to be justified or effective.</p> <p>2.24 Broxtowe Borough Council is already significantly underperforming in housing delivery. The Housing Delivery Test (2018) confirmed that for each of the past three years that the number of homes required was not met, with a cumulative shortfall over just the three years of 340 dwellings; resulting in a 67% delivery. The Housing Trajectory illustrates the shortfall across the past 7seven years as being 856 dwellings.</p> <p>2.25 Paragraph 75 of the NPPF (2019) states that to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the HDT indicates that delivery has fallen below 95% of the LPAs housing requirement over the previous three years, the authority should prepare an action plan in line with national guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.</p> <p>2.26 As delivery has fallen below 85% the requirement, a 20% buffer will be applied to the Council's five-year land supply (NPPF paragraph 73). The presumption in favour of sustainable development is engaged in scenarios where delivery has been less than 75% (as of 2020, currently 25%). If the LPA does not significantly increase its delivery it will be in this position in November 2020. The Housing Trajectory for 2018/19 continues to anticipate tis undersupply, with delivery of just 293 dwellings against the annual requirement of 430, thereby increasing the cumulative shortfall to 993 dwellings.</p> <p>2.27 The following year (2019/20), the Housing Trajectory anticipates that it will a deliver a surplus to its annual target (430 units), delivering 507 units. However, as discussed in our response to MM4, it is considered that none of the anticipated units from the HS2 Toton site will be realised in the monitoring year. This reduces the anticipated 507 unit supply to 457 units (just 27 over the annual requirement). It is also likely that the projected delivery in the MBA HLAA sites (as increased by the MM) will not deliver as anticipated; thereby continuing the undersupply trend.</p> <p>2.28 In the following year (2020/21), the Housing Trajectory anticipates that the Council will a deliver a large surplus to its annual target of 430 dwellings, delivering 1069 units. However, as discussed in our response to MM4 and MM5, it is considered that none of the anticipated units from the HS2 Toton site will be realised in either monitoring year, nor for the Bramcote site. This reduces the anticipated 1069 unit supply by 250 units, to 819 units. This knock-on effect will continue through the trajectory, and the LPA will still not be able to demonstrate a five year housing land supply.</p> <p>2.29 The only way to rectify this issue is to identify and allocate additional housing sites, especially small and medium scale sites that can be brought forward quickly and will assist the LPA in meeting its immediate housing needs. Land at Chilwell Lane, Bramcote is a suitable site for housing development. The site was included in the 2017/18 SHLAA (reference 412) which assessed the site as being suitable if policy relating to Green Belt was changed. The site is contained by development on three of its sides, with only the west being open, agricultural fields. Measuring approximately 3.7 ha the site is capable of delivering 74 dwellings.</p> <p>2.30 When assessed in the Site Allocations issues and Options document (2013) the assessment confirmed that the site could be developed for residential development without strategically affecting the purpose of the Green Belt. The recent development of St John's College to the east further reduces any contribution of the site to Green Belt.</p> <p>2.31 The site lies adjacent to the Main Built-up Area of Nottingham (MBA), has strong public transport links, including bus and tram services, is located within walking distance of numerous services and facilities including a shopping parade, it has no site constraints (other than the Green Belt designation) and can be brought forward for development immediately with delivery of the site contributing to the next five years of the Plan period.</p> <p>2.32 For the reasons outlined, we consider that the plan does not contain a supply of housing that can be delivered within the plan period in that it is not justified, not consistent with national policy and not effective, and that additional sites are required to fulfill this requirement. It is considered that development sites should be identified and allocated through the Local Plan to ensure that the housing requirement for the plan period will be delivered.</p>
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# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your Details

Title	Mr				
Name	Robert Galij				
Organisation (if responding on behalf of an organisation)	Barratt David Wilson Homes				
Address	<div style="background-color: black; width: 100px; height: 15px;"></div> <div style="background-color: black; width: 80px; height: 15px;"></div> <div style="background-color: black; width: 60px; height: 15px;"></div> <div style="background-color: black; width: 120px; height: 15px;"></div> <div style="background-color: black; width: 40px; height: 15px;"></div>				
Postcode	<div style="background-color: black; width: 40px; height: 15px;"></div>				
Tel. Number	<div style="background-color: black; width: 150px; height: 15px;"></div>				
E-mail address	<div style="background-color: black; width: 150px; height: 15px;"></div>				

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

**Yes**

☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:

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[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

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Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request. **By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

**1. Which Main Modification does this response relate to?**

(please complete a separate form for each Main **MM**  
Modification that you wish to comment on)

**MM 19**

(Please see consultation document)

**2. Do you support or object to the Main**

Support ☐

Object ☐

**t Modification?**

**3. If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

**4. Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

The amended Housing Trajectory (Table 4) under MM19 is endorsed. In particular, the anticipated numbers/delivery for “East of Church Lane, Brinsley” in FY 2020/21 (45 Dwellings), FY 2021/22 (45 Dwellings) and FY 2022/23 (20 Dwellings) are appropriate.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Main Modifications 23



# Part 2 Local Plan Main Modifications Consultation Response Form




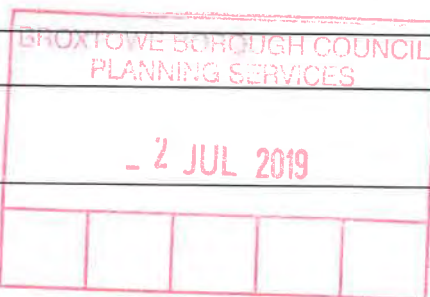
**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr	<input checked="" type="checkbox"/> Mrs	<input checked="" type="checkbox"/> Miss	<input checked="" type="checkbox"/> Ms	Other:
Name	DAVID RHEAD				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					



**All comments must be received by 5pm Tuesday 9 July 2019**

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*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)



1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

23

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☒

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

PLEASE SEE "REASON FOR OBJECTION"  
ON ATTACHED SHEET

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



## ***Background***

### ***Destinations to the south-east***

For destinations such as Beeston train-station, Beeston Recycling Centre & Boots Enterprise Zone:

- A confident cyclist may be OK using Station Road.
  - It's safer for a not-so-confident cyclist to use "Dovecote Lane, then the eastbound NCN 6".
- So – in Item 2(a) on Page 61 – there's a slight contradiction between "safe" and "Station Road".

"Cycling links" should shepherd not-so-confident cyclists towards the cycle-friendly Dovecote Lane rather than towards Station Road.

### ***Destinations to the west***

Tramlines are dangerous for cyclists.<sup>1</sup> So – in Item 2(a) on Page 61 – there's a major contradiction between "safe" and "Middle Street" (since a cyclist naively following Middle Street will end up on the Chilwell Road tramlines).

For destinations such as Chilwell School, Chetwynd Garden Village & Chilwell Retail Park, "cycling links" should:

- dissuade cyclists from following the B6464 (Middle Street, Chilwell Road)
- encourage cyclists to use "Dovecote Lane, West End, Robinet Road, Vincent Avenue, then the westbound NCN 6".

In particular, the **low-impact** "Chilwell (avoiding tram tracks)" signage **after** the junction between Middle Street and Dovecote Lane needs augmenting by **high-impact** signage **before** the junction.

*It shouldn't be necessary for the Civic Society to have to "make a case"*

In theory, according to *Aligned Core Strategies Part 1 Local Plan*, Broxtowe has:

- Policy 14 "Managing Travel Demand"
- Policy 15 "Transport Infrastructure Priorities".

For new developments, both policies advocate shifts to travel-modes other than private car, such as walking and cycling.

If (in practice) Beeston & District Civic Society had to "make a case" for "clear direct safe and attractive pedestrian and cycling links", it suggests that Broxtowe councillors/officers may have forgotten about Broxtowe's own agreed policies (even though the policies are clearly documented in *Aligned Core Strategies Part 1 Local Plan*).

---

<sup>1</sup> For evidence, Google "Roger de Klerk Croydon", "Zhi Min Soh Edinburgh" and "John Melia tram Beeston".



### ***Reason for objection***

In Item 2(a) on Page 61:

- There's a contradiction between "safe" and "Station Road".
- There's a contradiction between "safe" and "Middle Street".

### ***Suggestions***

I suggest the following change to the MM23 text.

- In Item 2 on Page 61, replace  
... links to surrounding areas (including Middle Street and Station Road)  
by  
... links to surrounding areas/destinations, in particular: (i) Station Road (ii) destinations to the south-east via Dovecote Lane and NCN 6 (iii) destinations to the west via Dovecote Lane, West End, Robinet Road, Vincent Avenue and NCN 6.

I also suggest the following amendment to the "reason for change" column.

- In the sentence that's split between Page 61 and Page 62, replace  
... pedestrian and cycling routes in response to representations by Beeston and District Civic Society.  
by  
... pedestrian and cycling routes (a) in line with Policy 14 & Policy 15 of *Aligned Core Strategies Part 1 Local Plan* (b) in response to representations by Beeston and District Civic Society.





# Main Modifications 26

# Details

## Agent (if applicable)

Please provide your client's name	Mark Trought
-----------------------------------	--------------

## Your details

Title	Mr
Name	Mark Trought
Organisation	Private individual
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

# Questions

Which Main Modification does this response relate to?	MM26 and its application to other Policies
Do you support or object to the Main Modification?	Object

## If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	Policy 13 is used in other policies (particularly Policy 3.1 as amended by MM3 Chetwynd Barracks) to imply that retail units will not be granted planning permission if they exceed 500sqm. However, Policy 13 merely states that retail units will be granted permission if they are less than 500sqm and that an impact assessment will be required should they exceed 2,500 sqm. It does not state that planning permission will be denied if the retail units exceed 500sqm. The change made by MM26 leaves an ambiguity about retail units between 500 and 2500 sqm in that they could be granted permission without the need for an impact assessment. This is not what was stated in the previous wording of the Local Plan and may encourage developers to create retail units close to, but less than 2500 sqm when an impact assessment would not be required. I do not believe this was the intention of this policy.

# Main Modifications 28

Broxtowe Borough Council  
Planning Policy  
Chief Executive's Department  
Neighbourhoods and Prosperity  
Foster Avenue  
Beeston  
Nottingham  
NG9 1AB

By email only to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

Dear Sir/Madam,

**Re: Broxtowe Local Plan Part 2 – Proposed Main Modifications**

These representations provide the response of Gladman Developments Ltd (hereafter referred to as “Gladman”) to the above consultation. Gladman has been involved throughout the preparation process of the Broxtowe Local Plan Part 2 (LPP2), having submitted detailed representations to previous stages of consultation.


Gladman have previously raised a number of concerns regarding the policies contained in the emerging LPP2 and consider further modifications are required to ensure compliance with national policy. Accordingly, a number of outstanding objections remain and are still considered relevant. These submissions are focused on the need for further consideration to the following:

**MM28**

Gladman note that the requirement set by criteria 7 which requires development of more than 10 dwellings to provide at least 10% of new dwellings to the optional M4(2) Building Regulations standard has been removed. However, the addition to the text now states that:

“Any applications which propose less affordable housing, fewer ‘accessible and adaptable dwellings’ or fewer self-build or custom build homes than indicated in parts 1,2,3,7 and 8 of the Policy must be accompanied by a viability assessment”

It is therefore not clear given the absence of the criteria in the policy wording whether the M4(2) standards and self-build requirement are still being pursued by the Council and clarity is therefore needed. Gladman previously raised concerns regarding the application of the M4(2) optional building standards. Gladman reiterate the



concerns previously raised as the proposed policy has not been undertaken in line with practice guidance and the justification required to take account the various factors which the PPG refers to<sup>1</sup>. Whilst it is noted that the Council considers an ageing population within the borough this alone does not justify a level of need to implement the optional technical standards.

Furthermore, Gladman note that the Inspector's Post Hearing letter identified that based on available evidence there is no sufficient demand for custom build/self-build homes in the borough at the level being pursued by the Council.

Gladman submit that reference to the optional building standards and the requirement relating to self-build homes should be deleted as they are not soundly based.

#### MM31

The above policy relates to electrical vehicle charging points in all new housing developments of 10 or more houses and commercial developments of 1,000 square meters or more of floor space. Before any such policy is pursued, the Council should have engaged with the main energy suppliers to determine network capacity to accommodate this form of infrastructure. Depending on the type of electrical charging points required, this could cause charging demand to become excessive and there may be constraints to increasing electric loading in the area because of the limited size and capacity of existing cables and new sub-station infrastructure may be required. The cost of such infrastructure may have adverse impacts on the deliverability and viability of development proposals and thus have an impact on the delivery of sustainable development opportunities. It is therefore recommended that flexibility be built into the Plan to ensure that this policy does not result in an approach which is prescriptive and could result in rendering a development proposal unviable. Gladman therefore recommend that the requirement for electric charging facilities is deleted as modified as follows:

**“Development proposals which include electric charging facilities for electric vehicles will be supported.”**

#### **Conclusions**

I hope you have found this response to be constructive. Should you require any further information please do not hesitate to contact me.

Yours faithfully,

John Fleming  
Gladman Developments Ltd

---

<sup>1</sup> PPG ID: 56-007-20150327



# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	isobel greenhalgh
Organisation	town clerk
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	Broxtowe part2 local plan main modifications - MM6
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	Yes
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>Stapleford Neighbourhood Plan Steering Groups Response to the Broxtowe part 2 local plan main modifications MM6</p> <p>The steering group is disappointed that the examiner agreed with Broxtowe Borough Council (BBC) over the allocation of land to the West of Coventry lane being put forward for development. This site is of great ecological significance due to its proximity to varied and valued habitats. We are therefore pleased to see that a key development requirement of providing enhanced green infrastructure corridors has been highlighted as requiring clarification as to the location of these corridors. The Nottinghamshire Biological records centre has very limited data for this site so we therefore request that a wildlife survey be carried out on the site by the Nottinghamshire wildlife trust to ascertain the areas requiring protection.</p> <p>We welcome the inclusion of cycle lanes and a new bus service to the site. We request that the Stapleford N.P. steering group be able to produce the design brief for this site to include these aspects.</p> <p>We also request that this site be put forward as a showcase for carbon neutral development. We acknowledge that many larger developers have failed to make progress towards providing carbon neutral housing but self-build and smaller developers are more likely to provide this. We therefore welcome MM28 which enforces the requirement for a more inclusive housing mix.</p>

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your Details

Title	Mr				
Name	Robert Galij				
Organisation (if responding on behalf of an organisation)	Barratt David Wilson Homes				
Address	<div>██████████</div> <div>██████████</div> <div>██████████</div> <div>██████████</div>				
Postcode	██████				
Tel. Number	██████████████████				
E-mail address	██████████████████				

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***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

**Yes**

☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: ████████████████████

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**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

**1. Which Main Modification does this response relate to?**

(please complete a separate form for each Main **MM**  
Modification that you wish to comment on)

**MM 28**

(Please see consultation document)

**2. Do you support or object to the Main**

Support

☐

Object

☐

**t Modification?**

**3. If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

**4. Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

Proposed changes to Policy 15 : Housing Size, Mix and Choice and supporting text/reasoned justification under MM 28 are endorsed. In particular, the proposed deletion of Part 8 of Policy 15 and Paragraph 15.6 of the supporting text/reasoned justification – in both cases covering self build or custom build housing – are welcomed.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Main Modifications 30

**Genway, Tom**

---

**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awsworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new

builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



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Registered office: The Old Ragged School, Brook St, Nottingham NG1 1EA  
Registered in England & Wales: no. 748865. Charity no.224168R

# Main Modifications 31

Broxtowe Borough Council  
Planning Policy  
Chief Executive's Department  
Neighbourhoods and Prosperity  
Foster Avenue  
Beeston  
Nottingham  
NG9 1AB

By email only to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

Dear Sir/Madam,

**Re: Broxtowe Local Plan Part 2 – Proposed Main Modifications**

These representations provide the response of Gladman Developments Ltd (hereafter referred to as “Gladman”) to the above consultation. Gladman has been involved throughout the preparation process of the Broxtowe Local Plan Part 2 (LPP2), having submitted detailed representations to previous stages of consultation.


Gladman have previously raised a number of concerns regarding the policies contained in the emerging LPP2 and consider further modifications are required to ensure compliance with national policy. Accordingly, a number of outstanding objections remain and are still considered relevant. These submissions are focused on the need for further consideration to the following:

MM28

Gladman note that the requirement set by criteria 7 which requires development of more than 10 dwellings to provide at least 10% of new dwellings to the optional M4(2) Building Regulations standard has been removed. However, the addition to the text now states that:

“Any applications which propose less affordable housing, fewer ‘accessible and adaptable dwellings’ or fewer self-build or custom build homes than indicated in parts 1,2,3,7 and 8 of the Policy must be accompanied by a viability assessment”

It is therefore not clear given the absence of the criteria in the policy wording whether the M4(2) standards and self-build requirement are still being pursued by the Council and clarity is therefore needed. Gladman previously raised concerns regarding the application of the M4(2) optional building standards. Gladman reiterate the



concerns previously raised as the proposed policy has not been undertaken in line with practice guidance and the justification required to take account the various factors which the PPG refers to<sup>1</sup>. Whilst it is noted that the Council considers an ageing population within the borough this alone does not justify a level of need to implement the optional technical standards.

Furthermore, Gladman note that the Inspector's Post Hearing letter identified that based on available evidence there is no sufficient demand for custom build/self-build homes in the borough at the level being pursued by the Council.

Gladman submit that reference to the optional building standards and the requirement relating to self-build homes should be deleted as they are not soundly based.

#### MM31

The above policy relates to electrical vehicle charging points in all new housing developments of 10 or more houses and commercial developments of 1,000 square meters or more of floor space. Before any such policy is pursued, the Council should have engaged with the main energy suppliers to determine network capacity to accommodate this form of infrastructure. Depending on the type of electrical charging points required, this could cause charging demand to become excessive and there may be constraints to increasing electric loading in the area because of the limited size and capacity of existing cables and new sub-station infrastructure may be required. The cost of such infrastructure may have adverse impacts on the deliverability and viability of development proposals and thus have an impact on the delivery of sustainable development opportunities. It is therefore recommended that flexibility be built into the Plan to ensure that this policy does not result in an approach which is prescriptive and could result in rendering a development proposal unviable. Gladman therefore recommend that the requirement for electric charging facilities is deleted as modified as follows:

**"Development proposals which include electric charging facilities for electric vehicles will be supported."**

#### **Conclusions**

I hope you have found this response to be constructive. Should you require any further information please do not hesitate to contact me.

Yours faithfully,

John Fleming  
Gladman Developments Ltd

---

<sup>1</sup> PPG ID: 56-007-20150327





# Main Modifications 32

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<del>Mr</del> <del>Mrs</del> Miss <del>Ms</del> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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For more information including an **online response** form please visit:

[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

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**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

3

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

☒

Object

☐

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM3 - policy 3.1 Chetwynd Barracks

HE Supports the additional information in respect of designated and non-designated heritage assets.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<del>Mr</del> <del>Mrs</del> Miss <del>Ms</del> Other:
Name	ROSAMUND WORRALL
Organisation (If responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

11

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object



3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM 11 - Policy E.1 Land west of Ainsworth

He supports the additional information in respect of Bennerley Viaduct.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr Mrs Miss <del>Me</del> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

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*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

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Yes ☒

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

12

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM12 - Policy S.1 East of Church Lane, Brinsley

H&E supports criteria 4 and the use of 'conserve' instead of 'preserve' in line with NPPF terminology.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input checked="" type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

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*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

32

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM 32 - Policy 23: proposals affecting designated and non-designated heritage assets.

HE supports clarification about assessment of harm in Part 2 and the use of 'conserve' instead of 'preserve' in Part 3 all in line with NPPF requirements and terminology.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr Mrs Miss Ms Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes



Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

38

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM38- Policy 32: Develop Contributions

HE supports the inclusion of criteria 1i in respect of the historic environment, heritage assets and setting.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your Details

Title	Mr	Mrs	<u>Mies</u>	Ms	Other:
Name	MEYL TOPLISS				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICE  
- 1 JUL 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

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*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

37

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☒

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

while I support the modification of Policy 31 as requested by Natural England, I believe this should preclude the inclusion of the Church Lane site for housing development in the Local Plan.

The site is of high ecological value, contains the habitats of protected wildlife, borders a SINC site and nature reserve and is in close proximity to ancient woodland.

The severe damage to the biodiversity of the location which would result from the proposed development is contrary to both this policy and several of the NPPF.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input checked="" type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	MERYL TOPLESS
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	
E-mail address	[REDACTED]

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES  
  
- 1 JUL 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes



Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)



1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM 32  
(Please see consultation document)

2. Do you support or object to the Main Modification?

Support ☒

Object ☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☒

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I agree with the modification which states the need to identify substantial harm to heritage assets and weigh them against any public benefits. I believe that substantial harm would result from development on the Church Lane site to the setting of the Headstocks Heritage site and that this harm has not been identified. A large housing development adjacent to the heritage area would destroy the peace and tranquillity essential to the character and appearance of the asset. As an important element of the D.H. Lawrence Heritage, the Headstocks and nature reserve are visited by a growing number of visitors from as far afield as the U.S.A. The proposed development would inevitably have a very adverse effect on what is one of the Country's most important assets.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.





# Main Modifications 33

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Emma Brook
Organisation	Nottinghamshire County Council
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	MM33
Do you support or object to the Main Modification?	Support

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).	
It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	Public Health welcome the inclusion and promotion of the Healthier Options Takeaway (HOT) merit scheme however a clearer introductory statement and reference to the publication of Nottinghamshire Spatial Planning and Health Framework 2019-2022. <a href="https://www.nottinghamshire.gov.uk/planning-and-environment/planning-and-health-framework/planning-and-health-framework-2019-2022">https://www.nottinghamshire.gov.uk/planning-and-environment/planning-and-health-framework/planning-and-health-framework-2019-2022</a> should be included. The Spatial Planning and Health Framework has involved consultation with partner authorities and organisations, addresses the impact of developments on the health and wellbeing of Nottinghamshire to ensure that health requirements are met. The Framework outlines the use of the Checklist for Planning which includes criteria amongst others that reflect and support Policy 24. In addition the justification for Policy 24 (MM33) should be clearly reference in Policy 26 (MM34) and 27 (MM35).

# Main Modifications 34

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	Not applicable
-----------------------------------	----------------

## Your Details

Title	<b>Mr</b> Mrs Miss Ms Other:
Name	Graham Heal
Organisation (if responding on behalf of an organisation)	Chetwynd: The Toton and Chilwell Neighbourhood Forum
Address	██████████ ██████████ ██████████
Postcode	██████████
Tel. Number	██████████
E-mail address	████████████████████

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?  Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: ████████████████████	<div style="border: 1px solid black; padding: 2px 10px; display: inline-block;"><b>Yes</b></div>
--	--

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

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1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

**3. Policy 3.1**

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

**Yes**

Object

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)  
If you wish to comment on more than one Modification, please use a separate form for each.

1. The modification fully represents the Forum's views regarding this Policy – not least the need to ensure:
  - That the Barracks must be treated as one entity and that a comprehensive and cohesive development is achieved
  - That an overarching Strategic masterplan is created covering the whole site
  - This masterplan needs to be mindful of, and conform to, the masterplan developed for the Strategic Location for Growth – see Policy 3.2
  - The Forum must be engaged in providing input to the development of the masterplan
2. Other additions made to this Policy (such as the retention of Hobgoblin Wood and the need to create attractive links between open spaces) are also fully supported.
3. Overall, we believe this Policy is much stronger and we are very pleased with the changes made.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

**4. Policy 3.2**

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

**Yes**

Object

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

5. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)  
If you wish to comment on more than one Modification, please use a separate form for each.

1. The modification represents the Forum's views regarding this Policy, in particular:
  - The provision of multi-functional green infrastructure corridor to the south of the area
  - That the road infrastructure must take into account the requirements for road access to Chetwynd Barracks
  - That a Strategic masterplan needs to be prepared and include the development expected to be delivered after 2028
  - The Forum must be engaged in providing input to the development of the masterplan
2. Overall, we believe this Policy is stronger and we are pleased with the changes made.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

34. Policy 26

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

Yes

Object

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

6. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)  
If you wish to comment on more than one Modification, please use a separate form for each.



1. The modification fully represents the Forum's views regarding this Policy especially the additional text to para 26.1 that travel plans need to provide details how developments will encourage non-car use though more walking, cycling and use of public transport.
2. Overall, we believe this Policy is much stronger and we are pleased with the changes made.

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Emma Brook
Organisation	Nottinghamshire County Council
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	MM34
Do you support or object to the Main Modification?	Support

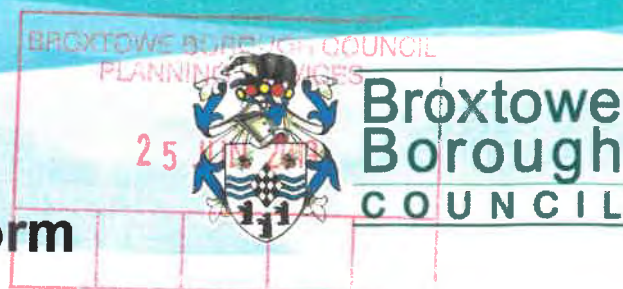
If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).	
It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	Public Health welcome the inclusion and promotion of the Healthier Options Takeaway (HOT) merit scheme however a clearer introductory statement and reference to the publication of Nottinghamshire Spatial Planning and Health Framework 2019-2022. <a href="https://www.nottinghamshire.gov.uk/planning-and-environment/planning-and-health-framework/planning-and-health-framework-2019-2022">https://www.nottinghamshire.gov.uk/planning-and-environment/planning-and-health-framework/planning-and-health-framework-2019-2022</a> should be included. The Spatial Planning and Health Framework has involved consultation with partner authorities and organisations, addresses the impact of developments on the health and wellbeing of Nottinghamshire to ensure that health requirements are met. The Framework outlines the use of the Checklist for Planning which includes criteria amongst others that reflect and support Policy 24. In addition the justification for Policy 24 (MM33) should be clearly reference in Policy 26 (MM34) and 27 (MM35).



# Main Modifications 35

# Part 2 Local Plan Main Modifications Consultation Response Form



Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

## Your Details

Title	Mr <input checked="" type="checkbox"/> Mrs <input checked="" type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other: <input type="text"/>
Name	Atkins
Organisation (if responding on behalf of an organisation)	
Address	[Redacted]
Postcode	[Redacted]
Tel. Number	[Redacted]
E-mail address	

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: _____	

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response form** please visit:

[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

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**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☒

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

THIS IS PART OF OUR  
FLOOD PLAIN  
AND PROTECTS OUR STREET  
FROM FLOODING

THIS AS SOME STATUS  
AS GREEN BELT

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other: <input type="text"/>
Name	BELL
Organisation (if responding on behalf of an organisation)	/
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	/

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

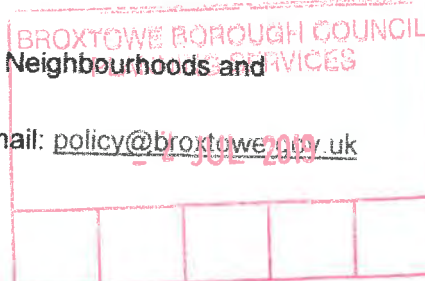
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Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)



1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☒

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

If the Horse Field is not given Local Green Space protection it will be stuck unprotected between Severn Trent development and Leyton Crescent Recreation Ground.  
It should be given local Green Space status and properly maintained and looked after by the local authority. Otherwise it will be left open to future development, which is anything but desirable.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Miss
Name	Sandra Burgess
Organisation	None
Address	[REDACTED]
Tel. Number	
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	MM35 (Main Modification to the Local Green Space)
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>I object to the Local Plan modifications as they don't go far enough, as the old horsefield beside Leyton Crescent park should be designated as Local Green Space.</p> <p>I feel the area should be protected as it is important to wildlife, the trees and hedgerows provide shelter and food for a variety of birds, insects and mammals. Two common buzzards are frequently spotted flying over this area looking for food, yearly the starling murmuration start their journey from here. I have also spotted many other bird species including pheasants and green woodpeckers. The area also provides a sheltered home for mammals such as foxes and a set of badgers which lead onto the allotments.</p> <p>I feel the area has great educational value, with a variety of trees, flora and fauna providing children a safe environment to explore and learn about nature in an accessible space. My children particularly enjoy picking blackberries and collecting the fallen conkers from this area.</p> <p>I feel that the area will become vulnerable to future development if it is not protected and the rich natural diversity of this area will be lost forever.</p> <p>Thank you for taking my views into consideration S. Burgess</p>

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	DONOVAN JOHN CATTELL
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

25 JUN 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]	

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

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**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

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**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

My reasons for objection are in connection with modifications relating to the Cornwall Ave, Beeston, Local Green Space, which did not go far enough. The Old Horsefield was not included, and should have been.

The Old Horsefield should be protected for the following reasons:

- ① It is a natural and wild grassy area which has many benefits for birds and small mammals.
- ② It borders the park, and is a natural extension to both the park and also the Cornwall Ave. LGS.
- ③ It will act as a buffer between Beeston Rylands and the proposed Severn Trent housing scheme, with benefits for both.
- ④ Protection is needed in order that it not become an extension to the housing development by default.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.







# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Miss
Name	Claire
Organisation	N/a
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	No
---	----

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By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	Building in the horses fields at the bottom of Cornwall avenue
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	It isn't needed, or wanted. Building new properties on the old plessey site and at boots, it's getting too tight as it is.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input checked="" type="checkbox"/> Mr <input checked="" type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	MARION COX & ANTHONY COX
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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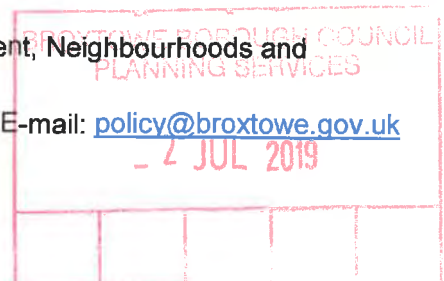
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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

My Husband and I have lived at 109 Leyton Church for over 50 years, where our back garden adjoins the 'Horse Field'. This field has been used for years as a willow through to the Canal, River and now the Heritage Centre. It is also a recognised dog walking route. We request that this field be protected as is the green space up to Cornwall Avenue. If it is not, we shall be in a very vulnerable position. We are both well over 80 and hope we can look forward to having this lovely space within our walking distance for many years to come.



This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

- 9 JUL 2019

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr	Mrs	Miss	Ms	Other: DOCTOR
Name	PAUL DYER				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM **35**  
(Please see consultation document)

2. Do you support or object to the Main Modification?

Support ☐ Object ☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

PLEASE SEE ATTACHED LETTER + MAP.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

6 July 2019

Dear Examination Officer,

I am writing to object to the Main Modification MM35 (Main Modifications to the Local Green Space in the Beeston Rylands area) because the modifications did not go far enough i.e. the Cornwall Avenue local green space should have been extended to include the so-called 'Old Horsefield' as per my attached map (highlighted in yellow), which is located between the Leyton Crescent recreation park and the Severn Trent housing site that has already been approved.

In fact, I already wrote to you in the previous consultation to stress how valuable the green space in the Old Horsefield and adjoining Cornwall Avenue field by the canal was; and had anticipated that the two pieces of land would be dealt with together. Indeed, the Old Horsefield is arguably even more important to be designated as local green space for a number of reasons. For example:

- (1) It is very well used for recreation by local residents. Numerous people use the path through the horsefield and down to the canal daily e.g. dog walkers, youths and general walkers. The site forms a natural extension to the already approved Cornwall Avenue field site, so it would seem a natural extension - especially because for many walkers the two sites are used in a continuous, circular walk. The field has been very heavily used for almost 20 years now since horses were removed from the site and may indeed qualify as a public right of way?
- (2) It provides a very valuable green space between Beeston and the main city of Nottingham. Indeed, with the proposed development on the current Severn Trent Site, in addition to the very large development on the Boots site, the Horsefield will become even more essential and valued as a green space break between Nottingham city and Beeston.
- (3) It is important for wildlife. It provides an area of mixed scrub, tree and hedgerows for local wildlife as well as, critically, providing a key sheltered route for wildlife between the canal/river area and the allotments, gardens and recreation ground in Beeston Rylands. I have taken personal pleasure in seeing wildlife such as hedgehogs, frogs, foxes using the field for passage (although the slugs less welcome!). Given the imminent loss of the Boots (and possibly Severn Trent) sites, this passageway for wildlife will become even more important as a shelter is not easily available through the main Rylands estate or even the recreation ground.
- (4) It is a historic local feature. I gather that the field dates back over 200 years, grazed for much of this time. Such sites are rare in Beeston's urban area and deserve protection.. I believe that the Beeston Rylands Counsellors are investigating the maintenance of the site as a local green space.
- (5) At a practical level, it will provide a break between the proposed development on the Severn Trent site and the Leyton Crescent recreation ground. The latter is frequently used by local football clubs and local residents for play recreation and to be 'hemmed in' by housing on both of the main edges will badly impact on the enjoyment of recreation as well as potentially causing conflict between residents and users of the Leyton Crescent recreational grounds.

I am also aware that the Beeston Rylands CAT, Beeston Wildlife Group and Civic Society have all lobbied for this field to be protected as a natural green space. I would therefore very strongly request that Old Horsefield also be included as a local green space in the revised local plan modifications.

Thank you for your consideration.

Dr. Paul S. Dyer.









# Details

Agent (if applicable)

Please provide your client's name	Jane Evison
-----------------------------------	-------------

Your details

Title	Ms
Name	Jane Evison
Organisation	N/A
Address	[REDACTED]
Tel. Number	
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

Data Protection - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	Old Horsefield beside Leyton Crescent Park Beeston
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	We object to the local plan modifications as they don't go far enough, as the old horsefield beside Leyton Crescent Park should be designated as a Local Green Space. The horsefield needs protecting as it is an historic local feature, is important for wildlife, is well used for recreation, is an accessible strip of countryside between the Rylands and the proposed severn Trent housing site, benefiting both. In addition it has educational value where children can experience and learn about nature in a confined and accessible place, it will be a natural green buffer zone between the Rylands and the proposed severn Trent housing site. It provides a Rurel backdrop to Leyton Crescent Park. It acts as an extension to the park because it is a natural green space linked to the formal playing fields. It will be vulnerable to future development if it isn't protected. Its value to the local community has been repeatedly expressed at Broxtowe council's community action team meetings and during the previous local plan public consultation.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr <input checked="" type="checkbox"/> Mrs <input checked="" type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other: <input type="checkbox"/>
Name	BRIAN JAMES EYRE
Organisation (if responding on behalf of an organisation)	
Address	
Postcode	
Tel. Number	
E-mail address	

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes



Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:

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[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

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Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

MM 35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I object because the modifications did not go far enough the Cornwall are Local green space should have been extended to include The old horsefield This field is a wild life corido. there are many species on it and it should be left for them to breed. I do realize that if and I hope it will be it will need looking after but I am sure there would be volunteers.

Yours Faithfully



This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other: <input type="text"/>
Name	JEAN FOREMAN
Organisation (if responding on behalf of an organisation)	RESIDENT
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

25 JUN 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

mm35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I wish to object because the modifications did not go far enough. i.e. the Cornwall Ave local Green Space should have been extended to include the Old Horsetfield.

It is a historic local feature - a small field over 200 yrs old, grazed for much of the time & still widely known as the "Horsetfield". Historic fields like this & the Cornwall Ave field are rare in Beeston's urban area & deserve protection.

It is important for wildlife & 2½ acres of natural grassland with scrub, trees & hedgerows. It also adjoins the Cornwall Ave field & together they provide a ½ mile strip of countryside stretching from the canal up to Keyton Crescent. This is a valuable route for wildlife & it leads to other habitats including allotments, gardens & park.

See attached sheet!

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



JEAN FOREMAN -

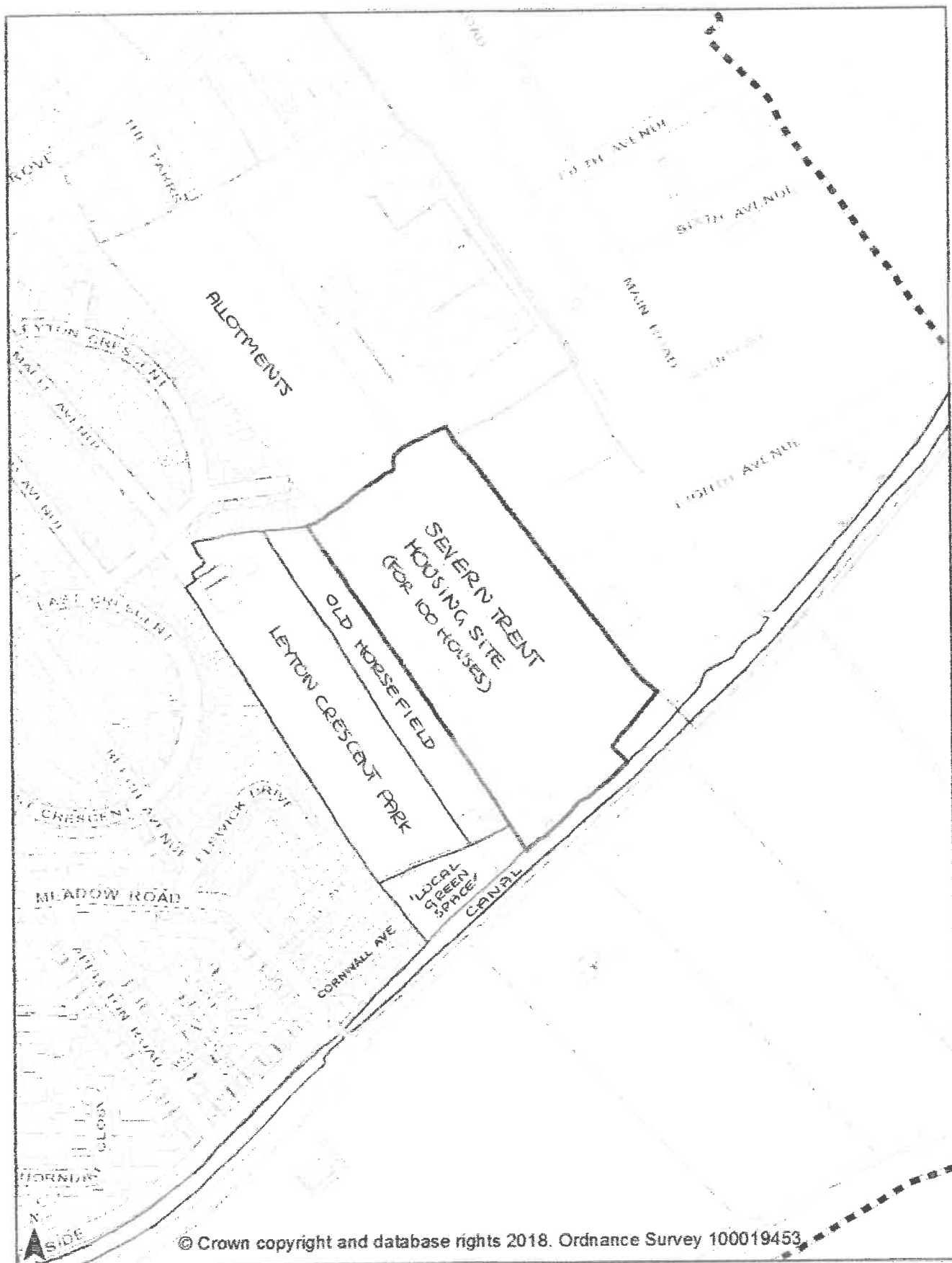
23/6/2019

I have attended C.A.T. Mtgs. over the years & we have been repeatedly told that the old Horsetield would be protected!!

During the previous local Plan public consultation a large number of local residents, plus Beeston Wildlife Group & the Civic Society, & all asked for this field to be protected as a natural Green Space!!

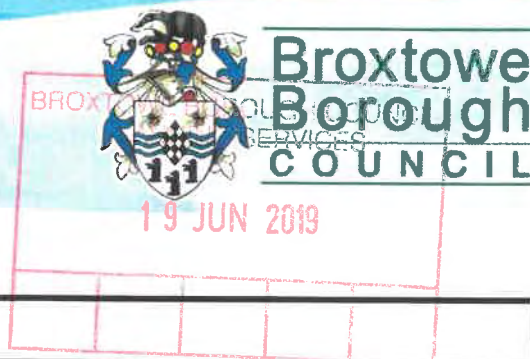
On a personal note the Horsetield has been a big part of my life for the last 47 years as a Cornwall ave. resident & so too to my children & now grandchildren, who run free & hunt for butterflies & birds etc. in the field & it provides & has provided enormous pleasure!!







# Part 2 Local Plan Main Modifications Consultation Response Form



Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr <input type="radio"/> Mrs <input checked="" type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other: <input type="text"/>
Name	Caroline Frazer
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

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**By submitting this response form you are agreeing to these conditions.**

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Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

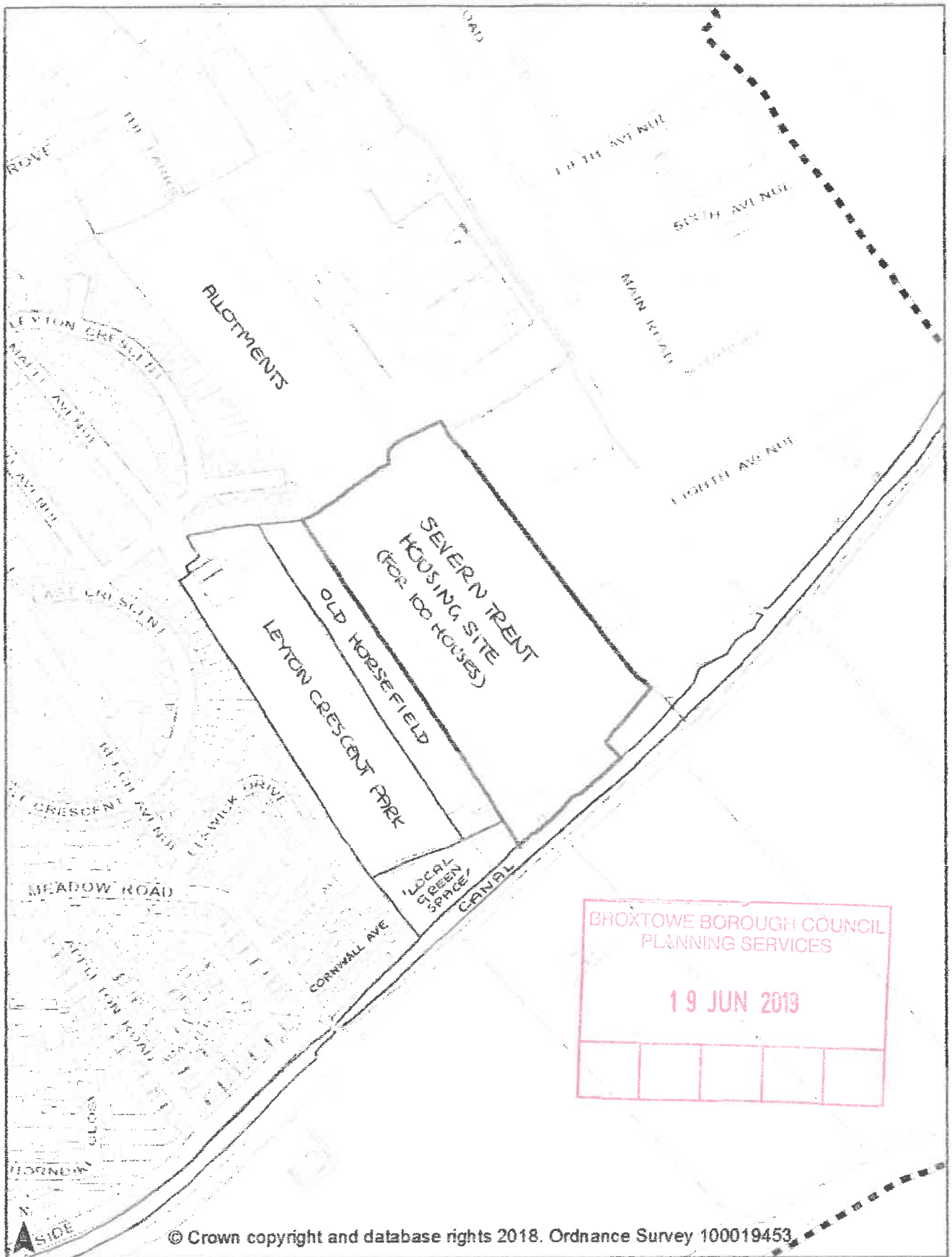
Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I object because the modifications did not go far enough i.e. the Cornwall Ave Local Green Space should have been extended to include the Old Horsefield. The Horse Field is special it is a historic local feature well used daily by locals especially with dogs. The Horse field is an haven for wildlife it joins the Cornwall Ave field together providing a 1/2 mile strip of countryside stretching from the canal up to Keyton Crescent a valuable route for wildlife leading to other habitats i.e. the allotments park and gardens. It is an accessible strip of countryside between the Rylands and the proposed Seven Trent housing site providing a natural green buffer it will be vulnerable to future development if it is not protected.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.







# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	MRS	Mr	Mrs	Miss	Ms	Other
Name	BARBARA GILLES					
Organisation <small>(if responding on behalf of an organisation)</small>						
Address	[REDACTED]					
Postcode	[REDACTED]					
Tel. Number	[REDACTED]					
E-mail address	[REDACTED]					

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

- 9 JUL 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

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**By submitting this response form you are agreeing to these conditions.**

Please return completed forms to:

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AD

For more information: Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

MM 35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

We object to the local plan modifications they don't go far enough, the old homefield should be designated as Local Green Space.

It is 2½ acres of natural grassland with scrub, trees, and hedgerows, it is a valuable route for wildlife and leads to other habitats including allotments, gardens, and park.

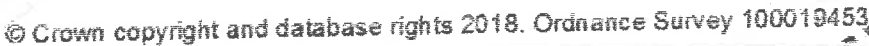
The old Homefield is well used for recreation and together with Cornwall Avenue field up to Leyton crescent and through to the park is a regular route for locals. Birds, Butterflies, wild flowers blackberry picking can all be enjoyed along the way.

If not protected by being a Local Green Space, the homefield could well become an infill site for building more houses.

We do not want to lose the homefield.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.







# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your Details

Title	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other: <input type="text"/>
Name	CATHERINE GLAZEBROOK
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	
E-mail address	[REDACTED]

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

24 JUN 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for **SUPPORT** or **OBJECTION**:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I DO NOT BELIEVE THE MODIFICATION GOES FAR ENOUGH.  
THIS AREA IS A VALUABLE WILDLIFE AREA AND AN AREA ENJOYED BY WALKERS TO AND FROM THE CANAL. THERE ARE SO LITTLE SPACES LIKE THIS NOW AND WOULD BE A TRAGEDY IF LOST. WE MUST KEEP THIS A <sup>LOCAL</sup> GREEN SPACE.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other: <input type="text"/>
Name	SAMANTHA GLEDHILL
Organisation (if responding on behalf of an organisation)	
Address	
Postcode	
Tel. Number	
E-mail address	

**All comments must be received by 5pm Tuesday 9 July 2019**

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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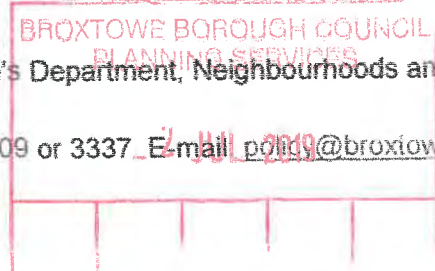
[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

we object to the local plan modifications, as they do not go far enough. The old horsefield beside leyton crescent park should be designated as local green space for the reasons as attached below.

1. It is a historic local feature – a 2 ½ acre field over 200 years old, grazed for much of this time and still locally known as the 'horsefield'. Historic fields like this and the Cornwall Ave field are rare within Beeston's urban area. They deserve protection and need maintaining.
2. It is important for wildlife – almost ½ mile of natural grassland with scrub, trees and hedgerows, stretching from the canalside field up to Leyton Crescent. A valuable route for wildlife, also leading to other habitats such as the allotments, gardens and park.
3. It is well-used for recreation – The horsefield, together with the Cornwall Ave field, provides a 1/2 mile 'rural' walk from Cornwall Ave and the canal up to Leyton Crescent and through to the park. It is a daily route for locals, especially with dogs. Birds, butterflies, wild flowers, blackberries, sloes, and country views are all enjoyed here.
4. It is an accessible strip of countryside between the Rylands and the proposed Severn Trent housing site, benefitting both.
5. It has educational value where children can experience and learn about nature in a confined and accessible place.
6. It will be a natural green 'buffer' zone between the Rylands and the proposed Severn Trent housing site.
7. It provides a rural backdrop to Leyton Crescent park, as the horsefield borders the entire eastern side of the park.
8. It acts as an extension to the park – being a natural green space linked to the formal playing fields.
- 9) It will be vulnerable to future development if it is not protected – Being sandwiched between the park and the Severn Trent housing area it could easily become an infill site for more houses.
- 10) Its value to the local community has been repeatedly expressed -
  - a) At Broxtowe Council's Community Action Team (CAT) meetings locals have repeatedly said they want this field to be protected.
  - b) During the previous Local Plan public consultation a large number of local people, plus Beeston Wildlife Group and the Civic Society,





# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Ms
Name	Wendy Golds
Organisation	none
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	mm35
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	The site known as horsefield, adjacent to Leyton crescent park is an important habitat, with wild plants and animals living there. Sparrows, blackcap, various corvids reside and reside there. At least one pair of buzzards can be regularly seen hunting over the field and in the trees. There is also a bat roost (variety of pipestrelle) with bats flying over the gardens that back onto the field. If the site is not protected all the above would be under threat from future housing development. Beeston wildlife group have already asked for the site to be protected as a natural green space.

# Part 2 Local Plan Main Modifications Consultation Response Form



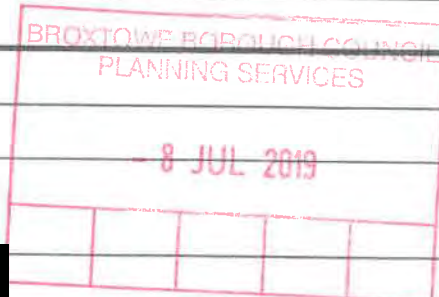
**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your Details

Title	Mr	Mrs	Miss	Ms	Other:
Name	LISA GOODINSON				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					



**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:	

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For more information including an **online response** form please visit:

**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.  
**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 162). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I object strongly because the modifications did not go far enough - the Cornwall Avenue Local Green Space should have been extended to include the old horsefield too. I walk through and enjoy the beautiful rural walk through the horsefield at least once if not twice a day and have done for 20+ years, it has been loved and used by regular walkers, families, dog walkers and is a vital stretch of natural grassland with scrub, trees and hedgerows, this stretch of land is over 200 years old - historic fields like this along with our Cornwall Avenue field are hard to find in an urban area and deserve our full protection, this field provides 2 1/2 acres of habitat for birds and wildlife, butterflies, etc and is a valuable route to other green spaces - i.e. - the park and allotments, it also provides a much needed green stretch of countryside between the Rylands and the proposed Severn Trent housing site which has got to benefit both sides - providing a natural 'buffer zone', it will certainly be vulnerable to future development if it is not protected now. The old horsefield provides a natural extension to Cornwall Avenue's Local Green Space which creates a 4 acre L Shaped Local Green Space. Our community has repeatedly expressed the need to protect this field and keep it as it is - a beautiful, green, natural, historic, well used field enjoyed by people of all ages - children, walkers/dog walkers and I personally hope it stays that way forever, the Beeston Wildlife Group and the Civic Society have also asked for this horsefield to be a natural green space that is protected as deserved. Myself, my family, my dogs, friends and neighbours would be heartbroken to see this field taken

This form is available in large print and other formats on request. away from us,

P.S. Sorry for the messes - Please use a separate sheet of paper if required.

my dogs sat on the form!

Please leave it alone and protect it from the developers now



Broxtowe  
Borough  
COUNCIL

# Part 2 Local Plan Main Modifications Consultation Response Form

Agent (if applicable)

Please provide your client's name
-----------------------------------

## Your Details

Title	Mr	Mrs	Miss	Ms	Other:
Name	FERGUS GORDON				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

Broxtowe Borough Council  
PLANNING SERVICES  
- 5 JUL 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: _____	

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM 33  
(Please see consultation document)

2. Do you support or object to the Main Modification?

Support ☐

Object ☒

3. If you object it will help if you can say why

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It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

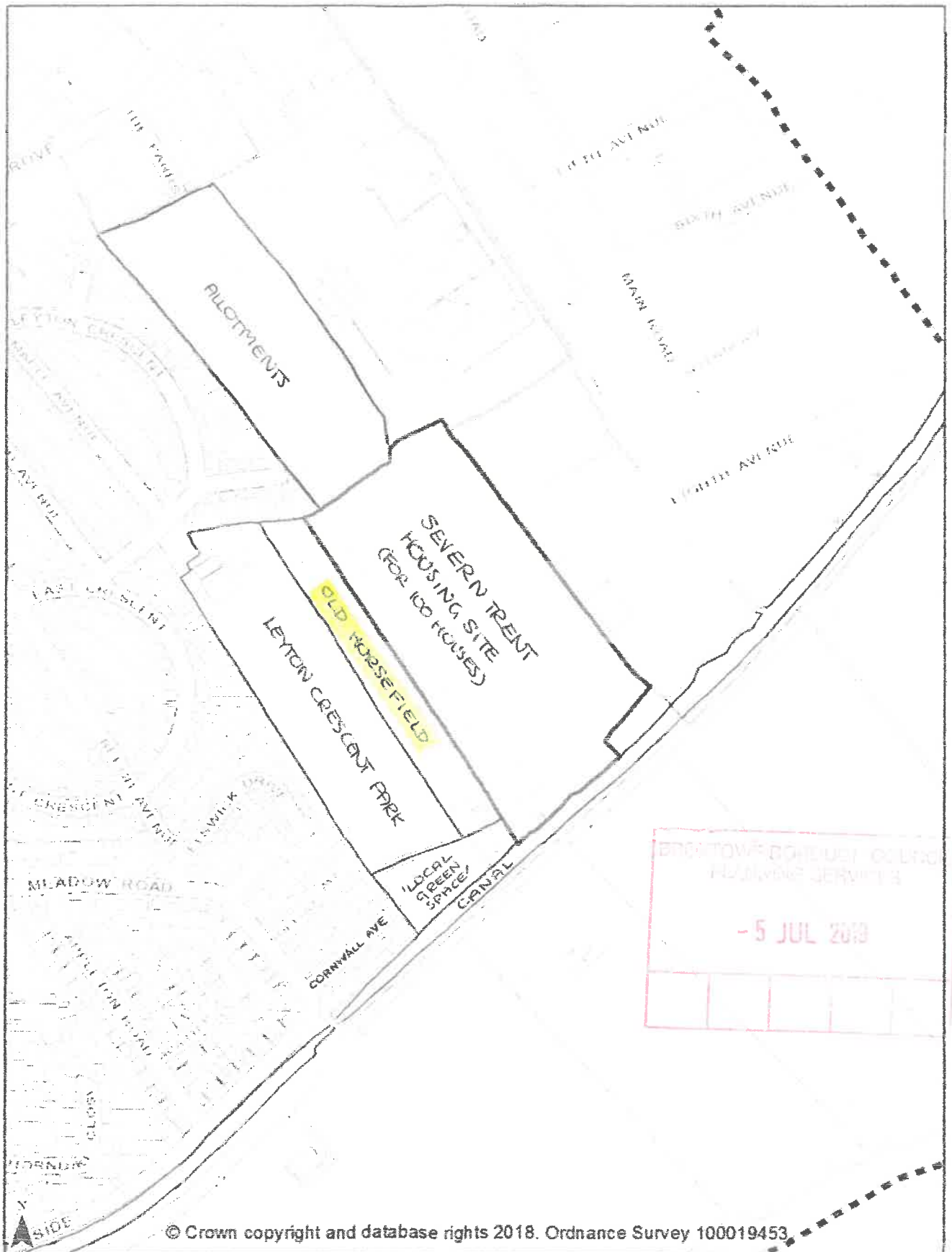
Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

- Historic Local Feature
- Important for wildlife as habitat and route from canal
- Recreation - Walking, Blackberries, Sloes
- Educational
- Natural green buffer between Rylands & proposed Severn Trent housing
- Its value has repeatedly been expressed at CAT meetings & previous Local Plan consultation

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.





# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

20 JUN 2019

Your Details

Title	Mr	Mrs	<u>Miss</u>	Ms	Other:
Name	THERESA GORMAN				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

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☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I object because the modifications did not go far enough, i.e. the Burnwall Ave local Green Space should have been extended to include the old horsefield.

Myself and my family regularly walk through the horsefield and I think it's important for the wildlife. It has natural grassland with scrub, trees and hedgerows. I think it's a valuable route for wildlife and it leads to other habitats including the allotments, gardens and park. I think it's imperative to keep the horsefield when so much land nearby is being used for housing and nearby homes and wildlife will be negatively

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Please use a separate sheet of paper if required.

affected.





# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

- 9 JUL 2019

Your Details

Title	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other: <input type="text"/>
Name	HEATHER GROVES
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

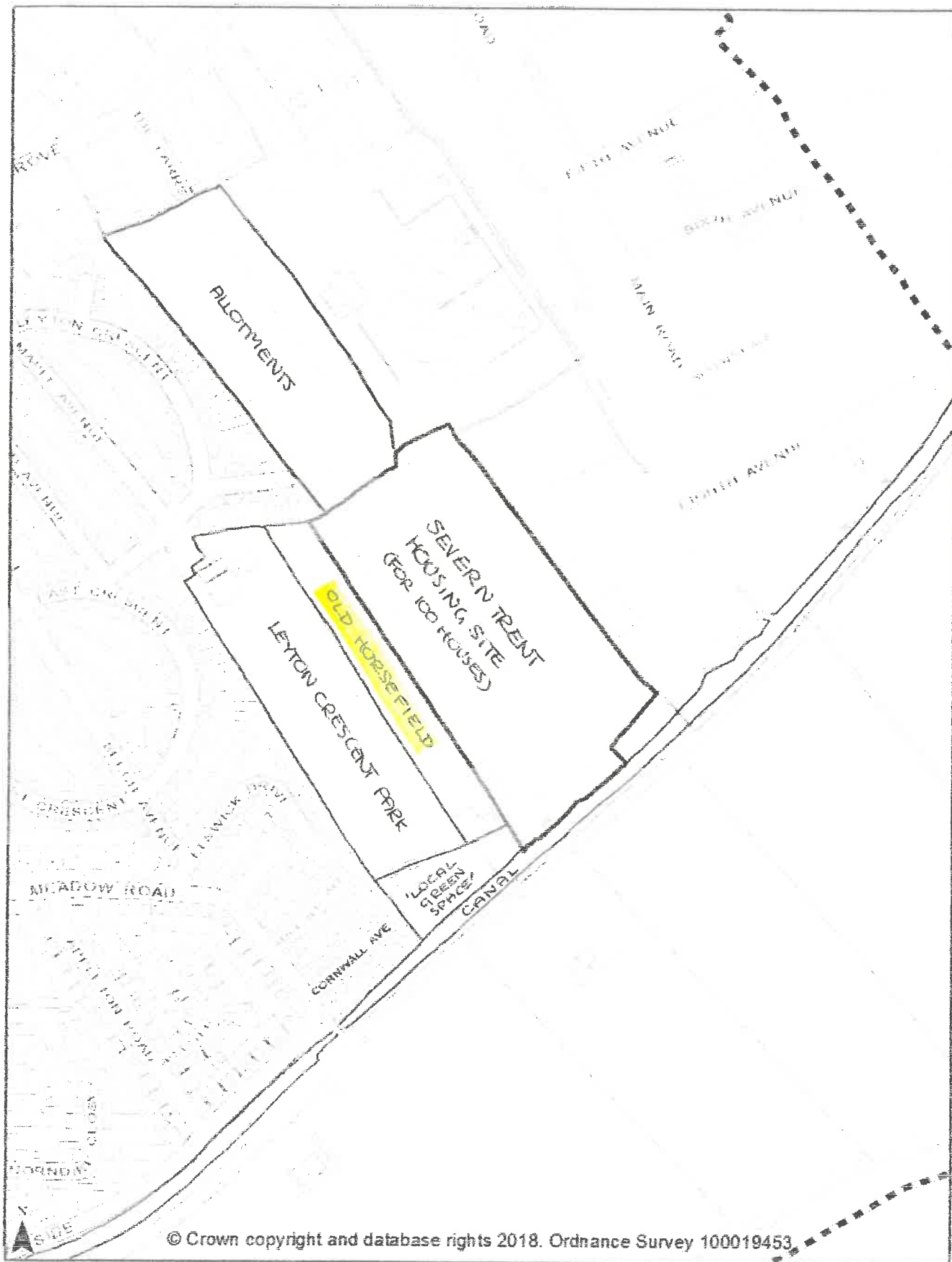
Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I object to the Local Plan modifications as they don't go far enough. I believe that the old horsefield (see attached map) should be designated as a LOCAL GREEN SPACE. As far as I'm aware this field is extremely old and has been grazed on for much of this time. I know that this field is widely used by walkers / dog walkers. It is a haven for wild flowers and birds and forms a natural extension to Cornwall's Local Green Space and Leyton Crescent Park. It is an ideal natural green "buffer" zone between the Rylands and the Severn Trent housing site. Please make this field a LOCAL GREEN SPACE.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.







# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="text"/> Other:
Name	NICHOLAS GROVES
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES**  
- 3 JUL 2019

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*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]	

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification

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It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

THE OLD HORSEFIELD SHOULD BE DESIGNATED A LOCAL GREEN SPACE AS IT IS A STRIP OF LAND IMPORTANT FOR WILDLIFE AS IT CONTAINS GRASSLAND, TREES + HEDGEROWS. ADJOINING THE CORNWALL AVENUE FIELD (DESIGNATED LGS) IT IS A VALUABLE ROUTE FOR WILDLIFE AND JOINS UP WITH OTHER LOCAL HABITATS, THE ALLOTMENTS, GARDENS AND PARK.

IT IS A NATURAL "GREEN" BUFFER ZONE BETWEEN THE RYLANDS AND THE STWA HOUSING ESTATE. IT WILL BE VERY VULNERABLE TO FUTURE DEVELOPMENT IF NOT DESIGNATED LGS.

IT IS A WELL-USED RECREATIONAL AREA USED DAILY BY DOG-WALKERS AND WALKERS ENJOYING THE BIRDS, BUTTERFLIES, WILD-FLOWERS ETC.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.





# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

## Your Details

Title	Mr <u>Mrs</u> Miss Ms Other:
Name	Glynis Harris
Organisation (if responding on behalf of an organisation)	
Address	
Postcode	
Tel. Number	
E-mail address	

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

**Yes** ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:

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1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM 35  
(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support ☐

Object ☒

3. **If you object it will help if you can say why**

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It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

PLEASE SEE ATTACHED. (4 sheets)

- written objection
- aerial photo of site location referred to
- photos to illustrate the site referred to

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



10 JUL 2019

## REASON FOR MY OBJECTION:

### THE MODIFICATIONS MADE TO THE LOCAL GREEN SPACE POLICY DID NOT GO FAR ENOUGH - THE OLD HORSEFIELD BESIDE LEYTON CRESCENT PARK SHOULD HAVE BEEN DESIGNATED AS LOCAL GREEN SPACE

I feel very strongly, as do many local people, that the Local Green Space in Beeston Rylands should have been extended to include the old horsefield beside Leyton Crescent park. During the last public consultation, in 2017, a large number of us asked for both the horsefield and the adjacent Cornwall Avenue field to be protected. As a result of this the Cornwall Avenue field was deservedly designated as Local Green Space, but the old horsefield was not. The two fields form a pair - both being former grazing land and both now renaturalised grass with trees, shrubs and mature hedgerows. The two fields are linked on the ground via a footpath, and are also linked by their history. Each has its own special qualities, but they also complement and enhance each other, together creating a little green corridor stretching from the main canal/Trent corridor right up to Leyton Crescent, used constantly by both people and wildlife.

### The horsefield meets all the requirements for Local Green Space in the National Planning Policy Framework (NPPF)

The revised NPPF (paragraph 100) says that to qualify as Local Green Space a site must be "a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land". The horsefield meets all these criteria, as follows:

1. **It is a historic local feature** – a long, narrow 2 ½ acre field, well over 200 years old, grazed for much of this time and still widely known locally as the 'horsefield'; It is part of our local heritage. Historic fields like this and the Cornwall Avenue field are rare within Beeston's urban area. They deserve protection and need maintaining.
2. **It is important for wildlife** – an almost ½ mile corridor of natural grassland with scrub, trees and mature hedgerows, stretching from the canalside field and the canal/Trent corridor, up to Leyton Crescent. It is a valuable route for wildlife, also leading to other habitats such as the allotments, park and surrounding gardens which is important for biodiversity. Species seen following this route have included green woodpeckers, sparrow hawks and bats (all listed as of 'conservation concern' in NBAP – the Nottinghamshire Biodiversity Action Plan). Tracks and tunnels through the grass suggest various mammals also use this route, as do many butterflies and moths.
3. **It is well-used for recreation** – The horsefield, together with the Cornwall Avenue field provides the peace and quiet of a 1/2 mile 'rural' walk from Cornwall Avenue and the canal up to Leyton Crescent and through to the park. It is a well-loved route used daily by locals, especially with dogs. Birds, butterflies, wild flowers, blackberries, sloes, and country views are all enjoyed here. A popular circular walk combines the horsefield with the Cornwall Avenue field and the park.
4. **It is a little strip of accessible countryside between the Rylands and the proposed Severn Trent housing site** which will benefit both. Broxtowe's Core Strategy Policy 16 (Justification 3.16.6) defines these benefits saying that "one of the key issues ... identified through the development of the Aligned Core Strategies is the poor access for many residents into the surrounding countryside. Improving access into the countryside and to other Green Infrastructure assets will encourage a healthy lifestyle and contribute to health improvement through increasing physical activity and improving mental wellbeing".
5. **It has educational value** where both adults and children can experience and learn about nature in a confined and accessible place.
6. **It will be a natural green 'buffer' zone** between the Rylands and the proposed Severn Trent housing site.
7. **It forms the characteristic rural backdrop to Leyton Crescent park**, as it borders the full length of the park.
8. **It acts as an extension to the park** – This natural green space offers the opportunity for informal leisure linked to the formal playing fields.
- 9) **Its value to the local community has been demonstrated** by its well-worn paths, and also by groups of local people (including myself) forming working parties from time to time to clear the paths when they become overgrown in summer so we can continue walking there. We will be clearing the paths again shortly.
- 10) **Its value to the local community has been repeatedly expressed -**
  - a) At Broxtowe Council's Community Action Team (CAT) meetings locals have repeatedly said they want this field to be protected.
  - b) During the 2017 Local Plan public consultation a lot of local people, including the Civic Society and many members of Beeston Wildlife Group, submitted representations asking for this field to be protected as natural green space.  
(when the Part 2 Local Plan was submitted to the inspector, I feel it may not have been clear how many locals were asking for the horsefield to be protected ... 38 of the representations asking for the horsefield to be designated as Local Green Space were listed as "representations for policy 3.5" (relating to the Severn Trent housing site) Only 7 of them were in the section entitled "representations for policy 27" relating to Local Green Space. It may have therefore looked like there were only 7 asking for the horsefield to be protected)  
as local Green Space



### Protecting the horsefield as a natural green space would be in accordance with Broxtowe's Local Plan:

Together with the playing fields, allotments, Cornwall Ave field, and the surrounding gardens, the horsefield is an important part of a multi-functional green corridor such as that described by Broxtowe's Core Strategy Policy 16. This Policy emphasises the importance of protecting and enhancing such local green corridors, as follows :

#### Part 1 LOCAL PLAN (Core Strategy)

**Policy 16 para 1** This policy says Part 2 Local Plans should protect "Green Infrastructure ...corridors and assets of a more local nature"  
(*The horsefield is part of a green corridor of a local nature*)

**Policy 16 para 2(a)** requires that " existing and potential Green Infrastructure corridors and assets are protected and enhanced. Priority for the location of new or enhanced strategic Green Infrastructure will be given to locations for major residential development identified in Policy 2, the Strategic River Corridors of the Trent, Erewash and Leen rivers, canal corridors ... "

(*The horsefield seems to meet these requirements as it is part of a multi functional green corridor which is linked to the main canal/Trent corridor, and adjacent to the major housing development proposed on the Boots/Severn Trent land.*)

**Policy 16 para 3.** requires Green Infrastructure corridors and assets to be as inclusive as possible, multifunctional and look to make provision for more than one of the following: a) access to employment and leisure facilities and to Green Infrastructure corridors or assets and the countryside; b) physical activity and wellbeing opportunities for local residents such as formal sports provision; c) educational resource for local residents; d) biodiversity opportunities; e) tackling and adapting to climate change; f) enhancement of landscape character; g) protection or enhancement of heritage assets; and h) opportunities for sustainable leisure and tourism.

(*The horsefield is part of a green corridor which meets these requirements*)

**Policy 17 para 1.** Biodiversity will be increased over the plan period by: a) protecting, restoring, expanding and enhancing existing areas of biodiversity interest, including areas and networks of habitats and species listed in the UK and Nottinghamshire Biodiversity Action Plans;  
(*The horsefield is part of a network of habitats, as described above, and contains species listed in the NBAP*)

#### PART 2 LOCAL PLAN

**Policy 3.5** This Policy specifies that the Severn Trent housing site must "Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath and ensure that the management of the Green Infrastructure is secured "  
(*The horsefield provides exactly that, and it already exists, It is not on the Severn Trent site itself, but is immediately adjacent to it, and seems to meet the requirement perfectly.*)

#### MY REQUEST

I ask that the horsefield be designated as a Local Green Space, and then maintained for the use and benefit of the local community, alongside the recently designated field at the end of Cornwall Avenue. If it is not protected, it will be very vulnerable to future development; being sandwiched between the park and the Severn-Trent housing area, it could easily become an infill site for a road or more houses.

#### PROTECTING THE HORSEFIELD AS A LOCAL GREEN SPACE WOULD BE JUSTIFIED AND EFFECTIVE

Protecting the old horsefield as a Local Green Space would be thoroughly justified as doing so would be effective in meeting and delivering requirements of the Broxtowe Local Plan and the NPPF as shown above.





LOCATION OF THE  
OLD HORSEFIELD  
BEESTON RYLANDS.

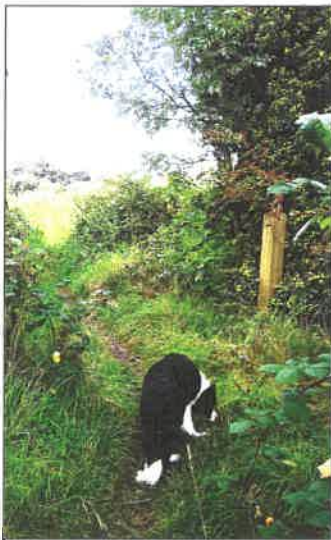






well worn paths and country views.

## THE HORSEFIELD



Gateway linking  
cornwall Ave field  
and horsefield



Regular walkers on  
the horsefield



well worn paths in all seasons  
on the old horsefield – showing much use.





# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr Mrs Miss <b>Ms</b> Other:
Name	Diane Hembury
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

- 8 JUL 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes



Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an online response form please visit:

**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.

**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

For more information: Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

mm mm35  
(Please see consultation document)

2. Do you support or object to the Main Modification?

Support ☐

Object ☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☒

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

We are building houses on the old  
piessey site as well as the  
Boots site. There will be a  
mass growth in congestion, the  
area will not have ~~at~~ enough  
school places, access to health  
care and less green spaces.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input checked="" type="radio"/> Mr	<input type="radio"/> Mrs	<input type="radio"/> Miss	<input type="radio"/> Ms	Other:
Name	Phup Hound				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

We object to the Local Plan modifications as they don't go far enough, as the old horsefield beside Leyton Crescent park should be designated as Local Green Space.

- ① Children can learn about nature first hand in this green oasis... among the half mile strip of countryside, birds, wild flowers, blackberries and ~~the~~ sloes can be found.
- ② A local historical feature that needs protecting & maintaining
- ③ A natural green buffer between the Rylands & the proposed Severn Trent housing site.
- ④ It has been expressed several times that 'Old Horsefield' has value to the local community by groups including CAT, Beeston Wildlife group and the Civic Society.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Luke Hudson
Organisation	Mr
Address	[REDACTED]
Tel. Number	
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	MM35 (Main Modification to the Local Green Space)
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>We object to the Local Plan modifications as they don't go far enough, as the old horsefield beside Leyton Crescent Park should be designated as Local Green Space. The area is important for wildlife and is valuable route and link between the river, fields, canal, allotments, garden and park. There are regular sightings of birds of prey hovering.</p> <p>This is a recreational green space for locals. This will be needed, and used, even more with building of so many new houses within the area. Children, including my own, love to explore this area and find the wildlife. These spaces are vitally important for the mental health and wellbeing of everyone.</p> <p>This area needs to be protected and will be vulnerable to future development if it is not protected</p>

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other: <input type="text"/>
Name	ANN HUFFER
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

Object

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

It is not positively prepared e.g. strategy will not meet development needs

It is not effective i.e. it won't work

It isn't consistent with national policy

It doesn't comply with the law

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

My concerns for the 'Horses field' are as follows,  
Not only is it a space for wild life, I am talking, Sparrow Hawks, Buzzards, foxes, Rabbits, Robins, wrens, magpies, crows, Thrushes, just to name a few, It is also a space that is used by the community to walk their dogs, The trees & bushes that have been growing there are vital to wild life as well as the area, If you allow any changes that are in a negative way to the use the community and wild life then you are not taking the local needs into consideration.  
At a time when we should be looking out for wild life, it would be wrong to ignore their needs and put them before all money issues,

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

2 JUL 2019

Please provide your client's name

## Your Details

Title	Mr	Mrs	Miss	Ms	Other:
Name	MR J. HUNDLBY				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I OBJECT TO THE LOCAL PLAN MODIFICATION,  
WEVE LOST FAR TOO MUCH GREEN SPACE  
AS IT IS,  
ONCE ITS GONE, ITS GONE FOREVER.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	William Hunter
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

- 9 JUL 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

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**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM 35  
(Please see consultation document)

2. Do you support or object to the Main Modification?

Support ☐

Object ☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

We object to the local Plan modifications as they don't go far enough, as the old horsefield should be designated as Local Green Space.

The Old horsefield needs to be protected for a number of reasons:

1) It is a historic local feature. The field has been there for over 200 years and has been grazed for much of this time. Areas such as this need to be protected in Beeston's urban area.

2) The area is crucial for wildlife. The area provides habitat for a range of species.

3) The area provides great recreation opportunities for local residents. The ½ mile walk is regularly used by residents + visitors, showcasing wildlife, wildflowers, and country views.

4) It is an accessible educational area for local school children to provide valuable experiences of rural areas.

\* See Continuation sheet. \*

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.





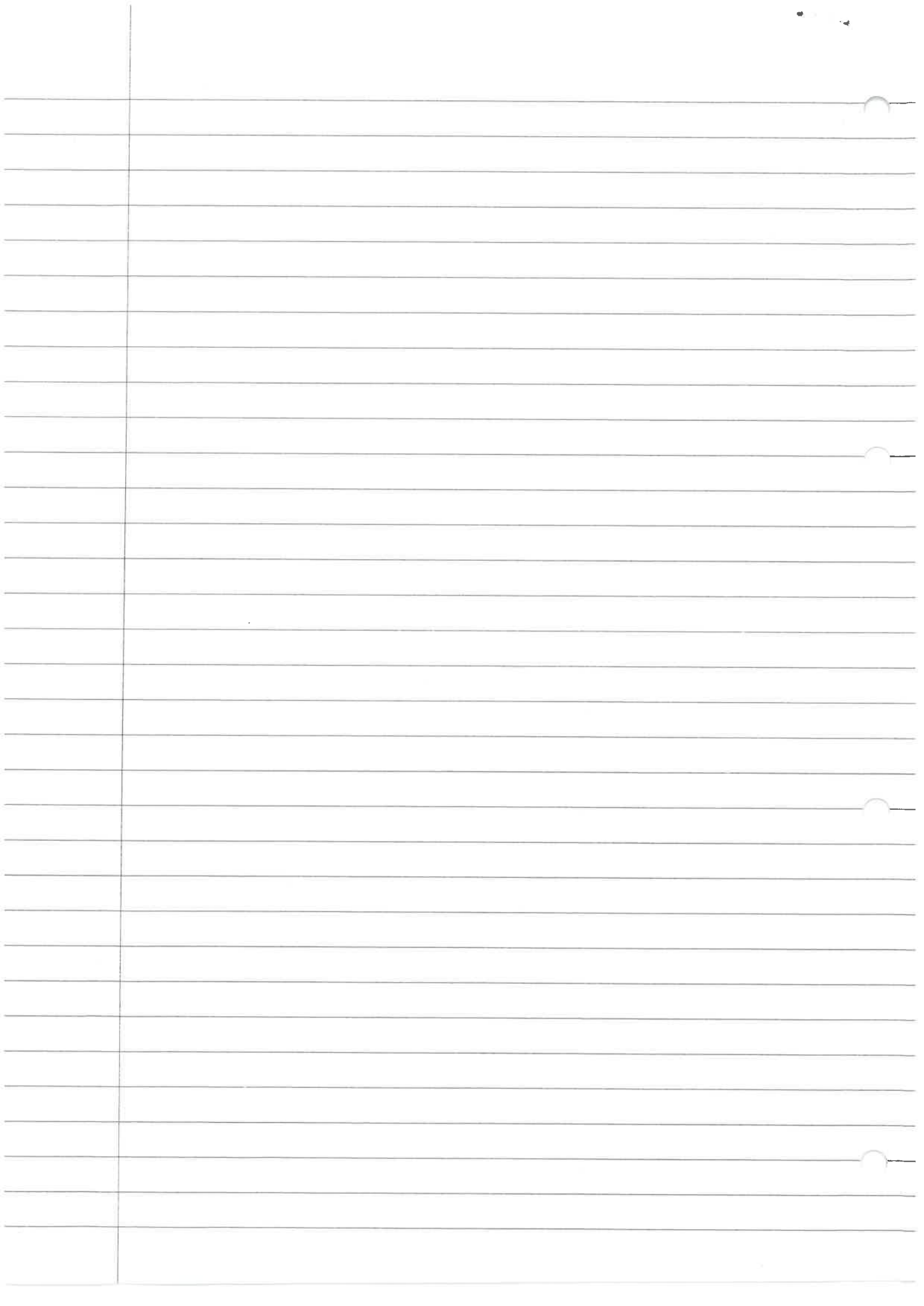


5) It is a natural green buffer between Beeston Rylands + the Severn Trent development site.

6) It acts as an extension to the park, provide more valuable green space.

7) It is very vulnerable to future development, if the space isn't protected.

8) Its value to the local community has been expressed repeatedly. Both at Broxtowe Councils C.A.T meetings + previous local plan public consultations local people have repeatedly expressed that they want this area of land protected. This view has been supported by Beeston Wildlife Group and the Civic Society.



# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Adrian Hirst
Organisation	Local Resident
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	No
---	----

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By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	MM35 Main Modification to the Local Green Space
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	I object to the Local Plan Modifications as the Old Horsefield beside Leyton Crescent Park should be designated as Local Green Space for the continuation of over 200 years of Local Community Recreational Usage.

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Derek Huskisson
Organisation	None
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	Response to MM35 (policy 27 relating to Local green space)
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>I feel than the adjacent horse field running to the north of the land to the 'east of Cornwall Avenue' and to the east of the recreation park (mentioned on ID27.2 -- shown on the maps in the policies changes, but unlabelled-- it lies between maps ID18 &amp; ID22) should also be included in the Local Green Spaces plan.</p> <p>It seems to have been used as pasture for many years. This type of land is disappearing from the Nottingham area, much has been turned into arable land or sports pitches. Retention would be valuable.</p> <p>The land is of some wildlife value -- Ringlet butterflies are abundant here. Nesting areas for the commoner birds, Blackbird, Chaffinch, Song Thrush and sometimes Blackcap and Common Whitethroat.</p> <p>Much of Beeston Rylands is scheduled for being built on or is already built on.</p> <p>However the are some drawbacks dog fouling, fly tipping and possible occupation by travellers. Maybe dog bins on Cornwall Avenue and at the north end would help with the dog fouling. A change of mowing regime to allowing the grass and other vegetation to grow and cutting wide paths through the land to enable access, would maybe deter itinerants. As for the fly tipping?? no ideas.</p>

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Jane
Organisation	None
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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## Questions

Which Main Modification does this response relate to?	mm35 Main Modification to the local green space
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	WE OBJECT TO THE LOCAL PLAN MODIFICATIONS AS THEY DON'T GO FAR ENOUGH, AS THE OLD HORSEFIELD BESIDE LEYTON CRESCENT PARK SHOULD BE DESIGNATED AS LOCAL GREEN SPACE

# Part 2 Local Plan Main Modifications Consultation Response Form

BROXTOWE BOROUGH COUNCIL  
RECEPTION

- 7 JUL 2019

RECEIVED & VERIFIED



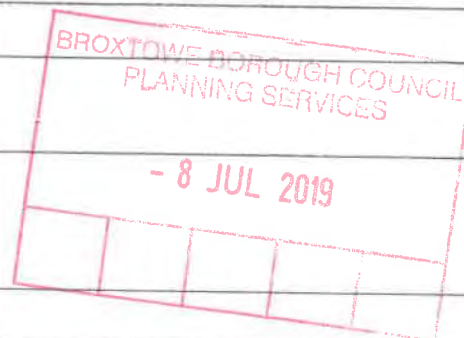
**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your Details

Title	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other: <input type="text"/>
Name	JACKIE JONES
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]



**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: _____	

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM 35  
(Please see consultation document)

2. Do you support or object to the Main Modification?

Support ☐

Object ☒

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

We object to the local plan modifications as they don't go far enough, as the old horsefield should be designated as local green space.

It is a historic local feature - a small field over 200 years old, grazed for much of this time and still widely known as the 'horsefield'. It has educational value where local children can experience and learn about nature in a confined and accessible space.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.





# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr <input checked="" type="checkbox"/> Mrs <input checked="" type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other: <input type="checkbox"/>
Name	R. G. Wlayd
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

- 8 JUL 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

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It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

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Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

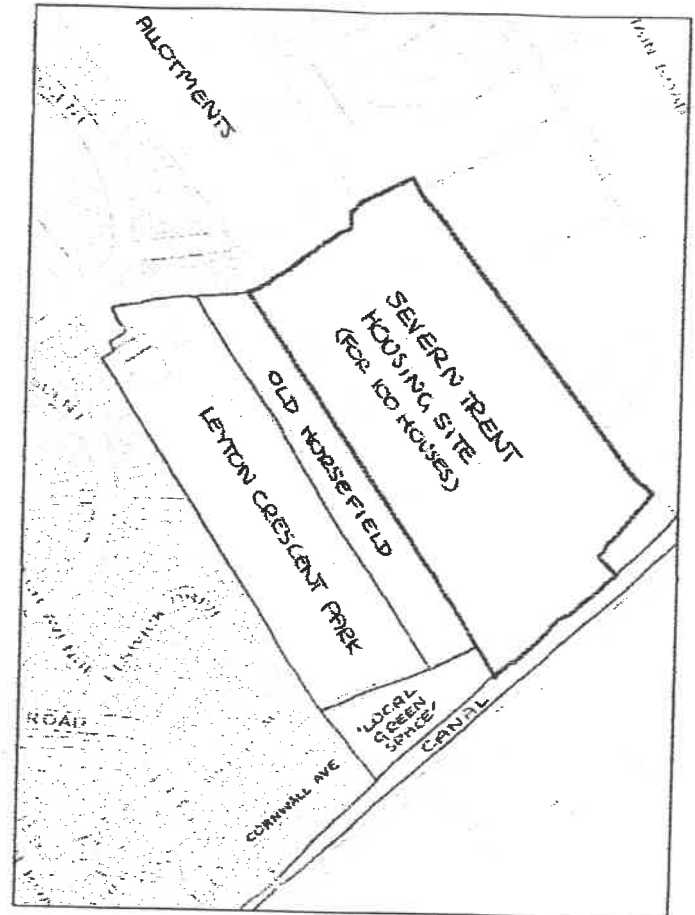
we object to the local plan modification as they don't go far enough, as the old horsefield beside heyton Crescent should be designated as Local Green Space

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

## REASONS WHY WE THINK THE HORSEFIELD SHOULD BE PROTECTED AS A LOCAL GREEN SPACE :

1. It is a historic local feature – a 2 ½ acre field over 200 years old, grazed for much of this time and still locally known as the 'horsefield'. Historic fields like this and the Cornwall Ave field are rare within Beeston's urban area. They deserve protection and need maintaining.
2. It is important for wildlife – almost ½ mile of natural grassland with scrub, trees and hedgerows, stretching from the canalside field up to Leyton Crescent. A valuable route for wildlife, also leading to other habitats such as the allotments, gardens and park.
3. It is well-used for recreation – The horsefield, together with the Cornwall Ave field, provides a 1/2 mile 'rural' walk from Cornwall Ave and the canal up to Leyton Crescent and through to the park. It is a daily route for locals, especially with dogs. Birds, butterflies, wild flowers, blackberries, sloes, and country views are all enjoyed here.
4. It is an accessible strip of countryside between the Rylands and the proposed Severn Trent housing site, benefiting both.
5. It has educational value where children can experience and learn about nature in a confined and accessible place.
6. It will be a natural green 'buffer' zone between the Rylands and the proposed Severn Trent housing site.
7. It provides a rural backdrop to Leyton Crescent park, as the horsefield borders the entire eastern side of the park.
8. It acts as an extension to the park – being a natural green space linked to the formal playing fields.
- 9) It will be vulnerable to future development if it is not protected – Being sandwiched between the park and the Severn Trent housing area it could easily become an infill site for more houses.
- 10) Its value to the local community has been repeatedly expressed -
  - a) At Broxtowe Council's Community Action Team (CAT) meetings locals have repeatedly said they want this field to be protected.
  - b) During the previous Local Plan public consultation a large number of local people, plus Beeston Wildlife Group and the Civic Society, all asked for this field to be protected as a natural green space.







# Part 2 Local Plan Main Modifications Consultation Response Form

BROXTOWE BOROUGH COUNCIL

08 JUL 2019

PLANNING



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr	Mrs	<input checked="" type="radio"/> Miss	Ms	Other:
Name	Brenda McCourtney				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

We object to the Local Plan modifications as they don't go far enough, as the old horsefield should be designated as Local Green Space.

Reasons why many of us think the horsefield should be protected as a Local Green Space:-

It is a historic local feature. It's important for wildlife.

It is well used for recreation. It is an accessible strip of country side between the Rylands + the proposed Severn Trent housing site, benefiting both. It has educational value where local children can experience + learn about nature in a confined + accessible place. It will be a natural green 'buffer' zone between Rylands + the S.T. housing site. It provides a rural backdrop to Lynton Crescent park. It acts as an extension + The port. It will be very vulnerable to future development if it is not protected.

It would form a natural extension + Cornhill Avenue Local Green Space - to create a 4 acre L-shaped Local Green Space. Its value to the local community has been repeatedly expressed at C.A.T. meetings also by a large number of local residents, plus Beeston Wildlife Group and the Grit Society. PLEASE PROTECT THE OLD HORSEFIELD AS A NATURAL GREEN SPACE. (please refer to map included)

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.





# Part 2 Local Plan Main Modifications Consultation Response Form



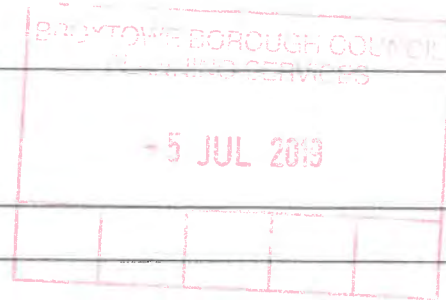
**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	SEAN MORLEY
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]



**All comments must be received by 5pm Tuesday 9 July 2019**

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

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(Please see consultation document)

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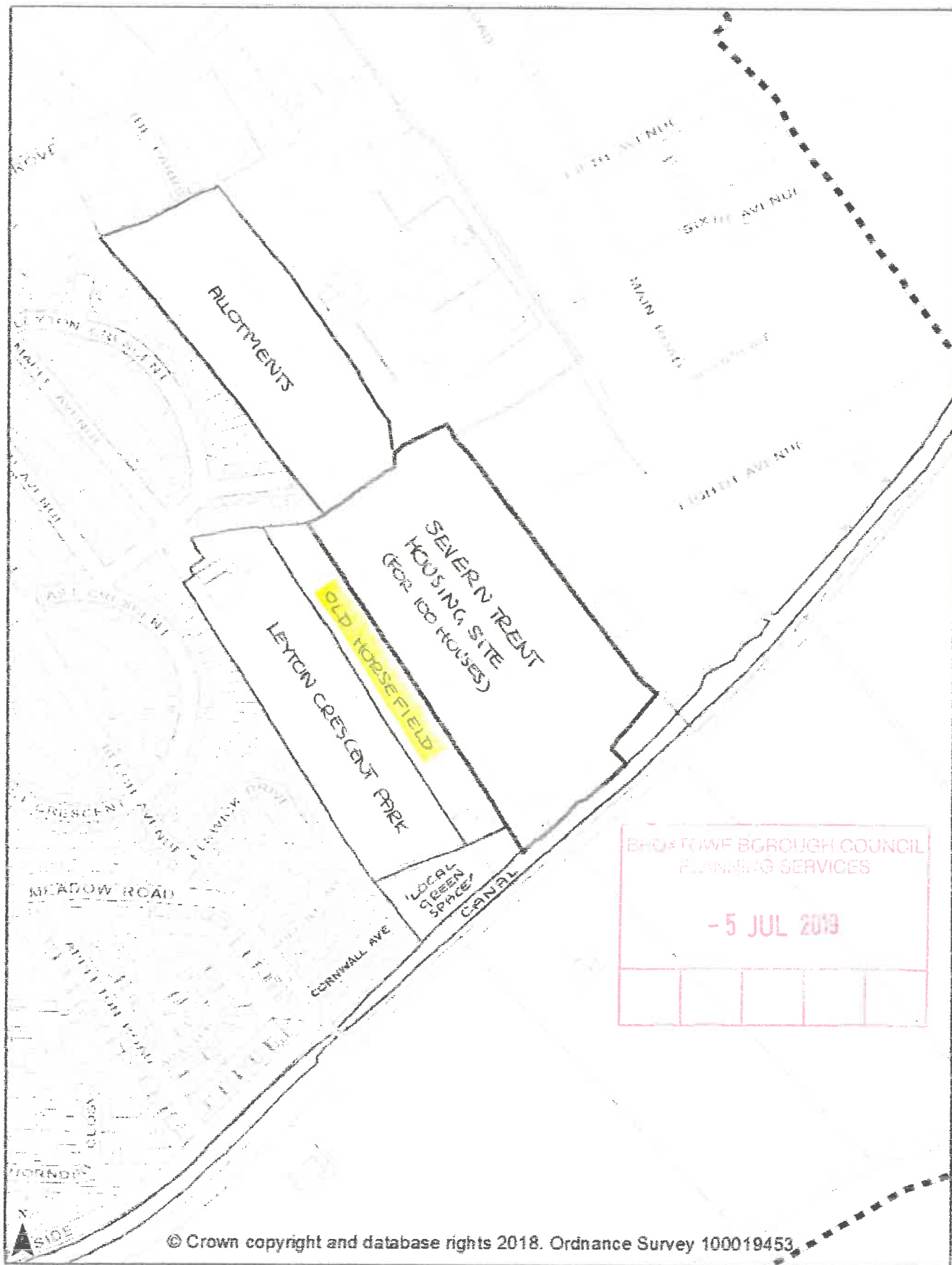
IT IS AN IMPORTANT AREA FOR WILD LIFE  
& HAS BEEN FOR MANY YEARS. IS  
EDUCATIONAL FOR CHILDREN & PROVIDES  
A PROXIMATE COUNTRY WALK.

IT SHOULD REMAIN AS AN OPEN GREEN  
SPACE FOR FUTURE GENERATIONS TO  
ENJOY.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.









# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

Agent (if applicable)

Please provide your client's name

- 9 JUL 2019

## Your Details

Title	Mr <del>Ms</del> <del>Miss</del> <del>Ms</del> Other:
Name	JEFFREY MORTON
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

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(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

WE OBJECT TO THE LOCAL PLAN MODIFICATIONS AS THEY DON'T GO FAR ENOUGH, AS THE OLD HORSEFIELD SHOULD BE DESIGNATED AS LOCAL GREEN SPACE.

THE HORSEFIELD IS AN HISTORICAL FEATURE WELL USED BY THE LOCAL COMMUNITY THROUGHOUT THE YEAR. IT PROVIDES A HALF-MILE RURAL WALK FROM CORNWALL AVE AND THE CANAL UP TO LEYTON CRESCENT AND THE PARK. IT IS A REGULAR ROUTE FOR DOG WALKERS.

IT IS IMPORTANT FOR WILDLIFE, PROVIDING 2 1/2 ACRES OF SCRUB TREES, HEDGEROWS AND NATURAL GRASSLAND, A RARE FEATURE IN BEGSTON'S URBAN AREA AND DESERVING OF PROTECTION.

IT IS AN ACCESSIBLE STRIP OF COUNTRYSIDE WHICH WILL BE A NATURAL GREEN BUFFER ZONE BETWEEN THE RYLANDS AND THE PROPOSED SEVEN TRENT HOUSING SITE, BENEFITTING BOTH COMMUNITIES.

SANDWICHED BETWEEN THE PARK AND THE SEVERN TRENT HOUSING IT WOULD BE VERY VULNERABLE TO FUTURE DEVELOPMENT IF NOT PROTECTED AND COULD BE USED FOR BUILDING MORE HOUSES.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.





# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Matthew Nilan
Organisation	n/a
Address	
Tel. Number	
E-mail address	

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	No
---	----

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## Questions

Which Main Modification does this response relate to?	MM35
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	The local plan modifications do not designate the old horsefield beside Leyton Crescent park as a Local Green Space. It's important to all local residents that this space should be protected as it is.

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Emma Brook
Organisation	Nottinghamshire County Council
Address	
Tel. Number	
E-mail address	

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

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Do you support or object to the Main Modification?	Support

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It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	Public Health welcome the inclusion and promotion of the Healthier Options Takeaway (HOT) merit scheme however a clearer introductory statement and reference to the publication of Nottinghamshire Spatial Planning and Health Framework 2019-2022. <a href="https://www.nottinghamshire.gov.uk/planning-and-environment/planning-and-health-framework/planning-and-health-framework-2019-2022">https://www.nottinghamshire.gov.uk/planning-and-environment/planning-and-health-framework/planning-and-health-framework-2019-2022</a> should be included. The Spatial Planning and Health Framework has involved consultation with partner authorities and organisations, addresses the impact of developments on the health and wellbeing of Nottinghamshire to ensure that health requirements are met. The Framework outlines the use of the Checklist for Planning which includes criteria amongst others that reflect and support Policy 24. In addition the justification for Policy 24 (MM33) should be clearly reference in Policy 26 (MM34) and 27 (MM35).

**Genway, Tom**

---

**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awsworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new



builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



Nottinghamshire Wildlife Trust is the county's largest environmental charity - run by local people for the benefit of local wildlife. We manage nature reserves across the county, champion nature and inspire adults and children about the natural world. Together we are working to create a Living Landscape for Nottinghamshire.

**Are you a member of Nottinghamshire Wildlife Trust?**

**Join us now online** [REDACTED]

To find out how we use and protect your personal data, please see our Privacy Policy on our website at [www.nottinghamshirewildlife.org](http://www.nottinghamshirewildlife.org)

Registered office: The Old Ragged School, Brook St, Nottingham NG1 1EA  
Registered in England & Wales: no. 748865. Charity no.224168R

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr	Mrs	Miss	Ms	Other
Name	SALVESTON OSEI				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]	

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**By submitting this response form you are agreeing to these conditions.**

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**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

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It isn't consistent with national policy

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4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

We object to the Local Plan of Modification. The horsefield should be designated as a Local Green Space. It is a local access to nature. I love taking the dogs for a walk and notice all the wild life that has engulfed the horsefield. This should be treasured and appreciated. It would be a travesty to lose this amazing area of beautiful nature filled space.

Please consider this area to be a local nature treasure that should not be lost.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.







# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<del>Mr</del> Mrs Miss Ms Other:-
Name	NAOMI OSEI
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to	[REDACTED]

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an online response form please visit:

[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)

**Data Protection** - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.  
**By submitting this response form you are agreeing to these conditions.**

**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

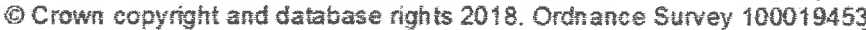
We object to the Local Plan modifications as they don't go far enough, as the old horsefield should be designated as Local Green Space.

The horsefield has been in situ for hundreds of years and is an important wildlife area. It is an extension of the re-created area a loss of which is a loss of a natural re-created area which could never be replaced.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.







# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Ms
Name	Sarah Parker
Organisation	none
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	No
---	----

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## Questions

Which Main Modification does this response relate to?	MM35
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	Yes
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	The field is very old and has lots of wildlife. It is used by locals and for walks, its not really accessible for anything else and would be nice to keep this little green space. It'll be nice to have this gap between the new housing estate. It should be designated as a green space

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

## Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	BRIAN RORISON
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	
Tel. Number	[REDACTED]
E-mail address	

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:	[REDACTED]

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response form** please visit:

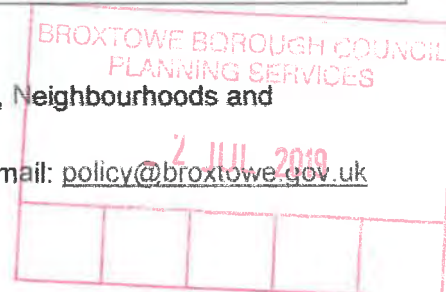
**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

ITS AN IMPORTANT GREEN SPACE, ITS  
UNTIDY AND OVERGROWN, ALLOWS ROOM  
FOR HEDGEHOGS AND OTHER MAMMALS,  
ALSO SPACE FOR BIRDS TO  
NEST AND FEED.

GREEN SPACES LIKE THIS ARE  
IMPORTANT FOR PEOPLES MENTAL  
WELL BEING.

SO PLEASE LEAVE THE OLD  
HORSEFIELD ALONE AND DON'T  
TIDY IT UP

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.







## **URGENT UPDATE ABOUT THE OLD HORSEFIELD BESIDE LEYTON CRESCENT PARK**

About 18 months ago Broxtowe Borough Council completed the Local Plan which shows how Broxtowe will be developed. At that time, many of us asked for 2 of our local fields to be protected by designating them as 'Local Green Space' (LGS) –

1) The Cornwall Avenue field, and 2) the old horsefield at the east side of Leyton Crescent park. (see attached map)  
As a result, Cornwall Avenue field was designated as LGS, which was really great news, but the old horsefield was not.

The Local Plan is now being assessed by an independent Inspector, and there is a further public consultation. This gives us another chance to ask for the horsefield to be designated as LGS. If it is not protected it will be very vulnerable to future development, as it will be sandwiched between the park and the proposed Severn-Trent housing site.

If you would like this field to be protected from future development, do please fill in the attached form, as below, and send it to Broxtowe Council by **JULY 9<sup>th</sup>**. We were successful getting the Cornwall Avenue field protected when enough of us pushed for it, and we may be successful with the horsefield too if we push a bit more.

---

### **HOW TO FILL IN THE ATTACHED FORM IF YOU WANT THIS FIELD PROTECTED:** (as advised by Broxtowe Planning Dept)

Our comments must relate to the modifications made to the Local Plan, so we need to fill in the form as follows:

Q 1. Our response relates to MM35 (Main Modifications to the Local Green Space).

Q 2. Tick the 'Object' box.

Q 3. It's not necessary to tick these boxes.

Q 4. Reason for objection - Say "I object because the modifications did not go far enough ie the Cornwall Ave Local Green Space should have been extended to include the old horsefield". Attach map to show which field this is. Then say why the horsefield is special & needs protecting.

---

### **THIS IS WHY MANY OF US THINK THE HORSEFIELD SHOULD BE PROTECTED AS LOCAL GREEN SPACE :**

1. It is a historic local feature – a small field over 200 years old, grazed for much of this time and still widely known as the 'horsefield'. Historic fields like this and the Cornwall Ave field are rare in Beeston's urban area and deserve protection.
2. It is important for wildlife – 2½ acres of natural grassland with scrub, trees and hedgerows. It also adjoins the Cornwall Ave field and together they provide a ½ mile strip of countryside stretching from the canal up to Leyton Crescent. This is a valuable route for wildlife and it leads to other habitats including the allotments, gardens and park.
3. It is well-used for recreation – the horsefield and Cornwall Ave field together provide a half mile 'rural' walk from Cornwall Ave and the canal up to Leyton Crescent and through to the park. It is a well-trodden route for locals, especially with dogs, used daily throughout the year. A popular circular walk combines the horsefield, the Cornwall Ave field and the park.
4. It is an accessible strip of countryside between the Rylands and the proposed Severn Trent housing site, benefitting both.
5. It has educational value where local children can experience and learn about nature in a confined and accessible place.
6. It will be a natural green 'buffer' zone between the Rylands and the Severn Trent housing site.
7. It provides a rural backdrop to Leyton Crescent park as the horsefield borders the entire eastern side of the park.
8. It acts as an extension to the park – being a natural green space for informal recreation linked to the formal playing fields.
- 9) It will be vulnerable to future development if it is not protected - sandwiched between the Park and the Severn Trent housing area it could become an infill site for building more houses.
- 10) It would form a natural extension to Cornwall Ave Local Green Space – to create a 4 acre L-shaped Local Green Space.
- 11) Its value to the local community has been repeatedly expressed
  - a) At Broxtowe Council's C.A.T meetings locals have repeatedly said they want this field to be protected.
  - b) During the previous Local Plan public consultation a large number of local residents, plus Beeston Wildlife Group and the Civic Society, all asked for this field to be protected as a natural green space.

**Hoping for your support - Best regards,** [REDACTED]



# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Miss
Name	Clare Salmond
Organisation	None
Address	
Tel. Number	
E-mail address	

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
---	-----

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By submitting this response form you are agreeing to these conditions.

## Questions

Which Main Modification does this response relate to?	MM35 (Main modifications to Local Green Space)
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	<p>I object because the modification did not go far enough ie Cornwall Avenue Local Green Space should have been extended to include the over 200 year old horse field grazed for much of that time and still widely known as the horse field and are rare in Beeston urban and deserves protection, it is well used for recreation for locals, dog walker, an educational place for people for natural wildlife in a confined and accessible place. It will be vulnerable to future development if it is not protected, we need a natural green buffer zone between the Severn Trent housing site and Boots housing site too. It's value to the local community has been repeatedly expressed at Broxtowe's Council C.A.T meeting want the field to be protected, during the previous Local Plan public consultation a large number of local residents plus Beeston Wildlife Group and Civic Society all asked for this field to be protected as a natural green space with Cornwall Ave Local Green Space it would form a natural extension and not become an infill site for building more houses with prospect of approx 900 homes being build within 1/2 mile radius from the horsefield in next few years, we need to protect this land for nature.</p> <p>Kind regards Clare Salmond</p>

# Part 2 Local Plan Main Modifications Consultation Response Form

BROXTOWE BOROUGH COUNCIL  
RECEPTION

24 JUN 2019

ORIGINAL DOCUMENTS SEEN  
SIGNED .....



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name

Your Details

Title	Mr Mrs Miss Ms Other
Name	DAVE SHORTLAND
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

25 JUN 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

WE OBJECT TO THE LOCAL PLAN MODIFICATIONS AS  
THEY DON'T GO FAR ENOUGH AS THE OLD HORSEFIELD  
SHOULD BE DESIGNATED AS LOCAL GREEN SPACE

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.









# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mrs
Name	Rebecca Taylor
Organisation	Resident
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

Responses should be limited to the Main Modifications. Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	No
---	----

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## Questions

Which Main Modification does this response relate to?	Our response relates to MM35
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).

It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	We object to the local plan modifications as they don't go far enough, as the old horsefield beside Leyton Crescent Park should be designated as local green space. It is important to protect our green spaces for us and future generations. There is enough development in the area and we are already at risk of overcrowding, we need somewhere that we know is safe from more development. The 'feel' in the Rylands is more like a village than a suburb in a large city, we want to keep that.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

- 9 JUL 2019

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input checked="" type="checkbox"/> Mr	<input type="checkbox"/> Mrs	<input type="checkbox"/> Miss	<input type="checkbox"/> Ms	Other:
Name	GAYLE TEBBUTT				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

**All comments must be received by 5pm Tuesday 9 July 2019**

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*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

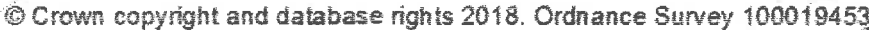
Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I object because the modifications did not go far enough to include horsefield. It is an important area for wildlife consisting of 2½ acres of natural grassland with trees, hedgerows and scrub. This is a route for wildlife from the field off Cornwall Avenue to Heyton Crescent and allotments, gardens and park. This field has been used for grazing for most of the last 200 years and historic fields are rare in Beeston's urban area. The field is used daily by local people with dogs. A popular circular walk combining the horsefield, the Cornwall Avenue field and the park. It is an accessible strip of countryside between the Rylands and the proposed Severn Trent housing site. More houses will require more green space not less. It has educational value for children to experience and learn about nature within an accessible space. Its value to the local community has been repeatedly expressed at Braxtowe Council's CAT meetings where local people have asked for this field to be protected along with Beeston Wildlife Group and the Civic Society. All asked for this field's protection as a natural green space.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.





# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Paul Tideswell
Organisation	None
Address	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes
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## Questions

Which Main Modification does this response relate to?	MM35 (Main Modification to the Local Green Space)
Do you support or object to the Main Modification?	Object

If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182).	
It isn't justified e.g. there is no evidence to justify the modification	No
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	It is a historic local feature, over 200 years old of grazing area hence the name 'horse field' It is important for wildlife e.g. Nesting pair of buzzards It is well used for recreation, including the walking of my dog(s) It is an accessible strip of countryside, e.g. dog walking, natural growth to educate children, including my granddaughter It is a natural green buffer zone between the Rylands & proposed development It is a natural noise barrier between the Rylands & the industrial estate/Boots It is an extension to the recreation ground & Cornwall Avenue field It will be vulnerable to future development if not protected

# Details

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your details

Title	Mr
Name	Tim
Organisation	N/A
Address	[REDACTED]
Tel. Number	
E-mail address	[REDACTED]

All comments must be received by 5pm Tuesday 9 July 2019

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	No
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It isn't justified e.g. there is no evidence to justify the modification	Yes
It is not positively prepared e.g. strategy will not meet development needs	No
It is not effective i.e. it won't work	No
It isn't consistent with national policy	No
It doesn't comply with the law	No
Reasons for Support or Objection	I would like to see the 'old horsefield' land designated as local green space. I regularly walk my dog around this area and believe it provides an important area for habitats, vegetation and wildlife.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES

Agent (if applicable)

Please provide your client's name

- 5 JUL 2019

## Your Details

Title	Mr	Mrs	Miss	Ms	Other:	MISS
Name	KAREN WALKER					
Organisation (if responding on behalf of an organisation)						
Address						
Postcode						
Tel. Number						
E-mail address						

**All comments must be received by 5pm Tuesday 9 July 2019**

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

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**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I object to the Local Plan modifications because they do not go far enough. The old horsefield beside Leyton Crescent park should be designated as Local Green Space.

I frequently use this area of land as part of a short walk. It provides an attractive buffer zone between the well-maintained playing fields and the area currently designated for housing and as such will be of benefit to both the Rylands and the proposed Severn Trent housing site. It will be vulnerable to future development if not protected.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

## URGENT UPDATE ABOUT THE OLD HORSEFIELD BESIDE LEYTON CRESCENT PARK, BEESTON

In 2017 Broxtowe Council completed a Local Plan to show how Broxtowe will be developed. At that time, many of us asked that 2 local fields be protected from development by designating them as 'Local Green Space' (LGS) – 1) The Cornwall Ave field, and 2) the old horsefield at the east side of Leyton Crescent park. As a result, Cornwall Ave field was designated as LGS but the horsefield was not.

There have now been some modifications to the Local Plan, but they have not gone far enough as the horsefield is STILL not designated as LGS. There is another public consultation now though, so we have an opportunity to object and ask AGAIN for the horsefield to be designated. We were successful getting the Cornwall Avenue field protected, so it really is worth trying again for the horsefield.

### IF YOU WANT TO GET THE HORSEFIELD PROTECTED FROM FUTURE DEVELOPMENT, DO PLEASE FILL IN THE ATTACHED FORM, AND GET IT TO BROXTOWE COUNCIL BY 9<sup>TH</sup> JULY.

If you want to fill in the form online go to [www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan) - select 'online response form' (4<sup>th</sup> bullet point down)

Broxtowe planning officer said that, on the form, it is important to express our objection as follows:

Q 1. Our response relates to MM35 (Main Modification to the Local Green Space).

Q 2. Select 'Object' to the main modification.

Q 3. No need to tick any of the next 5 boxes.

Q 4. Reasons for objection - say ***"We object to the Local Plan modifications as they don't go far enough, as the old horsefield beside Leyton Crescent park should be designated as Local Green Space"***. Then explain why the horsefield is special to us and needs protecting. (You could cut out the map below and attach it to your form)

### REASONS WHY WE THINK THE HORSEFIELD SHOULD BE PROTECTED AS A LOCAL GREEN SPACE :

1. It is a historic local feature – a 2 ½ acre field over 200 years old, grazed for much of this time and still locally known as the 'horsefield'. Historic fields like this and the Cornwall Ave field are rare within Beeston's urban area. They deserve protection and need maintaining.
2. It is important for wildlife – almost ½ mile of natural grassland with scrub, trees and hedgerows, stretching from the canalside field up to Leyton Crescent. A valuable route for wildlife, also leading to other habitats such as the allotments, gardens and park.
3. It is well-used for recreation – The horsefield, together with the Cornwall Ave field, provides a 1/2 mile 'rural' walk from Cornwall Ave and the canal up to Leyton Crescent and through to the park. It is a daily route for locals, especially with dogs. Birds, butterflies, wild flowers, blackberries, sloes, and country views are all enjoyed here.
4. It is an accessible strip of countryside between the Rylands and the proposed Severn Trent housing site, benefitting both.
5. It has educational value where children can experience and learn about nature in a confined and accessible place.
6. It will be a natural green 'buffer' zone between the Rylands and the proposed Severn Trent housing site.
7. It provides a rural backdrop to Leyton Crescent park, as the horsefield borders the entire eastern side of the park.
8. It acts as an extension to the park – being a natural green space linked to the formal playing fields.
- 9) It will be vulnerable to future development if it is not protected – Being sandwiched between the park and the Severn Trent housing area it could easily become an infill site for more houses.
- 10) Its value to the local community has been repeatedly expressed -
  - a) At Broxtowe Council's Community Action Team (CAT) meetings locals have repeatedly said they want this field to be protected.
  - b) During the previous Local Plan public consultation a large number of local people, plus Beeston Wildlife Group and the Civic Society, all asked for this field to be protected as a natural green space.

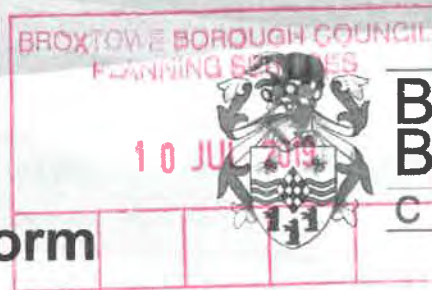
Hoping for your support - Best regards, Glynis ( [REDACTED] )







# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr	Mrs	<input checked="" type="radio"/> Miss	Ms	Other:
Name	TRACY WEALTHALL				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

**Yes** ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support ☐

Object ☒

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the Government's National Planning Policy Framework (2012 version) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☒

It isn't consistent with national policy ☐

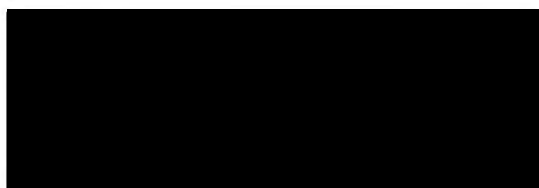
It doesn't comply with the law ☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

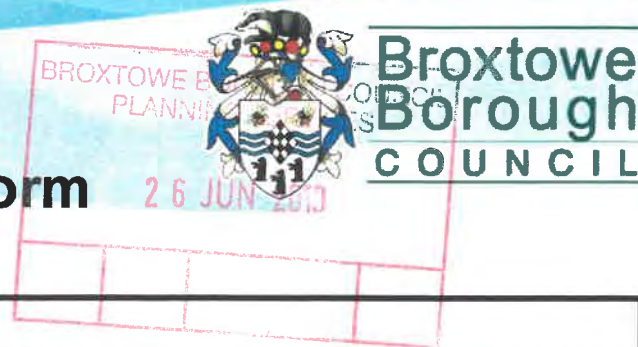
All the reasons  
on the front of  
this letter



This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form

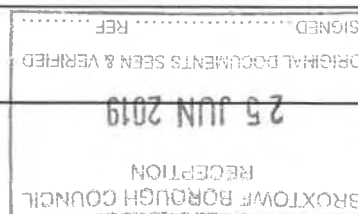


Agent (if applicable)

Please provide your client's name

## Your Details

Title	Mr	Mrs	<u>Miss</u>	Ms	Other:
Name	MARYSIA ZIPSER				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					



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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

35

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☐

Object

☒

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It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for **SUPPORT** or **OBJECTION**:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I object because the modifications did not go far enough i.e. the Cornwall Ave Local Green Space should have been extended to include the ~~be~~ old horsefield. This horsefield is special and needs protecting because:-

- 1) I use this field regularly in addition to the Leyton Crescent park for my daily walking and with my dog for my health & well being and exercise.
- 2) This field is so important for wildlife as a valuable route for them & leads to other habitats including allotments, gardens & park.
- 3) It's also a popular circular walk combining all.
- 4) It has educational value, where local children can experience & learn about nature in a confined & accessible place.
- 5) It is an historic local feature, over 200 years old, and rare in Beeston's urban area & deserves protection.
- 6) It is well used for recreation.
- 7) It will be vulnerable to future development if it is not included, sandwiched between the park and the Severn Trent housing area it could become an infill site for building more houses. →

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

/Continued.

8) Its value to the local community has been repeatedly expressed.

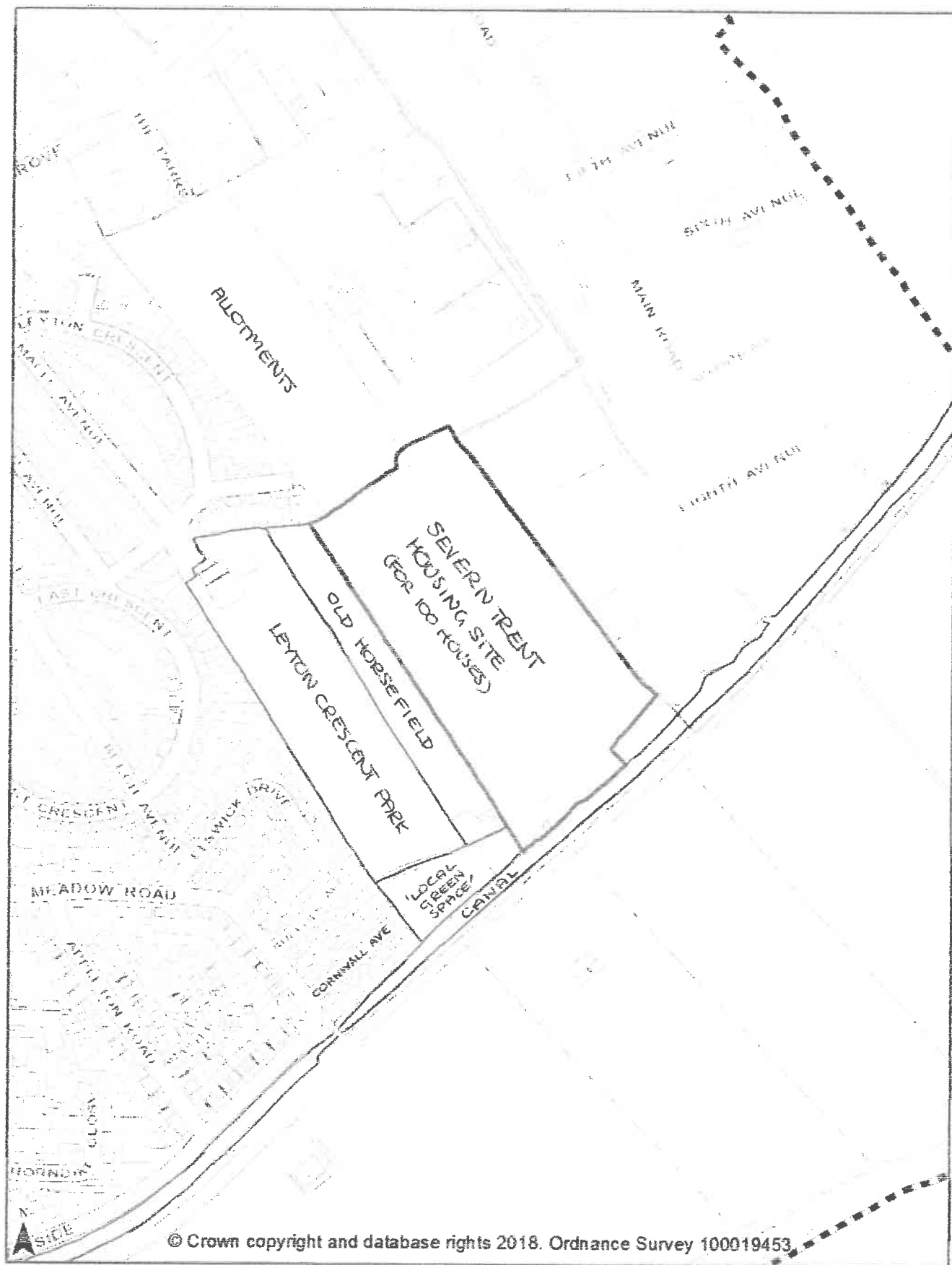
a) at Breatower Council CAT local meetings have repeatedly said they want this field to be protected.

b) Also myself and a larger number of local residents, plus Beeston Wildlife Group & the Civic Society, all asked for this field to be protected as a natural green space.

Many thanks in advance of your serious consideration about the Old Horsefield.

 25/6/19.







# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input checked="" type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	Sheldon ZLOTOWITZ
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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MM

MM 35

(Please see consultation document)

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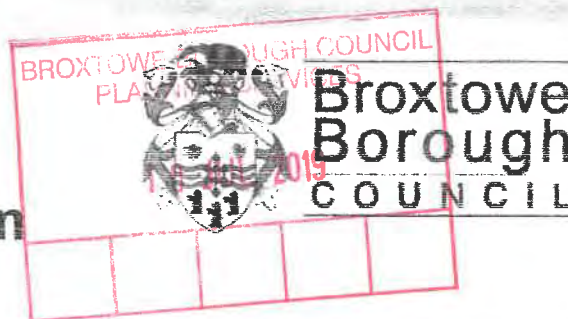
I object to the local plan modifications as they don't go far enough, as the old horsefield beside Layton Crescent park should be designated as Local Green space. It has been a public access field for a very long time. It is well used by children and adults throughout the year, summer + winter. It is an important area for wildlife including nesting birds. It's important for children to have access to wild areas as it is swings + slides. It should be a green buffer zone between the new proposed housing. Local people have repeatedly urged Braxton to protect this valuable green space forever.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

## Your Details

Title	Mr Mrs Miss <b>Ms</b> Other:
Name	CAROL ZLOTOWITZ
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:	[REDACTED]

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(Please see consultation document)

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It isn't consistent with national policy

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It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I object to the Local Plan modifications as the Old Horsefield beside Leyton Crescent Park was supposed to be designated as a Local Green Space. Why is this being overturned? In this time of Environmental catastrophe we need all our wild areas and trees to be conserved. Wild places for children to play, to walk dogs & enjoy a small slice of nature in the city. There is so much housebuilding going on in the Rylands area already. It is getting so built up, so bleak and so ugly already.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Main Modifications 36

**Genway, Tom**

---

**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awsworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new

builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



Nottinghamshire Wildlife Trust is the county's largest environmental charity - run by local people for the benefit of local wildlife. We manage nature reserves across the county, champion nature and inspire adults and children about the natural world. Together we are working to create a Living Landscape for Nottinghamshire.

**Are you a member of Nottinghamshire Wildlife Trust?**

**Join us now online** [REDACTED]

To find out how we use and protect your personal data, please see our Privacy Policy on our website at [www.nottinghamshirewildlife.org](http://www.nottinghamshirewildlife.org)

Registered office: The Old Ragged School, Brook St, Nottingham NG1 1EA  
Registered in England & Wales: no. 748865. Charity no.224168R

# Main Modifications 37



# Part 2 Local Plan Main Modifications Consultation Response Form



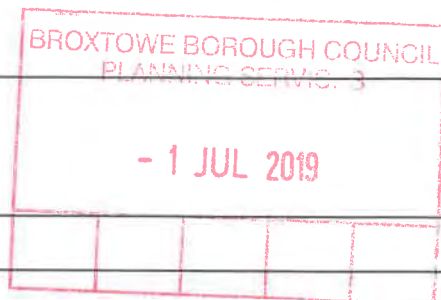
**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	
-----------------------------------	--

Your Details

Title	Mr	Mrs	<u>Mies</u>	Ms	Other:
Name	MEYEL TOPLISS				
Organisation (if responding on behalf of an organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					



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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

37

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

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4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

While I support the modification of Policy 31 as requested by Natural England, I believe this should preclude the inclusion of the Church Lane site for housing development in the Local Plan.

The site is of high ecological value, contains the habitats of protected wildlife, borders a SINC site and nature reserve and is in close proximity to ancient woodland.

The severe damage to the biodiversity of the location which would result from the proposed development is contrary to both this policy and several of the NPPF.

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Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input checked="" type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	MERYL TOPLUSS
Organisation (if responding on behalf of an organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

BROXTOWE BOROUGH COUNCIL  
PLANNING SERVICES  
- 1 JUL 2019

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes



Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: \_\_\_\_\_

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**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM 32  
(Please see consultation document)

2. Do you support or object to the Main Modification?

Support ☒

Object ☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☒

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

I agree with the modification which states the need to identify substantial harm to heritage assets and weigh them against any public benefits. I believe that substantial harm would result from development on the Church Lane site to the setting of the Headstocks Heritage site and that this harm has not been identified. A large housing development adjacent to the heritage area would destroy the peace and tranquillity essential to the character and appearance of the asset. As an important element of the D.H. Lawrence Heritage, the Headstocks and nature reserve are visited by a growing number of visitors from as far afield as the U.S.A. The proposed development would inevitably have a very adverse effect on what is one of the Country's most important assets.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

## Genway, Tom

---

**From:** Bingham, Felicity [REDACTED]  
**Sent:** 10 July 2019 16:56  
**To:** Genway, Tom  
**Subject:** RE: 2019-07-09 283940 Broxtowe Local Plan Part 2 Main Modifications

Dear Sir/Madam,

Thank you for the below consultation. Regarding the modifications made to policy 31: Biodiversity Assets, we support the additional paragraph which will help to support and enhance Broxtowe's biodiversity and geodiversity. However we reiterate our previous comments that paragraph 2 only references "increased use" which would seem to imply the increase in recreational use resulting from development, while this is only one source of harm that could occur. We also advise that this policy should make reference to the mitigation hierarchy as set out at 118 of the NPPF.

Do let me know if you have any further questions.

Kind regards,

**Felicity Bingham**  
Area Delivery  
East Midlands Area Team  
[REDACTED]

<http://www.gov.uk/natural-england>

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

---

**From:** Genway, Tom [REDACTED] **Behalf Of** Policy  
**Sent:** 24 May 2019 10:01  
**To:** SM-NE-Consultations (NE) [REDACTED]  
**Subject:** Broxtowe Local Plan Part 2 Main Modifications

Dear Sir/Madam

### **PART 2 LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION**

Broxtowe's Part 2 Local Plan was submitted for examination in August 2018. The examination process is being carried out by Helen Hockenhull who is an independent

Planning Inspector. The Inspector will determine whether the Plan is 'sound' and complies with legal requirements.

You have received this letter because you have made comments on the Part 2 Local Plan at an earlier stage during its preparation, you are a consultee, or have requested to be notified. Please let us know if you no longer wish to be kept informed.

Following the completion of the public hearings, the Plan has reached the next key stage in the process. The Inspector has now asked that consultation be carried out on the Main Modifications which may be necessary to make the Plan 'sound' and / or legally compliant.

Broxtowe Borough Council is inviting your comments on the Main Modifications to the Part 2 Local Plan and these can be made between **Friday 24<sup>th</sup> May 2019** and **5pm on Tuesday 9<sup>th</sup> July 2019. Responses should be limited to the Main Modifications documents.** Details of the consultation documents and how to respond can be found overleaf, comments relating to other issues will not be considered by the Inspector.

There are also some Additional Modifications, which are minor changes to update the Local Plan and are included for information only. After the Consultation, the Inspector will consider all comments on the Main Modifications before issuing her Report on whether she considers the Local Plan sound and / or legally compliant.

If you have any queries, please do not hesitate to contact the Planning Policy team.

Yours faithfully



Steffan Saunders  
Head of Neighbourhoods & Prosperity



**Broxtowe Borough Council Part 2 Local Plan  
Notice of public consultation on Main Modifications  
Town and Country Planning (Local Planning) (England) Regulations 2012**

The Council is seeking comments on the Main Modifications to the Broxtowe Borough Part 2 Local Plan. The Main Modifications are those that the Inspector has identified as possibly being necessary in order for the Plan to be found 'sound'. The Inspector's final conclusions will be given in her Report in due course.

Consultation on the Main Modifications and the associated Sustainability Appraisal of the Main Modifications will run from **Friday 24<sup>th</sup> May 2019 until 5pm on Tuesday 9<sup>th</sup> July 2019**. Comments must be received within this time, representations received after this date and time will not be accepted.

**At this stage representations are only being sought on whether the Main Modifications to the Plan are sound and/or legally compliant.**

**If a response was made to the previous Part 2 Local Plan consultations, there is no need to resubmit them during this representation period as the Inspector has already considered these representations during the course of the Examination.**

Representations are invited on the following documents:

- Schedule of Main Modifications;
- Main Modifications Sustainability Appraisal and Habitats Regulation Assessment update; and
- Schedule of Changes to the Policies Map.

Representations can be made:

- online via [www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)
- by email to [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)
- by post to Planning Policy, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham NG9 1AB

Documents are available for inspection on our website: [www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan) and at the following locations:

- The Council's Main Offices at: Foster Avenue, Beeston, NG9 1AB (Mon-Thursday 08:30-17:00 & Friday 8.30 – 16.30);
- Beeston Library, Foster Avenue, Beeston, Nottingham NG9 1AE (0115 925 5168);
- Chilwell (Inham Nook) Library, Barn Croft, Chilwell, Nottingham NG9 4HU (0115 804 4363);
- Eastwood Library, Wellington Place, Eastwood, Nottingham NG16 3GB (01773 712209);
- Kimberley Library, Main Street, Kimberley, Nottingham NG16 2LY (0115 804 4363);
- Stapleford Library, Church Street, Stapleford, Nottingham NG9 8GA (0115 939 9178);
- Toton Library, Stapleford Lane, Toton, Nottingham NG9 6GA (0115 804 4363).

Opening times for the libraries can be found online at: [www.inspireculture.org.uk/reading-information/](http://www.inspireculture.org.uk/reading-information/)

Should you have any queries relating to this consultation, you can contact the Planning Policy team on 0115 917 3452 or email [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

Large print copies of this notice are available on request.

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**Genway, Tom**

---

**From:** Ben Driver [REDACTED]  
**Sent:** 09 July 2019 14:26  
**To:** Policy  
**Subject:** Main Modifications to the Part 2 Local Plan, NWT comments

Dear Sir/ Madam

Please find our comments below. We apologise that, due to limited resources/ time to review the plan we have been unable to use your standard response templates.

Whilst we don't support all of the allocations themselves, we do support the following amendments:

**MM3 Policy 3.1 Chetwynd Barracks**

Reference to retention of mature trees and securing future management of Hogoblin Wood in the policy wording

**MM5 Policy 3.3: Bramcote (east of Coventry Lane)**

Clarification of positioning of Green Infrastructure and significance of Local Wildlife Site

**MM7 Policy: 3.5: Severn Trent, Beeston**

Securing long-term management of green space and retention of hedgerows in policy wording

**MM8 Policy 3.6: Beeston Maltings**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM9 Policy 3.7: Cement Depot Beeston**

Provision of wildlife corridor along railway mentioned in the policy wording

**MM11 Policy 4.1 Land west of Awworth (inside the bypass)**

Retention of hedges and protection of common toads mentioned in policy wording

**MM12 Policy: 5.1: East of Church Lane Brinsley**

Reference to planting and incorporation of suds in policy wording and identification of green space identified on a map, in order to buffer Brinsley Headstocks LNR

**MM14 Policy: 6.1: Walker Street, Eastwood**

Reference to wildlife corridor in policy wording

**MM16 Policy: 7.1: Land south of Kimberley including Kimberley Depot**

Reference in policy wording to mitigating any impacts on, and securing future management of, Local Wildlife Site

**MM17 Policy: 7.2: Land south of Eastwood Road Kimberley**

Inclusion of field in the Green Infrastructure and reference to this in the policy wording

Our comments on other policies are as follows:

**MM30 Policy 17: Place-making, Design and Amenity**

We welcome policy 17 (o). The amended supporting text provides examples such as gaps under fences for hedgehog and insect houses. **Proposed amendment:** We would like to see bat and bird (e.g. swift and house sparrow) bricks added to the text. Such features can be incorporated easily into the external walls of new

builds for relatively low cost. This has been done elsewhere and one example is in the former Cotgrave Colliery development (Rushcliffe).

#### **MM35 Policy 27: Local Green Space**

We support the amendments to this (and related policies) but query Policy 32 wording of the following sentence. Could it be clearer if the suggested further amendment (red) was made?

Applications will be considered for additional Local Green Space Areas to be designated with regard to paragraphs 143-147 of the National Planning Policy Framework

#### **MM36 Policy 28: Green Infrastructure Assets**

We welcome the addition of the following in policy wording:

- g) Golf Courses (Beeston Fields and Chilwell Manor); and
- h) A mix of Informal Open Spaces and flood mitigation measures (land off Thorn Drive, Newthorpe).
- i) Prominent Areas for Special Protection (Bramcote Hills and Bramcote Ridge; Burnt Hill, Bramcote; Catstone Hill Ridge, Strelley; Stapleford Hill; and Windmill Hill, Stapleford).

#### **MM37 Policy 31: Biodiversity Assets**

We welcome inclusion of reference to Net biodiversity gain and protected and declining species and to NERC Act Species / Habitats and Local BAP in the policy text. This strengthens the policy in relation to biodiversity.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

**Ben Driver**

**Senior Conservation Officer (South)**

[REDACTED]  
[REDACTED]



Nottinghamshire Wildlife Trust is the county's largest environmental charity - run by local people for the benefit of local wildlife. We manage nature reserves across the county, champion nature and inspire adults and children about the natural world. Together we are working to create a Living Landscape for Nottinghamshire.

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Registered office: The Old Ragged School, Brook St, Nottingham NG1 1EA  
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# Main Modifications 38

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<del>Mr</del> <del>Mrs</del> Miss <del>Ms</del> Other:
Name	ROSAMUND Worrall
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

**Responses should be limited to the Main Modifications.**

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?

Yes ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

3

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM3 - policy 3.1 Chetwynd Barracks

HE Supports the additional information in respect of designated and non-designated heritage assets.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input checked="" type="checkbox"/> Mr <input checked="" type="checkbox"/> Mrs <input type="checkbox"/> Miss <input checked="" type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	ROSAMUND WORRALL
Organisation (If responding on behalf of an organisation)	HISTORIC ENGLAND
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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MM

11

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

3. If you object it will help if you can say why

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It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

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It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM 11 - Policy E.1 Land west of Aunsnorth

He supports the additional information in respect of Bennerley Viaduct.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

Your Details

Title	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input checked="" type="checkbox"/> Ms <input type="checkbox"/> Other:
Name	ROSAMUND WORRALL
Organisation (if responding on behalf of an organisation)	HISTORIC ENGLAND
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MM

12  
(Please see consultation document)

2. Do you support or object to the Main Modification?

Support ☒

Object ☐

3. If you object it will help if you can say why

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It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM12 - Policy S.1 East of Church Lane, Brinsley

H&E supports criteria 4 and the use of 'conserve' instead of 'preserve' in line with NPPF terminology.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input checked="" type="checkbox"/> Ms <input type="checkbox"/> Other:
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Yes ☒

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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

32

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support

☒

Object

☐

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The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

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☐

It is not effective i.e. it won't work

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It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM 32 - Policy 23: proposals affecting designated and non-designated heritage assets.

HE supports clarification about assessment of harm in Part 2 and the use of 'conserve' instead of 'preserve' in Part 3 all in line with NPPF requirements and terminology.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

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Title	Mr Mrs Miss Ms Other:
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1. Which Main Modification does this response relate to? (please complete a separate form for each Main Modification that you wish to comment on)

MM

38

(Please see consultation document)

2. Do you support or object to the Main Modification?

Support



Object

☐

3. If you object it will help if you can say why

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification ☐

It is not positively prepared e.g. strategy will not meet development needs ☐

It is not effective i.e. it won't work ☐

It isn't consistent with national policy ☐

It doesn't comply with the law ☐

4. Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

MM38- Policy 32: Develop Contributions

HE supports the inclusion of criteria 1i in respect of the historic environment, heritage assets and setting.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

Other



# Part 2 Local Plan Main Modifications Consultation Response Form



**Broxtowe  
Borough  
COUNCIL**

Agent (if applicable)

Please provide your client's name	Hillside Gospel Hall Trust
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## Your Details

Title	Mr Mrs Miss Ms Other: Mr
Name	Guy Longley
Organisation (if responding on behalf of an organisation)	Pegasus Planning Group Ltd
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

**All comments must be received by 5pm Tuesday 9 July 2019**

***Responses should be limited to the Main Modifications.***

*Comments will be considered by the independent Planning Inspector who is undertaking the examination of the Plan.*

Do you want to be contacted by the Planning Policy Team regarding future Planning Policy consultations?	Yes <input checked="" type="checkbox"/>
Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: _____	

For guidance on this Consultation, please refer to the accompanying 'Main Modifications Consultation – Guidance Sheet'. For any further information or assistance in completing this form please contact the Planning Policy Team on the numbers or e-mail below.

For more information including an **online response** form please visit:

**[www.broxtowe.gov.uk/part2localplan](http://www.broxtowe.gov.uk/part2localplan)**

<p><b>Data Protection</b> - Information will be used by Broxtowe Borough Council for Local Plan and Neighbourhood Plan purposes. Representations will be made available on the Council's website. Full representations and all information provided will be available to view on request.</p> <p><b>By submitting this response form you are agreeing to these conditions.</b></p>
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**Please return completed forms to:**

Broxtowe Borough Council, Planning Policy, Chief Executive's Department, Neighbourhoods and Prosperity, Foster Avenue, Beeston, Nottingham NG9 1AB

**For more information:** Tel: 0115 917 3452, 3448, 3015, 3409 or 3337 E-mail: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)

1. **Which Main Modification does this response relate to?** (please complete a separate form for each Main Modification that you wish to comment on)

MM

ID 6 Modifications to the Proposals  
Map - Green Belt

(Please see consultation document)

2. **Do you support or object to the Main Modification?**

Support

☒

Object

☐

3. **If you object it will help if you can say why**

The Examination Inspector is required to consider whether the Part 2 Local Plan has been properly prepared against tests set out in the [Government's National Planning Policy Framework \(2012 version\)](#) (paragraph 182). (If possible, please tick any which apply.)

It isn't justified e.g. there is no evidence to justify the modification

☐

It is not positively prepared e.g. strategy will not meet development needs

☐

It is not effective i.e. it won't work

☐

It isn't consistent with national policy

☐

It doesn't comply with the law

☐

4. **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification (continue on separate A4 sheet(s) if necessary)

If you wish to comment on more than one Modification please use a separate form for each.

The Main Modifications include a number of Proposed Modifications to the Proposals Map. Plan ID 6 shows modifications to the Submission version of the plan in relation to the Green Belt at Bramcote. This shows land to be removed from Green Belt to reflect the allocation of housing site 3.3 and to accommodate the associated school and leisure centre development. The proposed modification of the Green Belt to remove the Gospel Hall Trust land from the Green Belt is supported.

It is noted that the existing dwellings to the east of the Gospel Hall Trust Land are shown as being retained in the Green Belt. Given the removal of the adjoining Gospel Hall Trust land and the residential use of these properties, the inclusion of these properties in Green Belt is considered to be inappropriate.

The existing extent of the Green Belt is included in the adopted Broxtowe Local Plan 2004. The Part 2 Local Plan needs to be clear about the areas of land where the Green Belt designation is to be altered from the 2004 adopted plan. The changes set out in ID 6 show changes from the Submission Plan, which already showed changes to the extent of the Green Belt. For clarity, plans should be included in the Part 2 Plan showing the land that is removed from the Green Belt as designated in the 2004 Local Plan.

This form is available in large print and other formats on request.

Please use a separate sheet of paper if required.

## Genway, Tom

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**From:** Genway, Tom  
**Sent:** 04 June 2019 15:10  
**To:** [REDACTED]  
**Cc:** Lawson, Dave; Fardell, Matthew  
**Subject:** RE: Part 2 Local Plan: Main Modifications Consultation  
  
**Importance:** High

Dear Mr Kiddie,

Thank you for your email.

I am very sorry that you found the email difficult to understand / interpret. Unfortunately, there is a certain amount of legal information which we are obliged to include.

The email relates to the preparation of Broxtowe Borough Council's Part 2 Local Plan, which will set out the 'site allocations' (e.g. sites for new housing, employment etc.) and the development management policies (which will be used to determine planning applications) within the Borough for the period until 2028. There are several stages to the preparation of the Plan, which we are required by law to follow.

Broxtowe's Part 2 Local Plan was submitted for 'examination' (which is a process of assessment by an independent government-appointed planning inspector) in August 2018 and public hearings took place in December. The examination process is being carried out by Helen Hockenhull who is an independent planning inspector, and who must determine whether the Plan is 'sound' (this basically means ensuring that the policies of the Plan are likely to achieve what they set out to achieve and that they are the best options to accomplish this). and complies with the legal requirements (for the production of such Plans).

Following the public hearings, the inspector has now asked that consultation be carried out on the 'Main Modifications' which may be necessary to make the Plan 'sound' and / or legally compliant. These are the changes to the policies of the Plan which she considers necessary or which the Borough Council has proposed within the last year or so. We are now inviting comments on these 'Main Modifications' to the Plan. All of the documents can be viewed on our website at the following link: <https://www.broxtowe.gov.uk/part2localplan>.

I hope this clarification is useful. Should you require any further information or assistance, please do not hesitate to contact me and I will be very happy to explain this further.

Many thanks  
Kind regards  
Tom

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Tom Genway MRTPI  
Senior Planning Policy Officer  
[REDACTED]

Broxtowe Borough Council  
Neighbourhoods & Prosperity  
Chief Executive's Department

**From:** [REDACTED]  
**Sent:** 29 May 2019 14:19  
**To:** Policy  
**Subject:** Part 2 Local Plan: Main Modifications Consultation

Dear Sir/Madam,

Back in August 2018 I must have made a comment or made complaint about the above plans.

I have received the '**Part 2 Local Plan: Main Modifications Consultation**' issued 24<sup>th</sup> May 2019.

I have read the letter, I have been on the internet site, [www.broxtowe.gov.uk/part2local](http://www.broxtowe.gov.uk/part2local) plan so as to be further informed of these modifications and can find nothing that I recognise.

Would it such a huge task to state precisely what project you are referring to under the main heading, instead of hiding amongst all jargon references that mean absolutely nothing to the man in the street.

Maybe that is the intention, hide the details and then no one can complain because they can't find what it is they want to complain about.

One last thing, the letter is addressed to Mrs Kiddie, when it I that would have made the comment.

Yours extremely unhappy

I D Kiddie