



HOUSE OF COMMONS
LONDON SW1A 0AA

2nd October 2011

As the Member of Parliament for Broxtowe I wish to make the following comments and representations as part of the "public consultation" on the Broxtowe Aligned Core Strategy Document as compiled by Broxtowe Borough Council:

Development and Broxtowe's approach

Development is not simply about building more houses; it is also about the creation of economic growth through provision for business, the building of facilities and services to be enjoyed by the community, improvement of infrastructure and the improvement of our environment. In short, it is about sustainable development.

Over the years the green belt in Broxtowe has shrunk as we have built more houses, providing homes in the main for middle income earners working outside the Borough's boundaries, notably in Nottingham. The result is that Broxtowe is now the most densely populated area in Nottinghamshire. For some time, development has been largely seen as the building of more houses with poor s.106 agreements, resulting in little improvement in infrastructure and insufficient green open spaces, community facilities and business opportunities. In my view, Broxtowe has tended in recent years to build large "slabs" of housing, in filling existing housing developments, but with little done to integrate those new developments with the existing stock, to create real communities and to provide jobs.

Despite a golden opportunity to break with the past and to seize the future provided by the Localism Bill, Broxtowe seems determined to continue the mistakes of the past.

Broxtowe is right to begin to compile a Local Plan, but wrong to rush the process so as to avoid the Localism Bill. In any event Broxtowe has, in my view, approached the entire process on the wrong basis and the public consultation is fundamentally flawed.

The acceptance of housing figure targets

The letter dated July 22nd 2011 and sent to those who had made submissions in response to the last "public consultation", makes it clear that Broxtowe Borough Council has accepted a housing target from the RSS of 5,765 and continues to play a leading role in the Greater Nottingham Core Strategy. Most significantly the Greater Nottingham Joint Planning Advisory Board which has determined the housing figures is chaired by Councillor Steve Barber who also chairs the Borough Council's Development Control Committee.

The letter states,

" a review of the evidence (on predicted housing need) has led to Broxtowe Borough Council, alongside Erewash Gedling and Nottingham City councils, to decide that housing figures set out in the ' Option for Consultation' continue to be the appropriate ones to plan for."

The letter goes on to make clear that the land north of Toton and Field Farm are the Council's "preferred sites". The letter fails to mention the total figure but does break it down, concluding that when brown field land and the "preferred sites" are taken into account, *"the council will need to find land for a minimum of 1770"*.

A flawed approach to consulting with residents throughout the Borough

Instead of working with local communities to determine how much sustainable development is needed and how it can be achieved with common consent, Broxtowe has adopted the opposite approach. The former is the approach favoured by neighbouring Rushcliffe Borough Council and it is of significant note that Rushcliffe has not accepted the figures set by the RSS.

The above mentioned letter makes it clear the figures have been accepted by Broxtowe. At the two public meetings I attended, and from correspondence from constituents who attended other meetings, attendees were left in no doubt that the figures had been accepted and the "consultation" was only as to where the houses would be built.

We were all told that if we rejected a particular site or sites we should choose an alternative within the Borough. In effect communities have been set against each other, something which I and others find particularly objectionable.

Residents were shown maps with sites highlighted which they were told were suitable for development. Officers struggled to answer questions about how the infrastructure could cope with the huge increases, how schools might accommodate the increase in numbers, the effect on the environment and the like.

The result was that residents were left feeling it was a "done deal" and that their views and concerns counted for nothing.

Broxtowe has placed the various documents that form part of the "public consultation" in public libraries. There has been information on the Borough web site under the heading "Core Strategy". Some Borough Councillors, notably in Toton and Nuthall West, leafleted homes to inform them of the "consultation". In Nuthall West (which includes Watnall) residents were urged to attend the Parish Council's meeting with an officer from the Borough Council.

In Toton, Borough Councillors and I called our own public meeting after two "exhibitions". In Stapleford, Bramcote and Trowell the Council's plans were discussed at CAT meetings and in Greasley and Kimberley at the respective Parish and Town Council. There has been no such consultation in the rest of the Borough – notably Beeston and Chilwell.

Council notice boards were not used to alert residents to the plans and to my knowledge neither was the media.

The consultation was launched at the end of July when many people are on holiday, concluding at the beginning of October; in effect the "public consultation" was some four weeks.

The various documents and the form to be completed are not in plain English, but are complicated and technical.

Broxtowe's approach means the overwhelming majority of people in the Borough have little, if any, idea that the Borough Council is consulting on the re drawing of their green belt.

Those "exhibitions" and meetings that were held left residents feeling their views counted for nothing faced with figures that had been accepted, sites that had been "preferred" and questions and concerns unanswered.

The situation is perhaps best summed up by events in Kimberley. The Council's web site advertised a "public meeting" on the evening of September 29th (just four days before the close of the consultation) and members of the public and I attended. In fact, the event was a meeting of the Town Council with half an hour set aside for them to discuss the Council's plans with an officer. The Town Council had not been informed it was meant to be a "public meeting"; no room had been booked and nothing had been



organised to involve the public. The Chair of the Town Council apologised profusely, though the fault was neither with him nor his Council. Neither Borough Councillor who attended the Town Council meeting knew anything of a "public meeting".

The better approach

I believe Broxtowe should reach its own conclusion as to predicted housing need; based on co-operation with communities, the availability of non-green belt land and any other evidence relevant to the Borough. Broxtowe should have firstly approached Parish and Town Councils and CATs to canvass their views on the need in their areas for sustainable development. They should have been consulted about their perceived need for new housing (notably affordable housing and social housing), in what way and to what extent the infrastructure needs improvement, what services and facilities (especially schools) were in need of improvement, the adequacy of existing green open spaces and how their environment might in other ways be improved.

I see no reasons why these various bodies could not have been asked to consult with all residents within their area as part of this process. It would soon have become clear where neighbourhood plans might be effective as provided for in the Localism Bill and this approach would, in any event, be a more positive way of working with people and their representatives to achieve sustainable development.

National policy

The Government's Draft National Planning Policy Framework encourages local authorities to determine a local plan. The document is clear that the Government encourages sustainable development - however it is equally clear that the green belt should continue to have its current protection. There have been a number of statements from the Prime Minister, the Secretary of State for Communities and Local Government and the leader of the House of Commons that the Government will continue the last administration's policy of special protection for green belt land.

The Localism Bill will complete its passage through Parliament in the next few months. It transfers power back to local authorities and communities. It abolishes the RSS and their housing targets and in combination with the National Planning Policy Framework places the burden of determining housing need on the relevant local authority.

The Localism Bill, inter alia, encourages neighbourhood plans, devolving decision making about future development even further into local communities.

Given all of the above I am drawn to the conclusion that Broxtowe has chosen its approach in order to escape the powers and effect of the Localism Bill. My very real concern is that Broxtowe has found itself doing Nottingham's bidding.

General objection to all sites located in the green belt

I can see little merit in any development on any of the Borough's green belt. In short for the following reasons:

- (a) Broxtowe's green belt is in particular need of protection given we have little enough of it. In particular it defines towns like Stapleford and Kimberley and communities like Watnall, Nuthall and Toton and villages such as Trowell, Awwsworth and Cossall.
- (b) Parts of our green belt are particularly attractive with strong historic links (in particular the land between Watnall and Greasley).
- (c) In general the green belt in Broxtowe prevents urban sprawl and maintains the identity of communities, it provides much needed and valued open green spaces, it is enjoyed by residents from within and outwith the Borough and acts as "green lungs" in the sprawl from the City of Nottingham to the Derbyshire border.
- (d) Chilwell enjoys considerable benefit from the green belt – not only as an amenity but also to preserve what identity it has left. The same is true for Bramcote and whilst Beeston has no green belt on its borders I have no doubt its residents value the borough's green belt for all the reasons I have identified.
- (e) Broxtowe's infrastructure, notably our roads, is already heavily congested. There is little or any plan as to how development on such a scale as is planned by Broxtowe would improve our infrastructure.
- (f) There are no plans to develop or encourage any business opportunities
- (g) There are no plans to improve our services or communal facilities
- (h) There are no plans as to how our environment will be improved or in any way strengthened.

Objections to, and comments on, particular sites

Fields north of Toton

This is green belt land used by a significant number of residents for recreational purposes.

In particular, this land separates Toton and Stapleford. Toton has suffered from sprawl into Chilwell and out towards the Derbyshire border. Stapleford has suffered from sprawl into Bramcote and towards Trowell and towards Toton.

The proposed 800 houses (there has been no suggestion it might be less) will have a profound effect on the area's roads which are already heavily congested, especially at rush hour times. Stapleford Lane is a particular problem; there is existing concern as to how dangerous it is for pedestrians seeking to cross it and it is of course a major route for pupils walking to and from George Spencer Academy.

There are no plans to expand the schools in Toton which are already under pressure.

Field Farm

Again, this is important and much appreciated green belt land which defines and separates Trowell from Stapleford. Again, existing roads are heavily congested and frankly are already inadequate – there are no plans to improve these roads and it is difficult to imagine how those roads could cope with any new housing.

Field Farm has lain fallow for many years meaning it has attracted considerable amounts of wild life. There is at least one highly attractive public footpath across the land which is used by walkers and provides a route to the old Nottingham Canal area which is particularly attractive.

I find Broxtowe Borough Council's approach to any development on this land particularly woeful. Instead of working with the community to achieve sustainable development to enhance the area with affordable housing and new jobs whilst retaining wildlife and protecting the enjoyment of this stretch of our countryside, the Council has alienated the local community.

Sites in and around Greasley, Watnall and Hucknall

In addition to my general objections, this area contains some of the most scenic and historic green belt in the Borough.

The green belt also provides a critical role in retaining what is left of the communities of Watnall, Greasley/Newthorpe, Nuthall and Kimberley. Any development would be nothing short of more "urban sprawl" especially to the east into the City and towards Hucknall.



The roads are again already overly congested and it is simply impossible to imagine how the Nuthall roundabout could cope with anymore traffic (it is important to note the City Council's plans to allow a large housing development off Coventry Lane which will add considerably to the current over congestion). Again, there are no plans for business and jobs, more community facilities and services and no vision of a better environment.

Kimberley

I believe Kimberley needs jobs more than large numbers of housing. The town's roads cannot bear any more traffic and what is proposed is yet more of the same badly designed housing developments with no concept of sustainability and integration into the community. I think the lack of vision and understanding of the needs of Kimberley is summed up by the fact that the former Brewery site which offers real sustainable development for the town has been ignored. This site can and should be offering not just more housing, but also more business growth and therefore jobs and more community facilities especially to mark the town's history and culture. Part of the site could be considerably enhanced on environmental grounds and there are many who would wish to see the tram system extended to include the former railway cuttings. In short there is real potential for sustainable development in Kimberley and the current approach from the Borough Council is missing a real opportunity.

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