

Broxtowe Borough Council, Aligned Core Strategy, Publication Version, Response Form

Paragraph 8

Please explain why you consider the Aligned Core Strategy to be unsound or not to be legally compliant.

Legally Compliant

A. Community Consultation

There has been a profound lack of consultation by Broxtowe Borough Council.

- (a) In **2009** the Borough Council mailed out a consultation document to every household. These forms were, as ever, technical and complicated. From June 15th to August 14th there were some 15 CAT (Community Action Team meetings which are at their heart public meetings), Town and Parish Council meetings to discuss with planning officers the "Issue and Options" document.
- (b) From February 15th to May **2010** there were another round of meetings ; 12 between officers and Town and Parish Councils and three Public meetings Toton (which I attended), Stapleford and Trowell. The Toton public meeting was attended by 150 people and there was widespread dismay at plans to build on Green Belt land to the north of the area.
- (c) "Public consultation" on the sites put forward in the SHLAA began on July 25 **2011** and because of political pressure that the time period was essentially over the summer holidays, it was extended to October 3rd 2011. There were 4 CAT meetings (none in Toton), 6 Parish and Town Council meetings and 3 "pop in" public exhibitions.
 - The Toton "pop in" was organised at short notice by the Borough Council and advertised by local Councillors and myself and a local campaign group (TEPS). Planning officers attended and there was considerable anger at what residents believed was a "done deal". We were told what the housing target was for the Borough (over 6,000 houses) and given a list of sites which would be developed and it was made clear Green Belt land at Toton was a certain site for development. There was no consultation whatsoever.
 - Nuthall Parish Council organised a public meeting with a planning officer. Again the only question was "where" – the target had been fixed.
 - At Kimberley Town Council three members of the public attended what we thought was a public meeting. A planning officer attended but the Town Council had not been informed that he was going to explain the Core Strategy, target and sites to them, so as there was no room on the agenda; that concluded public consultation in Kimberley until July 17th 2012.
 - I attended a CAT meeting in Stapleford where again, Borough Councillors told the audience there was no alternative, the target had to be agreed and Field Farm would be developed.
 - I held a public meeting in a Stapleford pub, after just a couple of people (STRAG) had dropped leaflets through letterboxes. It was packed out; people were angry about the lack of consultation and totally opposed to building on Field Farm.
 - Greasley Parish and Borough Councillors held a public meeting attended by over 150 people – again there was anger at the lack of consultation and opposition to any build on any Green Belt land.

Only people who had responded to the original 2009 survey were contacted about the SHLAA consultation. Unless pressure groups or Councillors or Town or Parish Councils organised public meetings there was no meaningful effort by the Borough Council even to consult. The overwhelming view of anyone who attended any meeting with planning officers was “it’s a done deal; they are not interested in my view.” People took offence to a section of the document that asked respondents to select alternative sites to the one they objected to. This pitching of one community against another was not only immoral but has distorted the published findings.

- The attitude of Broxtowe Borough Council was and remains that somehow posting material on their web site or placing documents in the Borough’s Libraries amounts to public consultation. They seem oblivious to the fact that their residents do not visit their web site regularly and although our Libraries are popular you had to know the documents were there to be able to view them!
- I should add that the Nottingham Post covers most of the county of Nottinghamshire so could not be considered a Broxtowe newspaper. The Beeston Express is a one person operation, fortnightly paper with a circulation of less than 2,500 in the Beeston area. The Ilkeston Advertiser and Eastwood and Kimberley Advertiser serve their respective communities in the north of the Borough (though Ilkeston is in Derbyshire and not Broxtowe).

(d) This consultation opened on June 11 **2012**. It was made very clear to me by a senior planning officer that my constituents had to fill in the form and had to abide by the technical and prescriptive nature of this form – letters would be ignored.

Again there has been anger as people feel they have no real say. Broxtowe Borough Council’s leaflet delivered (supposedly) to every home either has not been received or has been enclosed in “junk mail” in the overwhelming majority of homes.

There have been public meetings organised by local campaign groups and/or myself but not by the Borough Council.

- At Nuthall 150 people attended a public meeting organised by Borough and Parish Councillors. Few people had received the Borough Councils leaflet and there was anger that Nuthall had been put with “Kimberley” with no sites identified.
- At Greasley over 200 people packed the Parish Hall. They were angry at the lack of consultation (less than half a dozen, on a show of hands said they had seen the Borough Council’s leaflet) and passionately opposed to any extension of the Green Belt boundary. There was real anger that Greasley had been put in a red highlighted area called “Eastwood” with no sites identified.
- At Toton over 100 people were cross at the lack of consultation and remain opposed to any build on their Green Belt.
- At a meeting on July 17th in Kimberley Parish hall over 150 people had had no idea that 600 houses were earmarked for Kimberley. The Town Council (which includes all three Borough Councillors) has not made any submission, though I hope that has now been rectified. Again there was anger at the lack of consultation and opposition to the housing target of 6,150 and 600 on unspecified sites in “Kimberley”.

Soundness

A. Positively Prepared

- (a) Broxtowe Borough Council decided to be part of the Greater Nottingham Joint Planning Advisory Board. In 2008/9 the JPAB accepted the previous Government's RSS figures with Broxtowe agreeing to be part of one housing market along with the other component Councils. Together they established the process to identify what sites were available to meet the RSS target for Greater Nottingham (Issues and Options 2009).
 - (b) In 2010 Rushcliffe withdrew from the JSAB and decided to determine its own housing target. Broxtowe was urged to follow Rushcliffe's lead by myself and the leader of the Conservative Group on the Council, Councillor Richard Jackson but chose to remain as part of the JPAB. With the election of the Coalition and the emergence of the Coalition agreement and subsequent passage of the Localism Bill, Broxtowe has been urged by me on many occasions to work with communities within the Borough and create Neighbourhood Plans as part of the Core Strategy.
 - (c) At no stage has there been any assessment of the housing needs for the Borough of Broxtowe.
 - (d) There is no basis, evidential or otherwise upon which the overall housing target has been divided between the component Councils.
 - (e) The Core Strategy remains almost mute on assessing, recognising or identifying the need for jobs, services or infrastructure of Broxtowe and I refer to my comments on the policy section.
- I believe Broxtowe is in danger of losing a golden opportunity to develop a number of important communities in Broxtowe – notably at Kimberley where the extensive former brewery site has laid dormant since its closure in 2007. It is difficult to imagine a better candidate for a Neighbourhood Plan especially given the enthusiasm of the people of Kimberley and certainly in the past, their equally enthusiastic and pioneering Town Council.
 - I do not represent the town of Eastwood so it would not be appropriate for me to comment other than that I represent Greasley, Giltbrook, Newthorpe and Moorgreen and there has been considerable coalescence over the years. So I believe I have some locus in stating the profound need for a strong Neighbourhood Plan at Eastwood, which I do not believe has even been suggested.
 - Stapleford is another town greatly in need of rejuvenation and redevelopment. However, the Core Strategy identifies Green Belt land to the north of the town as the first site suitable for development as a SUE. Again there has been no attempt to create a Neighbourhood Plan; no mention of jobs or business development, no new services or road improvements to the already heavily congested Ilkeston Road, Trowell Road and Coventry Lane. I should make it clear there is considerable opposition to any movement of the Green Belt. Accordingly I adopt the submission made by STRAG and/or Jennie Philips of Stapleford.
 - Beeston is currently subjected to the extension of the tram line to Toton resulting in considerable work within the town. Again, no Neighbourhood Plan has even been suggested; a great opportunity has again been lost to look at how housing, jobs, services and infrastructure could all be developed in the forthcoming decade. Again I refer to my previous comments in the Policy section.
 - There are other communities which may well have welcomed the opportunity to take part in developing and moulding their future. I adopt in this submission the enclosed letter from Trowell Parish Council as it may in its original form not comply with the strict requirements of this stage of the consultation process. Awsworth is a ideal candidate for a Neighbourhood Plan - again it has never been suggested by the Borough Council until May of this year and not directly to the Parish Council.

B. Justified

- (a) The Core Strategy is not based on robust or credible evidence.
- (b) Broxtowe should determine its own housing needs. The recent results of the 2011 Census reveal a 1.9% growth in population in the Borough and a 13.7% growth in Nottingham.
- (c) Several pieces of information lead me to doubt the adequacy of a target figure of 6,150 houses for Broxtowe.
 - One way in which the RSS figure of 6,150 is not relevant is that the Regional Strategy was prepared using 2004-based Household Projections.
 - In addition, the Housing Background Position Paper shows that it would ostensibly be credible to have a lower predicted housing figure than predicted in the Core Strategies (HBPP, p.7 Table 1). Moreover, the conclusion in the Housing Background Position Paper was reached on a predicted population of 111,800 in 2010, a figure stated in the Core Strategy (2.71).
 - As the 2011 Census results show, Broxtowe's population in 2011 was 109,500 having increased from 107,500 in 2001; this leads me to further doubt the relevance of a target figure of 6,150 for Broxtowe

C. Effective

- (a) There are neither plans nor any details to improve the infrastructure to cope with 6,150 additional homes. Infrastructure problems at Field Farm have been identified above.
- (b) Aligned Core Strategies Spatial Vision states at 2.3.10

“The principle of the Green Belt remains..especially with regard to its key purpose of preventing coalescence of Nottingham and Derby”

It could be said this statement is somewhat at odds with an acceptance of a target of 6,150 and consequences for Green Belt land in Broxtowe.

D. Consistent with national policy

- (a) The Core Strategy is totally at odds with the NPPF and those sections that deal with Green Belt namely
 - Paragraphs 79 – 92 (Protecting Green Belt land)
 - Introduction paragraph 2
 - Paragraph 14 and footnote 9.
- (b) The Core Strategy has not established a housing need in Broxtowe that amounts to an exceptional or very special circumstance. Indeed there is no evidence of Broxtowe's housing need.
- (c) There is a marked absence of Neighbourhood Plans because Broxtowe Borough Council refused to consider them until May 2012 and only published an unspecific document in July 2012.

In numerous letters I have reminded every Borough Councillor of the relevant section of the NPPF both in its draft and final version and the comments of various Ministers, following correspondence between myself and Ministers and a number of debates in Parliament.

* The applicant is my constituency office landlord, Mr. Simon Barton.