

# Broxtowe Part 2

## Local Plan

### Agent

Please provide your client's name

### Your Details

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Organisation (if responding on behalf of the organisation)	Chetwynd: The Toton and Chilwell Neighbourhood Forum
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### Comments should be received by 5.00pm on Friday 3 November 2017

If you wish to comment on several policies, paragraphs, or sites, please use a separate form for each representation.

If you would like to be contacted by the Planning Policy Team regarding future consultations.

**Please tick here**

Yes

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

[graham.heal00@gmail.com](mailto:graham.heal00@gmail.com)

**Question 1: What does your comment relate to? Please specify exactly**

Document	Policy number	Page no	Policy text / para no.
<b>Part 2 Local Plan</b>	<b>Policy 1: Flood Risk</b>	<b>20</b>	<b>Para 1.4</b>
	Policy 2: Site Allocations		
	<b>Policy 3: Main Built up Area: Policy 3.1</b>	<b>30</b>	<b>Pol 3.1, Para 3.5</b>
	<b>Policy 3: Main Built up Area: Policy 3.2</b>	<b>81</b>	<b>Para 3b.6, 3b.7</b>
	Policy 4: Awsworth		
	Policy 5: Brinsley		
	Policy 6: Eastwood		
	Policy 7: Kimberley		
	Policy 8: Development of Green Belt		
	Policy 9: Retention of ...employment sites		
	Policy 10: Town Centre ...uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge of Centre, Eastwood		
	Policy 13: Proposals.....		
	Policy 14: Centre....		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	<b>Policy 17: Place-making, design &amp; amenity</b>	<b>111</b>	<b>Pols 1, 2</b>
	Policy 18: Shopfronts....		
	Policy 19: Pollution, Hazardous Substances		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	<b>Policy 23: Proposals affecting designated...</b>	<b>124, 125</b>	<b>Para 23.1, 23.2, 23.5</b>
	Policy 24: The health impacts of....		
	<b>Policy 25: Culture, Tourism and Sport</b>	<b>152</b>	<b>Pol 1, 2 Para 25.1</b>
	<b>Policy 26: Travel Plans</b>	<b>153</b>	<b>Para 26.1</b>
	<b>Policy 27: Local Green Space</b>	<b>155</b>	<b>Para 27.5</b>
	<b>Policy 28: Green Infrastructure Assets</b>	<b>157, 158</b>	<b>Pol 1.b, Para 28.2, 28.5</b>
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
<b>Policy 32: Developer Contributions</b>	<b>171</b>	<b>Para 32.1</b>	

Policy number	Page number	Policy text / Para number
<b>1 Flood Risk</b>	<b>20</b>	<b>Para 1.4</b>

### Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		<b>X</b>

### Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	<b>X</b>
It is not positively prepared	
It is not consistent with national policy	

### Your Comments:

#### Resident's comments:

*"There is already serious flood risk in the Erewash Valley at Toton Sidings. Adding new housing in the area will only increase the risk of flash flooding in the area especially nearby houses on Goodwood Road and side roads."*

*"All housing should have solar panels + rain water harvesting systems built-in."*

1. We are seriously concerned with the increased risk of flash flooding that development in and around Toton Sidings will cause. We believe para 1.4 needs to be strengthened to reflect the specific risk in the Sidings due to not being currently defended by flood protection measures
2. A resident has suggested all new housing (and by extension, commercial developments) should have solar panels & rain water harvesting systems incorporated 'by default'. It is not clear where this suggestion should be included in our response but added here following advice by Steffan Saunders on Oct 30<sup>th</sup>. Solar panels and water harvesting systems clearly have a role to play in reducing carbon dioxide emissions. We would like to see a positive 'Justification' paragraph that encourages the incorporation of these systems where feasible.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

**Amend para 1.4 to:**

1.4 With regard to point 4 of the policy, flood mitigation will be required in all cases (whether the site is defended or not). Examples of mitigation include flood resistance/resilience measures, emergency planning and good site design that does not increase risk to others. The Environment Agency will also require flood compensation (i.e. at least equivalent replacement of lost flood storage) in areas, ***such as the Erewash Valley at Toton Sidings***, which are not defended by an appropriate standard of flood protection (such as the Nottingham Trent Left Bank Flood Alleviation Scheme).

**Create new para to state something along the lines of:**

***1.n The Council recognises the impacts of Climate Change – as detailed in Aligned Core Strategy Policy 1: Climate Change – and wishes to encourage the reduction of carbon emissions through the installation of renewable energy solutions such as solar panels and rain water harvesting systems in [set % aspiration] of new housing and all new commercial developments.***

Policy number	Page number	Policy text / Para number
<b>3.1 Chetwynd Barracks</b>	<b>30</b>	<b>Policy 3.1 / para 3.5</b>

### Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		<b>X</b>

### Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	<b>X</b>
It is not positively prepared	
It is not consistent with national policy	

### Your Comments:

Residents' comments include:

*"[...] Barracks to be treated as one entity and not split up into separate development plots"*

*"Keep Chetwynd Road [Chilwell] closed." "Chetwynd Road: make it a cycle & pedestrian route only?" "Chetwynd Road to be opened both ends to share new traffic load."*

*"Keep Hobgoblin wood." "Keep trees on the west side of Barracks - from the quarry upwards."*

*"All large trees on the Barracks to be the subject of tree preservation orders"*

*"New feed Road into Depot from Bardills essential (with Tram/Bus/Cycle links?)"*

*"Re-route Erewash Country trail & public footpath down through the eastern edge of the Barracks site to exploit a newly created green corridor"*

*"Sports provision needs to be included on the Barracks site to protect current facilities"*

*"[...] War memorial must be protected and given plenty of space. [...]:"*

1. Fourteen residents specifically commented on Chetwynd Barracks – although all comments submitted were, of course, triggered by future developments of the Barracks and HS2 Station. Some comments were contradictory (opening Chetwynd Road, Chilwell) but this is not surprising given the impact the development of the site will have and the depth of feeling by residents.
2. Specific additions to Policy 3.1 (para 3.5) are therefore sought to strengthen current requirements

## Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

### **Amend Policy 3.1 (at para 3.5) to:**

3.5 The following key development requirements must be met.

#### Key Development Requirements:

- 500 Homes (within the plan period), 800+ overall.
- ***The Barracks must be treated as one entity and not split up into separate development plots***
- Provide attractive and convenient walking and cycling connections to the proposed HS2 station and to the tram.
- Provide a bus route through the site, ***including access to the site from Chetwynd Road, Chilwell. However, only buses should be given access to the site from this eastern gateway.***
- ***New access road is needed to the site from the north to fall in line with HS2 Growth Strategy***
- Retain and enhance Green Infrastructure corridors around the eastern and northern areas of the site ***including the creation of footpaths and cycle ways***
- Provide a new Primary School within close proximity to the open space at the east of the site.
- Link open space at the east of the site.
- ***Enhance the provision of sports facilities at the south east of the site***
- Retain existing large trees and grass verges and incorporate these into a boulevard approach to the street scene. ***All large trees on the Barracks will be subject to Tree Preservation orders once the site is released***
- Provide public access to the ***Listed Memorial, the associated gardens and all heritage assets (still to be formally registered) on the site***
- Provide public space to the south of the memorial and retain/enhance the existing memorial garden.
- Provide ~~small~~ retail/service centre ***sufficient*** to meet local need along the main through route.
- Provision of small scale employment development.

Policy number	Page number	Policy text / Para number
<b>3.2 Land in vicinity of the HS2 Station at Toton</b>	<b>81</b>	<b>3b.6 &amp; 3b.7</b>

### Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		<b>X</b>

### Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	<b>X</b>
It is not positively prepared	
It is not consistent with national policy	

### Your Comments:

#### Residents' comments:

*"If residents only parking is introduced, it needs to be at zero cost to residents"*

*"Size of the depth of the "green corridor" to the south of the boundary and definitive information as to whether this corridor is STRICTLY for wildlife or inclusive of pedestrian access? Further, some categorical assurance as to who will be responsible for the ongoing maintenance of hedges and vegetation?"*

*"I work between Derby/Notts + London. HS2 + business development in Toton is greatly needed!"*

1. Parking by HS2 station users must not overspill into neighbouring residential streets – as detailed in last bullet of para 3b.6. It is suggested that a 'residents only parking' system may be the solution to this issue. However, we need to ensure residents are not disadvantaged by any such scheme.
2. Viable green corridors on the site (especially the southern boundary) must be considered a mandatory requirement of any development proposals – as outlined in para 3b.7. This para needs to be strengthened to include a minimum width of the primary corridor to the southern boundary. The corridor to the northern boundary (south of Stapleford) is less important, given the likely creation of HS2 station access roads, so this can be treated as an 'informal greenspace' corridor.

#### Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

##### **Amend para 3b.6 to:**

###### **3b.6 Aspirations (*last bullet*):**

- 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. ***Any such scheme needs to be implemented at zero cost to residents.***

##### **Amend para 3b.7 to:**

###### **3b.7 Aspirations (*first bullet*):**

- 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 could incorporate both pedestrian and cycle access to HS2 station so needs to be 50 meters wide;**
  - Along the northern boundary of the location south of Stapleford. **This could comprise a narrow, graded tree and shrub roadside corridor to improve screening of the Innovation Village from the A52;**
  - Along the Erewash Canal **and Erewash River (between Toton Washlands and Stapleford)** to the west of the location (incorporating flood mitigation on the low lying Sidings part of the site);
  - Along the north/south corridor.....

Policy number	Page number	Policy text / Para number
<b>17. Place-making, design and amenity</b>	<b>111</b>	<b>17.1 &amp; 17.2</b>

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		<b>X</b>

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	<b>X</b>
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Residents' comments:

*"Good broadband internet connections needed."*

*"Promote more walking/cycle ways (and fewer cars) in new developments"*

1. Policy 17.1 would benefit by explicitly stating that provision of high speed broadband must be treated as a core utility in all new developments
2. Policy 17.2 would also be strengthened by a statement encouraging good design for walk ways and cycle ways to and through the site is included in the design and access statement

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

**Amend Policies 17.1 & 17.2 to:**

17.1 For all new development, permission will be granted for development which, where relevant:

...)

m) Enables convenient use by people with limited mobility, ***pedestrians & cyclists***; and

n) Incorporates ecologically sensitive design, ***including high speed broadband services***, with a high standard of planting and features for biodiversity; and

...)

17.2 Applicants for housing developments of 10 dwellings or more will be required to submit a design and access statement which includes an assessment of: ***a)*** the proposals against each of the 'Building for Life' criteria (see Appendix 5) ***and b) how the development promotes and encourages walking and cycling through the development.***

Policy number	Page number	Policy text / Para number
<b>23. Proposals affecting designated and non-designated heritage assets</b>	<b>125</b>	<b>Para 23.1, 23.2, &amp; 23.5</b>

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		<b>X</b>

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	<b>X</b>
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Resident's comment:

*"Do not destroy NSFF building at Chilwell end of site. War memorial must be protected and given plenty of space. It means a lot to long term residents like me. 73yrs."*

1. Chetwynd Barracks is due to be sold and redeveloped during the period of this Plan. The site has several valuable heritage assets – especially the memorial and associated garden area - to those who lost their lives during WW1, the shell factory explosion.

There are also other significant buildings – a WW1 Nurses Infirmary and the Officers Mess (part) - and there may be others. We need to ensure these assets are: a) formally identified and registered and; b) protected from any applications to develop the site in advance of any registration.

It is not clear who can apply to register these assets – does it need to be the site owner (MoD) or can the Forum apply?

2. There is a strong case to support the creation of a new Conservation Area within the Barracks site covering these buildings, memorial & gardens. The Forum will look to make such an application at the earliest possible time.

#### Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

##### **Amend para 23.1 to:**

23.1 This policy applies to all heritage assets, including Listed Buildings, Conservation Areas, Scheduled Monuments ***and immediate associated areas (such as green spaces / gardens etc.)*** and non-designated assets of all kinds.

##### **Amend para 23.2 to:**

23.2 Heritage Statements should accompany all applications relating to heritage assets. ***Such a statement will be expected from an application to develop Chetwynd Barracks that will cover those heritage assets located on the site but which may not yet have been formally registered. On-site investigations of heritage assets (such as Hill Farm, on the Barracks), prior to any development starting, should be incorporated into statements. All statements These*** should clearly illustrate the nature of the proposals and their effect on the asset. They should refer to relevant sources of local information including [Conservation Area Appraisals](#), the 'Heritage Gateway', relevant literature and paintings, and the Heritage at Risk Register. Attention should be paid to the Borough's notable industrial heritage. Applications which are not directly related to heritage assets but could impact visually on their setting should include a proportionate Heritage Statement.

##### **Amend para 23.5 to:**

23.5 The Council will aim to produce Appraisals and Management Plans for all its Conservation Areas and will consider the merits of amendments to Conservation Area boundaries. It will also consider the production of a Local List of non-designated assets, criteria for their identification and/or an associated SPD. The Council will look to work pro-actively with established Civic Societies ***and Neighbourhood Forums*** to aid understanding of the local historic environment.

Policy number	Page number	Policy text / Para number
<b>25. Culture, Tourism and Sport</b>	<b>152</b>	<b>Policy 1, 2 &amp; para 25.1</b>

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		<b>X</b>

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	<b>X</b>
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Resident's comment:

*"Provide astro turf facilities for all-year football"*

1. There is a lack of all-weather artificial football pitches throughout the Borough but especially in the south. The Forum has opened discussions with the Notts FA to see how we might work together to develop pitches in the south of the Borough. It will help give a steer to developers if the Local Plan specifically referenced the need for more artificial pitches as well as turf pitches.
2. Chetwynd Barracks has a significant history and it should be recognised and used to enhance the tourism 'offering' in the Borough. By making specific reference to the site in this policy It will help to protect these heritage assets from future development.

#### Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

##### **Amend Policies 1 & 2 to:**

Development proposals will be encouraged that;

1. Make specific provision for sports pitches, ***including artificial, all-weather '3G' pitches***, that are suitable for a wide age range of users, in particular children's sport.
2. Enhance the tourism offer in association with DH Lawrence, ***the legacy of Chetwynd Barracks (especially relating to the WWI shell factory and associated memorial)***, or the industrial/ pharmaceutical heritage of the Borough.

##### **Amend para 25.1 to:**

**25.1** The adopted [Playing Pitch Strategy](#) identifies a deficiency in accessible and secured floodlit football turf ***and artificial, all-weather '3G'*** pitches to the Football Association accreditation standard within the Borough (mainly in the south)

Policy number	Page number	Policy text / Para number
<b>26. Travel Plans</b>	<b>153</b>	<b>Para 26.1</b>

### Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		<b>X</b>

### Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	<b>X</b>
It is not positively prepared	
It is not consistent with national policy	

### Your Comments:

#### Residents' comments:

*"Traffic congestion now is bad. Stapleford lane is so congested could a relief road be put across the depot or around the back of it to ease the congestion on Stapleford Lane please"*

*"New feed Road into Depot from Bardills essential (with Tram/Bus/Cycle links?)"*

*"Promote more walking/cycle ways (and fewer cars) in new developments"*

*"Need regular bus route from Toton to Stapleford into the evenings"*

1. The Forum will promote access to the HS2 Hub Station using walk ways, cycle ways and additional bus routes.  
We would like to see a new, specific 'Justification' paragraph that states all Travel Plans must include a section on walk ways, cycle ways & improved public transport (better bus routes; both frequency and extending services into the evenings)
2. Use section 106 money to improve pavements and cycle ways in local vicinity of developments. For instance, consider creating one-way streets in existing Toton streets bordering the HS2 station such as: Woodstock Road, Epsom Road etc. to allow space to create wider pavements & new cycle ways

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

***Create new Justification para 26.2 to:***

***26.2 We expect Travel Plans to include specific sections detailing how developments will encourage more walking, cycling and public transport (bus routes both frequency and operating times) to / from and through the sites.***

Policy number	Page number	Policy text / Para number
<b>27. Local Green Space</b>	<b>155</b>	<b>Para 27.5</b>

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		<b>X</b>

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	<b>X</b>
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Residents' comments:

*"Keep Hobgoblin wood"*

*"Keep trees on the west side of Barracks - from the quarry upwards"*

1. The Forum intends to submit an application to designate Local Green Space during the development of its Neighbourhood Plan. It will be helpful for the Local Plan to acknowledge this intention so that developers are aware of the need to consult with the community & ensure they include a provision for Green Space in their plans.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

***Amend para 27.5 to:***

27.5 Further areas of Local Green Space may be designated through forthcoming Neighbourhood Plans. ***We expect to receive an application to designate significant stretches of green infrastructure as Local Green Space within the Toton Strategic Growth Area and Chetwynd Barracks development sites.***

Policy number	Page number	Policy text / Para number
<b>28. Green Infrastructure Assets</b>	<b>157</b>	<b>Policy 1.b &amp; para 28.2</b>

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		<b>X</b>

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	<b>X</b>
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

## Residents' comments:

*"Provide astro turf facilities for all-year football"*

*"Re-route Erewash Country trail & public footpath down the eastern edge of the Barracks site"*

*"Size of the depth of the "green corridor" to the south of the boundary and definitive information as to whether this corridor is STRICTLY for wildlife or inclusive of pedestrian access? Further, some categorical assurance as to who will be responsible for the ongoing maintenance of hedges and vegetation?"*

1. Playing Pitches need to specifically include the growing trend for artificial, all-weather '3G' pitches
2. We would like to see new footpaths & cycle ways creating in green corridors inc. a re-routing of the Erewash Valley trail through Chetwynd Barracks.
3. We believe green corridors need to be of a decent, specified width to be consider viable. Otherwise developers will seek to minimise the widths of these corridors for their own purposes. The Notts WT has done research for the Forum on what is considered viable widths of green corridors. In summary:
  - *"corridors should be preserved, enhanced and provided, [...], as they permit certain species to thrive where they otherwise would not. Corridors should be as wide and continuous as possible"* (Dawson, 1994):
  - 50m buffers [are] recommended for developments in the Local Plans of both Wakefield & Darlington Councils to protect local wildlife sites and / or river corridors etc.
  - A 50m width allows corridors to function as a 'multi-purpose network', as defined in NECR 180, so that it includes attributes that are valuable to people, i.e. biodiversity alongside amenity, footpaths, cycle ways, sustainable drainage, microclimate improvement, heritage etc.
  - Quadrat Scotland 2002 (Appendix 1). For connectedness, to be defined as 'high' (on scale high, medium, low), the corridor needs to be at least 50m wide for more than 50% of the corridor

References

Dawson, D. 1994. Are Habitat Corridors Conduits for Animals and Plants in a Fragmented Landscape? A Review of the Scientific Evidence. [English Nature Research Reports](#)

Wakefield Consultation on spatial strategy: [Wakefield Council Spatial Policy Areas](#)

Darlington consultation on draft housing allocations: [Darlington Council Housing Allocations report](#)

[Natural England Commissioned Report](#) NECR180 (2015) Econets, landscape & people: Integrating .....

Quadrat Scotland (2002) The network of wildlife corridors and stepping stones of importance to the biodiversity of East Dunbartonshire. [Scottish Natural Heritage Commissioned Report](#)

#### Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

##### ***Amend Policy 1b) to:***

1. Development proposals which are likely to lead to increased use of any of the Green Infrastructure Assets listed below, as shown on the Policies Map, will be required to take reasonable opportunities to enhance the Green Infrastructure Asset(s). These Green Infrastructure Assets are:
  - a) Green Infrastructure Corridors (not shown on the Policies Map);
  - b) Playing Pitches, ***including artificial, all-weather '3G' Pitches;***
  - c) Informal.....

##### ***Amend para 28.2 to:***

28.2 The corridors that are [.....]. The details of these opportunities for enhancement will depend on the characteristics of the corridors concerned. ***The Council believes corridors must be 50 metres wide to be considered beneficial and viable for wildlife.*** The corridors are detailed in section 6 of the GIS and are shown diagrammatically on the map on page 160 in this Plan. The corridors do not have fixed boundaries and the map on page 160 should not therefore be interpreted rigidly.

##### ***Amend para 28.5 to:***

28.5 A potential continuation of the Nottingham Canal towpath [.....] should proposals for this emerge in the future. ***With the development of Chetwynd Barracks, the Council intends to exploit a new green corridor planned for the eastern side of the Barracks. It will re-route the Erewash Valley Trail down a new public footpath/cycleway through the corridor, and from there continue the Trail to the Attenborough Nature Centre.*** The Nature Reserves that are referred to in part 1f of the policy include Local Nature Reserves designated by the Council and Nature Reserves managed by Nottinghamshire County Council and Nottinghamshire Wildlife Trust.

Policy number	Page number	Policy text / Para number
<b>32. Developer Contributions</b>	<b>171</b>	<b>Para 32.1</b>

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		<b>X</b>

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	<b>X</b>
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Residents' comments:

*"Schools 3-18? What's the impact on existing LEA Primary schools?"*

*"If HS2 doesn't happen what funding is available to George Spencer to cover influx of children?"*

1. Paragraph 32.1 would benefit by explicitly stating that Section 106 contributions are needed to increase capacity at all levels of education. Developers must acknowledge their obligations to increase provision at secondary schools as well as primary schools. This point is well made in the Infrastructure Delivery Plan (sections 4.51, 4.52, 4.55, pages 19, 20)
2. A new paragraph would be useful to explicitly state that all Section 106 contributions will be directed in the first instance to the Borough wards/town & parish councils affected by developments before other areas in the Borough are considered. This is because it cannot be right that other areas of the Borough benefit from developers' contributions before residents in the immediate vicinity are awarded suitable recompense for the changes to their environment.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

**Amend para 32.1 to:**

**32.1** This policy strikes the appropriate balance between ensuring the infrastructure requirements to make the development acceptable in planning terms are met, at the same time as not compromising the viability of developments. ***It is acknowledged that financial contributions are needed to increase provision of education capacity at secondary schools in key areas of the Borough***

**New Justification para 32.2 to:**

**32.2** ***All Section 106 contributions will be directed in the first instance to the Borough wards/town & parish councils affected by developments before other areas in the Borough are considered***

Question 5. Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	
<b>Yes, I wish to participate at the public examination</b>	<b>Yes</b>
No, I do not wish to participate at the public examination	

If you wish to participate at the public examination, please outline why you consider this to be necessary

- 1. The CTTC Forum would like the opportunity to explain in more detail the rationale for our suggested modifications to the Examiner. A specific concern relates to paragraph 28.2 and the need to explicitly commit to a specified width of green corridors necessary to assure viability of wildlife. However, we want the opportunity to explain our suggestions across all policies as appropriate.**