The Council's approach to Green Belt release and Green Belt boundary review is inconsistent in the Core Strategy. Furthermore, it will not deliver the homes and jobs needed in the area (paragraph 156 of NPPF) nor allocates sites to promote development (paragraph 157 of NPPF).

It is acknowledged that land needs to be released from the Green Belt adjoining the Nottingham Principal Urban Area (PUA) to meet objectively assessed housing and employment needs.

In Broxtowe Borough the only site proposed to be released from the Green Belt through the Core Strategy document is Field Farm. This is defined in Policy 2 as a strategic allocation. Its detailed boundary is shown on pages 133 and 134 of CD/REG/101.

Officers advise that a decision to release Field Farm from Green Belt was predicated on the Planning Inspector’s report into the Broxtowe Local Plan (2003), the need for a five year housing supply and their view that Field Farm was the least sensitive of all the identified strategic sites in the Green Belt.

The Local Plan Inspector’s Report is still relied on by the Council as forming the basis for Field Farm's release despite this report being 8 years old and the publication of the National Planning Policy Framework with places specific emphasis on sustainable development.

In the knowledge that there is a need for a large amount of housing adjacent to the PUA in Broxtowe, there is no objection per se to Field Farm being released from the Green Belt. However the Core Strategy should provide for the release of sites in addition to Field Farm from the Green Belt. A decision to only release Field Farm from the Green Belt would conflict with the fact that more sites to accommodate a further 1,000 houses adjacent to the PUA in the Green Belt are required.

The land identified at Toton (CD/REG/10) is designated as a “strategic location” with indicative shading on the plan showing a general area likely for release from the Green Belt. The Council indicates that it will not be formally released from the Green Belt until the subject of a boundary specific definition has been considered through the Site Allocation DPD and boundaries defined.

The NPPF at paragraph 153 however advises local planning authorities that additional development plan documents should only be used where clearly justified. Procrastination over the adoption of the Site Allocations DPD would delay strategic development on land identified by the Council for growth, and there is no guarantee that such development plan documents will come to fruition.

There is no justification for defining the detailed boundary of the Toton site (and the Green Belt) in a future development plan document. Such boundaries are capable of
being addressed in the Core Strategy, and the Toton site is able to be released from the Green Belt now. The Site Allocation DPD will not be adopted, at the very earliest (and if the council adheres to its timetable) until "Winter" 2014/15. The delay is unnecessary.

- Failing to release more sites from the Green Belt in the Core Strategy would create conflict between development plan documents until the Site Allocations DPD was adopted. Should it be adopted the Core Strategy would contain policies endorsing the release of 73 ha of land at the Toton growth location from the Green Belt whilst the Broxtowe Local Plan 2004 would still designate the land in the Green Belt. (Please see attached Legal Note)

- By identifying Toton as a Strategic Location for Growth the Council accepts that the site represents a major opportunity for a mixed use development that will generate significant economic benefits. Such development would also accommodate a significant quantum of the housing which has to be found using what is currently Green Belt land adjacent the PUA. The site should therefore be released from the Green Belt now so that these benefits can be accelerated, and so that much needed housing and jobs can be provided.

- The Council clearly had a specific site in mind when determining the boundaries of the Strategic Location for Growth at Toton (and in accepting that such land should be removed from the Green Belt). It could not have pursued the site, as a strategic release from the Green Belt without a concept of its physical extent.

- Appendix 4 of CD/REG/10 under Point 12 – Employment makes reference to a “larger area than previous proposals offers opportunities for a mixed use development providing employment.” The “previous proposals” relates to land to the west of Toton Lane that is the subject of the current mixed use planning application (2012/00585/OUT); this site covers 41 ha.

- At Appendix 3 of CD/REG/10 reference is made to a 73 ha site and the location map shows its position. Hence the size has been defined. Physical defensible boundaries define the extent in all directions.

- Against this background it is inconceivable that the site has not been identified in much greater detail than is shown indicatively on the Strategic Location for Growth Plan on page 73 of CD/REG/02.

- The Strategic Location for Growth at Toton has well defined boundaries:

  1. West of Toton/Lane/Stapleford Lane – this is contained by existing residential properties to the south, the A52 to the north, Toton Sidings to the west and Toton Lane/NET park and ride to the east.

  2. East of Toton/Lane/Stapleford Lane this is contained by Toton Lane to the west, existing residential properties in Toton to the south/east, the NET park and ride and tram line to the north/east.

  3. Hence the Strategic Location for Growth is contained by the A52, Toton Sidings, the NET Park & ride and tram route and existing residential curtilages.

- A 73 hectare site can be easily identified (indeed has already been) using the parameters set out by the Council in CD/REG/10 and the Core Strategy and would not
represent a major change to the Core Strategy proposals maps. Plan A attached to these Representations shows the 73 ha site that reflects the Council’s Strategic Location for Growth Plan in the submitted Core Strategy. For comparison purposes the Council’s Plan (Page 73 CD/REG/02) is also attached to these representations.

- Not to release the Strategic Location for Growth at Toton from the Green Belt as part of the Core Strategy will only further delay developments. The proposed development of the site is not dependent on HS2 being implemented and the site can accommodate a range of uses.

- Plan B attached shows an indicative scheme for the Strategic Location for Growth site at Toton.

- Land to the west of Toton Lane, which covers 41 ha of the 73 ha identified site, is the subject of a current planning application 2012/00585 for mixed use development – 650 dwellings, 80 bed care facility and 3,000 sq m of B1(a) floor space and a wide range of community and service facilities. The most recently submitted site layout is attached.

- There will be opportunities for further development on the remainder of the Strategic Location for Growth and on Toton Sidings and the HS2 Station hub.

- Part of the Strategic Location for Growth to the East of Toton Lane/ Stapleford Lane has been the subject of 3 Screening Opinions submitted by Peveril Securities/UK PP (Toton) Limited as a prelude to seeking planning permission. Those Screening Opinions related to:

  I. A maximum of 225 dwellings
  II. A maximum of 17,000 sq metres of B1(a
  III. A maximum if 5,000 sq m of B1(a) ad 175 dwellings

The need for release of the SLG now is further supported by the Council’s current and projected 5 year housing supply position in Broxtowe. Over the first 2 years of the plan there have been 253 completions (2011-13). Hence a shortfall of 527 dwellings (760 - 253).

To recover this over a 5 year period (Sedgefield) this equates to 105 units per year. This requires an annual target over the next 5 years of 485 units; a total of 2,425 houses. Hence the position is:

| Housing need 485/year including 5% buffer | 2,425 |
| Council's claimed supply | 1624 |
| Years of Supply | 3.34 |

The last 4 years have witnessed persistent under delivery of housing in the Borough. Accordingly it is appropriate to include a 20% buffer. This raises the annual target to 539 dwellings.

| Housing need 539/year including 20% buffer | 2,695 |
| Council's claimed supply | 1624 |
| Years of Supply | 3.01 |
Hence there is a need to increase delivery now. The Council has used the “Liverpool” method for calculating its 5 year housing supply rather than the “Sedgefield” method. The latest government guidance (National Planning Practice Guidance) advises that under supply should be dealt with in the first 5 years where possible. The Toton site is ready to contribute both market and affordable housing. It is common ground with the Council that work could start on site within 12 months of issue of outline planning permission.

**Suggested Changes**

In the light of the above it is respectfully requested that the Core Strategy documents/plans should be amended as follows:

1. Policy 2 at sub-section 3a(iii) should have the same notation and footnote as its provided for land at Field Farm under point 2.3a (ii).

2. Policy 2.3a iii) text be amended to:

   “A strategic location for growth in the vicinity of the proposed HS2 station at Toton, in Broxtowe”.

3. Paragraph 3.3.3a should be amended to read as follows:

   “In Broxtowe Borough the Green Belt is amended to allow a mixed use development in the allocated Strategic Location for Growth including access arrangements, a NET extension and mixed use economic and housing development and to enable for the long term construction of the proposed HS2 station at Toton. This site is identified on Plan A”.

   A copy of Plan A is attached to these representations.

4. The Plan of the Strategic Location for Growth on Page 73 of CD/REG/03 should be replaced with Plan A and Plan B.

   A copy of Plan A and Plan B is attached to these representations.

5. Appendix A of CD/Reg/03 should be amended. The site summary should indicate the following:

<table>
<thead>
<tr>
<th>ACS Designation</th>
<th>Strategic Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timescale</td>
<td>0-10 years</td>
</tr>
<tr>
<td>Site area</td>
<td>73 hectares</td>
</tr>
<tr>
<td>Housing units</td>
<td>Approximately 800 houses</td>
</tr>
<tr>
<td>Employment uses</td>
<td>B1, education, retail</td>
</tr>
<tr>
<td>Other uses</td>
<td>Open space, community facilities including education and limited local retail provision</td>
</tr>
<tr>
<td>Ownership/developer</td>
<td>Planning application submitted in land to the west of Toton Lane. Willing owners positively engaged to meet the needs of HS2. Screening opinion submitted on land to the west of Toton Lane.</td>
</tr>
</tbody>
</table>
6. Appendix A – Strategic Site Schedules and Plans - Strategic Location for Growth at Toton in CD/REG/03 should be inserted in CD/REG01.

7. The Key Diagram should be amended such that the Strategic Location for Growth is denoted as a Strategic Allocation as is the case with Field Farm, North of Papplewick and Top Wighay Farm.