

AWSWORTH PARISH COUNCIL

Greater Nottingham Strategic Plan – Publication Draft Consultation (March 2025) – Additional Comments

With reference to **Policy 3 Housing Target proposed at Policy 3(1)** to be increased for Broxtowe from 8,250 to 8,950 dwellings.

And with reference at **Policy 3(4) to 1** 'The remainder of homes will be provided elsewhere, including in or adjoining the Key Settlements: In Broxtowe, through existing commitments at: a) Awsworth'.

Also, with reference to **Justification paragraph 3.3.16** in relation to Broxtowe which states that 'Awsworth, Eastwood and Kimberley are identified as Key Settlements. However, the delivery of new homes at these Key Settlements over the Plan period will be achieved only through existing commitments comprising a combination of sites which have already been allocated by the Broxtowe Part 2 Local Plan (2019) and sites within the settlements which already have planning permission, or sites which come forward as infill / windfall sites. It is not proposed that there will be any further Green Belt release for residential development. Applications for housing development within these settlements will continue to be considered on their merits, subject to relevant policies, and there will be no general presumption that such applications should be refused.

Awsworth Parish Council wish to point out that Awsworth (including through the Awsworth Neighbourhood Plan (adopted July 2021) has already willingly supported and met its required housing provision of 350 new homes in the period 2015-2030. This includes a major new housing development of 250 dwellings currently under construction to the west of Awsworth (Bennerley View by Avant Homes).

This new housing provision of 350 is a significant increase above the approximately 1,016 existing dwellings which comprise the built area of the defined Key Settlement. We are concerned that this will place undue pressures on the already stretched local facilities in our parish area.

As regards the proposed increase across Broxtowe Borough of some 700 additional dwellings, (notwithstanding what is stated at paragraph 3.3.16) Awsworth Parish Council is therefore concerned that further housing pressure should not be unreasonably placed on the village and parish.

In addition, we would point to the existing planning permission at Gin Close Way (Langridge Homes) at the northern edge of the village, which remains undeveloped notwithstanding various amended schemes over more than 40 years to provide approximately 60 dwellings. The Parish Council believes that this site should be developed before any further greenfield (Green Belt) sites are considered for release.

Moreover, the Parish Council would point to the significantly changed situation with the newly proposed Strategic Logistics and Distribution development at Bennerley.

‘The Delivery Strategy – Section D - Policy 22: Strategic Allocation Former Bennerley Coal Disposal Point (Broxtowe)’ refers.

This comprises the Former Bennerley Coal Disposal Point Site and additional greenfield (Green Belt) land located immediately north of Awsworth Key Settlement, all within Awsworth Parish, all owned and promoted by Harworth Group PLC. The 61 Hectares proposed for this economic development would represent a further significant change for Awsworth village and parish.

The Parish Council is concerned that this proposed strategic economic development north of the village, taken together with the current major housing development west of the village, would pose significant pressures on Awsworth’s character, infrastructure, biodiversity and residents. These developments require careful planning and implementation and should ensure the best outcomes for the local area and residents.

A crucial part of this will be the need to ensure the realisation of a new Country Park at Bennerley, which our adopted Neighbourhood Plan supports.

Policy 22(1) acknowledges (‘...to be delivered in conjunction with a Country Park for the benefit of the local community’).

Similarly, **Policy 22(2)B4** confirms (‘The creation of a Country Park for the benefit of the local community. This must be provided in conjunction with the logistics development’).

END

PUBLICATION DRAFT – GREATER NOTTINGHAM STRATEGIC PLAN
AWSWORTH PARISH COUNCIL RESPONSE – SUPPORTING DOCUMENT

BACKGROUND

Broxtowe Borough, Gedling Borough, Nottingham City and Rushcliffe Borough Councils are preparing the Greater Nottingham Strategic Plan, which sets out policies to secure sustainable growth up to 2041.

The first Preferred Approach stage (consulted on in January and February 2023), focused on the overall vision and objectives and the amount of new homes and jobs and where they should be located. The second Preferred Approach stage (consulted on between September and November 2023), focused on the approach to large scale distribution sites. Awsworth Parish Council responded to these earlier consultations.

This version of the Strategic Plan includes all matters previously consulted on, but includes all matters covered by a full Local Plan, including for the whole of Broxtowe.

The Strategic Plan sets out how Broxtowe Borough Council and the other Councils intend to address issues such as the number and location of new homes required for a growing population, providing new jobs and infrastructure, tackling climate change, and protecting and enhancing the area's heritage, open spaces and biodiversity, in a way that minimises the impact on the environment.

Most of the proposals included in the Greater Nottingham Strategic Plan have been carried forward from the Aligned Core Strategy, although the Greater Nottingham Strategic Plan **allocates new development sites in Broxtowe Borough, including one of particular interest to Awsworth Parish Council: namely;**

- **Land at the Former Bennerley Coal Disposal Point, for large scale logistics development.**

In accordance Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Awsworth Parish Council's representations on the publication draft of the Strategic Plan are set out below.

AWSWORTH PARISH COUNCIL'S OVERVIEW

Awsworth Parish Council has a legitimate and close interest in the proposals for the Strategic Allocation Site at Bennerley because most of the site is in Awsworth Parish. The proposed site extends to 79 Hectares (covering 25% of the parish), which broadly equates to the area defined as the Awsworth Key Settlement. Development on the scale envisaged would represent the most significant change to our parish in living memory. Clearly, were the development to go ahead, the Parish Council want to ensure that impacts on the parish and wider area are minimised, with appropriate compensatory measures and enhancement provided, and that tangible lasting benefits are delivered for the local community of Awsworth and surrounding area.

Although the Allocation Site is referred to as 'Land at the Former Bennerley Coal Disposal point' this name is both incorrect and misleading. The Allocation Site includes other adjoining land to the northwest (along the River Erewash floodplain) and northeast, west of Shilo Way and Gin Close Way (A6096 Awsworth and Cossall Bypass) and south of the A610 (Eastwood – Langley Mill Bypass).

Local Government Boundary changes in April 2023, meant the area of Awsworth Parish expanded from 148 to 317 Hectares. The former Bennerley Coal Disposal Point site and access road from the A610 are in Awsworth Parish. The eastern part of the CDP, together with agricultural land west of the Shilo Way, is located towards the southern part of the Strategic Allocation Site and comprises part (approx. 60%) of the 61 Hectares proposed for logistics development. Land previously forming part of Greasley Parish but now in Awsworth Parish, west of A6096 Gin Close Way and south of the A610, forms the northern part of the Allocation Site and is also within the 61 Hectares proposed for logistics development (approx. 40%).

APC broadly supports the proposals for Bennerley, especially the new Country Park, which forms a key ambition of the Awsworth Neighbourhood Plan (adopted 21 July 2021). We acknowledge that realising our aspiration for a Country Park on land north of Bennerley Viaduct is likely to require significant compromise. The proposals would also help restore an extensive area of long-derelict land to more beneficial use.

Nonetheless, our support is subject to sufficient and effective safeguards being put in place and enforced. These relate to our concerns about likely adverse impacts on a range of matters: the local environment (including landscape character, habitat and biodiversity, Green and Blue Infrastructure); heritage assets (particularly the Grade II* listed Bennerley Viaduct); access (including road, rail, walking, cycling, horse-riding); traffic movements and conflicts (including HGVs, cars, trains, buses, pedestrians, cyclists, horse-riders); parking (including in relation to the logistics development, visitor attractions at Bennerley Viaduct and the new Country Park).

We are concerned that the local community (through the Parish Council and where possible involving residents) can contribute and influence the shape of the proposed developments. We wish to work closely with promoters Harworth, Friends of Bennerley Viaduct, Broxtowe Borough Council, Nottinghamshire County Council and other organisations with vested interests in the area. We consider it crucial to ensure that the proposed developments are innovative, high-quality and sustainable.

AWSWORTH PARISH COUNCIL DETAILED COMMENTS

VISION OF GREATER NOTTINGHAM IN 2041:

“By 2041 Greater Nottingham will lead sustainable development in the region and be an integrated, connected and fully functioning City region. The area will make the most of its economic, cultural, historic and natural assets and be at the forefront of tackling and adapting to the impacts and challenges of climate change.

The area’s carbon footprint will be minimised, the unique abundant natural resources will be capitalised on and blue and green infrastructure, landscapes, heritage and biodiversity will be protected, enhanced and increased.

Recognising the climate emergency, the councils will seek to be carbon neutral before the Government’s target of 2050”.

APC is concerned to ensure that all the aspirations contained in the Vision of Greater Nottingham are realised across the whole of our newly enlarged Parish area, including that natural resources will be capitalised on, but particularly that blue and green infrastructure, landscapes, heritage and biodiversity will be protected, enhanced and increased. This is in line with the adopted Awsworth Neighbourhood Plan, which sets out what the local community expects for their Parish (notwithstanding that an additional 171 Hectares of land is not covered by the Plan).

THE SPATIAL STRATEGY

“The broad principles behind the plan are:

- a) Ensuring that development maximises opportunities to enhance the Blue and Green Infrastructure network and incorporates Blue and Green Infrastructure into new development;
- b) Promoting urban living through prioritising sites for development firstly within the main built up area of Nottingham, and to a lesser extent adjoining it;
- c) Ensuring that new development adjoining the built up area of Hucknall, or in or adjoining Key Settlements, is of a scale and character that supports these as sustainable locations for growth;
- d) Creating sustainable communities that have local community services and facilities, are attractive places to live and visit and which enhance the quality of life for residents;
- e) Ensuring that walking, cycling and public transport infrastructure connects new development to local community services, retail, and employment; and
- f) Maximising the economic development potential of key sites including the former Ratcliffe on Soar power station, former Bennerley Coal Disposal Point, Toton Strategic Location for Growth and the wider Broad Marsh area”.

APC generally welcome and support the 6 broad principles behind the plan.

APC fully support criterion (a) “Ensuring that development maximises opportunities to enhance the Blue and Green Infrastructure network and incorporates Blue and Green Infrastructure into new development”. We believe that this is essential to ensure sustainable development, especially where major development is being promoted, such as on Land at the Former Bennerley Coal Disposal point (and on adjoining land), for large scale logistics development. Several valuable Green Corridors pass through the allocation site, and these must be protected and where possible enhanced. ANP Policy GI 1: ‘Green and Blue Infrastructure Network’ refers.

APC support Criterion (b) “Promoting urban living through prioritising sites for development firstly within the main built up area of Nottingham, and to a lesser extent adjoining it”. We believe that the focus should be on the main built-up areas, including Nottingham City and the larger Towns, but that emphasis should be placed on re-using derelict and under-used land wherever possible, although not at the expense of biodiversity. Similarly, we place great value on the designated Green Belt areas in Awsworth Parish, particularly where these prevent built areas merging with each other, which is highly relevant in the area around Bennerley west of Awsworth.

APC fully support criterion (c) “Ensuring that new development.....in or adjoining Key Settlements, is of a scale and character that supports these as sustainable locations for growth”. While we welcome new development, (as evidenced through our Neighbourhood Plan, particularly Policy H 1: ‘New Homes on ‘Land West of Awsworth (inside the by-pass)’, approximately 350 new houses [including a major development of 200 new homes, now 250 as a result of local boundary changes] we remain concerned that development should be adequately supported by associated infrastructure, including local facilities such as education, shops and public transport provision. Our experience to date has not provided what we believe is needed to support our growing community (2,200 in 2011 likely to increase to almost 3,000 by 2030).

APC fully support Criterion (d) “Creating sustainable communities that have local community services and facilities, are attractive places to live and visit and which enhance the quality of life for residents”. See previous comments.

APC fully support Criterion (e) “Ensuring that walking, cycling and public transport infrastructure connects new development to local community services, retail, and employment”. This forms an important element of our Neighbourhood Plan (Policy TT 3: ‘Sustainable Transport’ refers), the importance of which has been enhanced by the recent opening and continuing development of Bennerley Viaduct (the majority of which is in Awsworth Parish).

APC generally support Criterion (f) “Maximising the economic development potential of key sites including.....[in the context of Awsworth Parish] the former Bennerley Coal Disposal Point”. We have some concerns about the strategic site and how it is defined and described. We have previously commented that the Strategic Allocation Site comprises more than the former Bennerley Coal Disposal Point. This is also covered below.

The ‘Red (dashed) Outline’ site identified extends to approximately 79 Hectares, including 61 Hectares (77% of total) proposed to be allocated for large scale logistics development (intended for a minimum of 124,500 square metres floorspace / approx. 1.34 million square feet) which includes a Rail Freight Terminal. A minimum unit size of 9,000 m² will be applied. This broadly equates to buildings around 100,000 sq. ft. or larger, the logistics industry’s recognised definition of a large-scale distribution centre.

This suggests that the remainder of the site (18 Hectares) would provide the larger part of a new Country Park. While some of the Coal Disposal Point would be used for the Country Park, other adjacent agricultural land to the north and south would also be used for this purpose. While the land to the north is included within the allocation site Red Outline that to the south of the viaduct is not currently shown.

Although the whole of the proposed 79 Hectares of land for the strategic site allocation is referred to as ‘the Former Bennerley Coal Disposal Point’, it should be noted that, the Coal Disposal Point comprises only part of the wider site. Paragraph 3.22.1 acknowledges ‘Part of the site was previously used as a coal disposal point’.

APC estimate that the Coal Disposal Point site extends to about 24 Hectares, including the access road from the A610. The eastern part of the Coal Disposal Point is proposed for employment use while the western part is proposed as the critical central portion of the Country Park, close to the north side of the Grade II* listed structure at Bennerley Viaduct. The wider employment site includes agricultural land adjoining to the northeast extending as far as the A610, which now also marks the northern boundary of Awsworth Parish. This agricultural land accounts for about two-thirds of the proposed employment area.

As regards **Policies Map Changes for Broxtowe Borough Council (Policies Map Changes September 2024)** this document indicates geographically the Green Belt changes and the site boundaries of the proposed strategic allocation at Bennerley. Regarding the statement that ‘Bennerley has been removed from the Green Belt’, APC note and support that in relation to the ‘Red Outline’ site at Bennerley, the Green Belt proposed to be removed (shown hatched purple) excludes the western part of the Coal Disposal Point and land further north along the River Erewash floodplain to the north of Gilt Brook. These areas are identified for the Country Park. Other land south of Bennerley Viaduct, also within the River Erewash floodplain and outside the ‘Red Outline’, would remain in Green Belt as the southern part of the Country Park.

APC also note that while the land proposed to be removed from Green Belt mostly lies to the west of the A6096 Shilo Way (coinciding with the strategic allocation site), a strip of land lying east of the A6096 is also shown as proposed to be excluded from Green Belt, between Park Hill and Gin Close Way. This comprises APC’s Shilo Recreation Ground and adjoining Pocket Park to the south, and the area of The Meadows / Barlow’s Cottages Lane to the north. **APC have concerns about the latter area being excluded** and coming under pressure for new housing development, especially in relation to the historical connection with

Glasshouse Yard and the designated Local Wildlife Site (Glasshouse Yard Grassland).

The Bennerley Strategic Allocation (Broxtowe): Location Plan and Site Detail (Insert Plan), incorrectly in our view, show the site as including the western part of the Coal Disposal Point and land along the Erewash floodplain north of Gilt Brook. These areas are intended to form part of the new Country Park and remain in the Green Belt. In particular, the western part of the Coal Disposal Point land serves a valuable Green Belt function in maintaining a sufficiently wide strategic gap between the built areas of Ilkeston (Cotmanhay) in the west and Awsworth to the east.

Greater Nottingham Strategic Plan Publication Draft 2024 Policy 22 (p178-179)

Policy 22: Strategic Allocation Former Bennerley Coal Disposal Point (Broxtowe)

- 1. The area, as shown on the adopted policies map, is identified as a strategic site for rail-connected logistics development, incorporating a rail freight terminal, to be delivered in conjunction with a Country Park for the benefit of the local community.**

APC have serious reservations about the requirement for the strategic site to be rail-connected and to incorporate a rail freight terminal. As set out below in relation to para 3.22.4, APC have serious concerns about the practicality and implications of the suggested rail access from the Erewash Valley railway line. APC believe it is critical that any logistics development of the scale proposed and, in this location, should be required to be delivered in conjunction with a Country Park for the benefit of the local community. Although 'the local community' is not defined, the village of Awsworth is relatively close to the east, as is Cotmanhay (Ilkeston) to the west, and to a lesser extent Giltbrook to the north. We estimate that some 100,000 people live within 2-3 miles of the proposed Country Park. Moreover, the close physical connection between the proposed Country Park and Bennerley Viaduct is very likely to benefit both, in terms of their attraction to visitors from the local area and more widely. A new Country Park would clearly complement the current restoration scheme at Bennerley Viaduct and provide synergy for both.

Policy 22: Strategic Allocation Former Bennerley Coal Disposal Point (Broxtowe)

- 2. The development will be subject to the following requirements:**

A. Logistics

1. 61 hectares of logistics development (Class B8 storage and distribution) with a minimum unit size of 9,000 m² secured by condition.
2. Provision of a rail-freight terminal. This will include railway sidings and a facility to allow freight to be transferred to and from freight wagons. This should make use of existing infrastructure where practical and will include a connection to the Erewash Valley Railway Line.

3. A programme with ambitious targets for modal shift to rail including a strategy for implementation.

APC have serious concerns about A2 and A3 in relation to provision of a Rail Freight Terminal and targets for modal shift to rail. We comment elsewhere regarding A1 and 61 Hectares of logistics development.

B. Country Park

4. The creation of a Country Park for the benefit of the local community. This must be provided in conjunction with the logistics development.

5. Provision of an access management plan for the Country Park.

6. Provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

APC fully support B4 and B5 which we believe to be critical in terms of creating and managing a new Country Park. We strongly support providing improvements to the quality and accessibility of remaining Green Belt land.

C. Access

7. Provision of a rail-freight connection from the Erewash Valley Railway Line to enable rail-freight to be loaded and unloaded within the site.

8. Primary site access should be direct to and from the A610 dual carriageway to the north.

9. Improvements to road infrastructure necessary to mitigate adverse traffic impacts.

10. The development should be designed to enable the routing of bus services into the site (including the provision of turning points within the site) to enable employees to travel to the site by public transport.

11. Existing public rights of way should be retained or replaced with public rights of way of enhanced quality, which should include improving accessibility to remaining Green Belt land.

12. New pedestrian and cycle routes should be incorporated both within the site and also to link to the surrounding networks.

13. Implementation of a travel plan.

APC fully support C8 – C13 above. However, we have serious concerns about the practicability and feasibility of C7.

D. Design and Heritage

14. A high standard of design will be required at this site, in particular to ensure that any built or other development is sympathetic to the Grade II* Listed Bennerley Viaduct, existing blue and green infrastructure assets within the local area, landscape character, and the area of the new Country Park.

15. Provision of landscape screening to limit the impact on the surrounding area.

16. Design should be innovative and will need to demonstrate how the development will contribute to the transition towards net-zero development.

APC fully support D14 and D15 in relation to 2 key elements of the adopted Awsworth Neighbourhood Plan. APC consider it important to ensure innovative design for all aspects of the scheme'. Design should also clearly demonstrate how development will contribute towards net-zero.

E. Blue and Green Infrastructure

17. Retention of existing mature trees, hedgerows and grass verges.

18. Retention of blue and green infrastructure in between areas of new development.

APC fully support E17 and E18 in relation to retention of green and blue infrastructure but would also expect enhancement and new provision.

F. Noise and Light Pollution

19. Any new development (including buildings, open storage areas, rail infrastructure, parking and freight transfer areas) should be screened to limit any noise or light pollution, as well as any other disturbance to local residents and the wider area.

20. Provision of a noise and light pollution management plan which includes an appropriate mitigation strategy.

APC fully support F19 and F20 in terms of limiting and mitigating noise and light pollution as well as other disturbance to local residents, especially where 24 hours working patterns are implemented.

G. Training and Employment

21. Local training and employment opportunities should be provided as part of the construction of the site and during the operational phases of the site.

APC fully support G21 to ensure local training and employment opportunities, including for Awsworth residents.

H. Other Requirements

22. Provision of an on-site sustainable drainage system.

23. Flood attenuation measures to address any issues in relation to flood risk.

24. Biodiversity Net Gain should be provided on site.

25. All development should comply with the Police 'Secured by Design' principles.

26. The playing fields to the north-west of the site and to the south of Shilo Way should not be adversely impacted by the development.

27. Planning permission will not be granted for manufacturing uses which would have an adverse air quality impact upon any European site for nature

conservation including the possible potential Special Protection Area, either alone or in combination with other pollution sources such as traffic.

28. Provision of contributions for local infrastructure, including facilities and services that are required for development to take place or which are needed to mitigate the adverse impact of development at the site or neighbourhood level, will be secured through Planning Obligations and / or a Community Infrastructure Levy.

APC fully support H22 to H28 as regards the range of other requirements which the proposed development should satisfy, in order to minimise and mitigate adverse impacts and ensure long-term sustainable development.

As regards Policy 22 (2) which sets out requirements, some of these aspects are also covered in our comments on the accompanying Justification Text.

Justification Text

Page 180 - **Para 3.22.1** - states 'The site covers approximately 79 ha and is located to the north of Awsworth and to the south-west of Giltbrook. It is located adjacent to the Bennerley Viaduct, a Grade II* listed structure. Part of the site was previously used as a coal disposal point. The site is located adjacent to the Erewash Valley railway line with rail access achievable via a disused spur and railway bridge that crosses the River Erewash. Road access is achievable from the A610. **The site contains areas of hardstanding, open fields and existing development**'.

APC note that 'Part of the site was previously used as a coal disposal point'. **APC are unclear what 'existing development' comprises.**

Page 180 - **Para 3.22.2** - states 'The site is located close to centres of populations at Eastwood, **Awsworth** and Ilkeston / Cotmanhay. It is also near to Kimberley / Nuthall and Nottingham. The site is close to areas of high deprivation within Eastwood, Ilkeston / Cotmanhay and also near to areas of deprivation in Nottingham. The development of this site for logistics will bring economic benefits to these areas'.

APC acknowledge that some economic benefit will be felt, potentially including some benefits for Awsworth and its residents. We strongly believe that clear plans should be put in place to ensure that Awsworth and its community enjoy tangible and measurable benefits resulting from these major proposals, including the new Country Park but also in relation to employment opportunities at the logistics development. In this regard we particularly welcome what is proposed at '**G. Training and Employment** - 21. Local training and employment opportunities should be provided as part of the construction of the site and during the operational phases of the site'.

Page 180 - **Para 3.22.3** - states that '61 ha of the site is allocated for logistics development which includes a Rail Freight Terminal. It has been identified that the site can provide a minimum of 124,500 m² of logistics floorspace. A minimum unit size of 9,000 m² will be applied. This broadly equates to buildings around 100,000

sq. ft. or larger, the logistics industry's recognised definition of a large-scale distribution centre'.

APC have concerns about the overall impact of the warehouse sheds required to accommodate the proposed floorspace, which would largely be located north of the Coal Disposal Point towards and alongside the A610 on agricultural land. We estimate that up to 14 units would be required with each potentially the size of 1.5 football pitches. Local boundary changes mean that all these new sheds would be within Awsworth Parish.

Page 180 - **Para 3.22.4** - states that 'The **provision of a rail freight terminal is vital** to enable low carbon transportation of rail freight. It also provides rail access for distribution and logistics within the wider area, including existing strategic distribution sites to the north at M1 junctions 27 and 28. **A programme with ambitious targets for modal shift to rail including a strategy for implementation is required** to reduce the dependency on transporting goods by road'.

While recognising the importance of moving freight by rail wherever possible, APC have serious reservations about the practicality and implications of the suggested rail access from the Erewash Valley railway line. We are of the view that the rail siding is too short to effectively serve the proposed rail-freight terminal. Moreover, the siding would require to be located close along the northern boundary of the Coal Disposal Point, restricting operation to one side only (south). Less than 50% of the siding would be located within the area proposed for 'Rail Freight Terminal & Container Storage'. Train movements would involve reversing in or out of the site, which we understand to be potentially hazardous, risking wagons jumping the track. Also, we consider that the areal extent of the rail-freight terminal appears rather too small to realise an efficient RFT. The area shown for the RFT comes uncomfortably close to the listed Grade II* structure of Bennerley Viaduct. A rail siding would also have a serious adverse impact on the proposed Country Park by severing the Country Park and affecting its use for recreational purposes.

Page 180 - **Para 3.22.5** - states that 'The Country Park, as identified within the Awsworth Neighbourhood Plan, should contain recreational space and support and complement the cycle and walking routes provided by Bennerley Viaduct. The Country Park should provide a high quality environment which will protect and enhance wildlife and biodiversity interest. It should also protect the open setting of Bennerley Viaduct and key views of the structure and should also preserve the openness of the Green Belt and protect the gap between Awsworth and Cotmanhay to the west. It must be provided in conjunction with the delivery of the logistics development and is vital to achieving sustainable development across the site. It also provides the opportunity for biodiversity enhancement as part of Biodiversity Net Gain. The access management plan should contain details of how the Country Park will be linked to existing footpaths and recreational routes, how the site will be accessible for a range of users and measures to prevent inappropriate vehicles such as motorbikes from accessing the site'.

APC strongly support the above in relation to Awsworth Neighbourhood Plan and what it says about the Country Park, Bennerley Viaduct, Green Belt,

recreation and wildlife and biodiversity. There are critical linkages between these various elements which need to be protected and enhanced. The Country Park provides an exciting, once in a lifetime opportunity to provide publicly accessible recreational space and to complement existing cycling and walking routes at Bennerley Viaduct. We strongly agree that the Country Park should provide a high-quality environment to protect and enhance wildlife and biodiversity (Aim BDP 1: 'Former Bennerley Coal Disposal Point Land' refers). It is imperative that the Country Park (and the logistics development) should also protect the open setting of Bennerley Viaduct and key views of the heritage structure (ANP Policy BV 1 'Bennerley Viaduct' and BV 2 'Bennerley Viaduct Visual Setting' refer). Likewise, the Country Park should also preserve the openness of the Green Belt and protect what is acknowledged as a sensitive gap between Awsworth and Cotmanhay. We agree the Country Park should be provided in conjunction with delivery of the logistics development and that it is vital to achieving sustainable development across the wider site. We very much welcome that the Country Park provides the crucial opportunity for biodiversity enhancement as part of the requirement for Biodiversity Net Gain.

APC also strongly support the access management plan containing details of how the Country Park will be linked to existing footpaths and recreational routes in the area. We agree that the access management plan should make clear how the site will be made accessible for a range of users and measures to prevent inappropriate vehicles such as motorbikes from accessing the site. APC consider this last aspect to be critically important to the future success and enjoyment of the Country Park and Bennerley Viaduct. Anti-social behaviour by motor bikers and quad bikers on the former Coal Disposal Point and more widely on local Rights of Way and local highways is a serious perennial problem for Awsworth residents. Its impact is felt almost daily, often for lengthy periods, involving excessive noise and posing serious safety risks for legitimate users of our local roads and byways. Development of the former Coal Disposal Point and wider site offers an opportunity to more effectively tackle this local menace.

Page 180 - Para 3.22.6 - states that 'The allocation includes 61 ha of land being removed from the Green Belt. Exceptional circumstances apply to justify the changes to the Green Belt boundaries. A significant need for logistics development has been identified and this need cannot be met through sites outside of the Green Belt. The site includes areas of previously-developed land and has a rail connection. It is therefore considered preferable to other Green Belt sites. The site has been selected following joint evidence and collaborative work with adjoining authorities'.

While APC recognise that proposed site includes previously-developed land we are concerned that valuable habitat within the site is not lost and/or compensatory provision is made. We are not persuaded that the rail connection of itself constitutes an exceptional circumstance sufficient to justify removing land from Green Belt when the likely practicality, effectiveness and viability seem highly questionable.

Page 181 - Para 3.22.7 - states that 'In order to provide permanent long-term boundaries and to follow clear physical features, it is also proposed to remove a section of the A610 from the Green Belt and land to the east of Shilo Way, within the settlement of Awsworth. This equates to 15 ha of land. However, this land does not form part of the allocation'.

APC appreciate the need to provide permanent Green Belt boundaries and accept that the A610, which now forms the northern boundary of Awsworth Parish, is a logical, defensible and enduring feature. We are less clear about the proposal to remove land to the east of (A6096) Shilo Way, within the settlement of Awsworth.

Page 181 - Para 3.22.8 - states that 'Part of the allocation, identified for a Country Park, would be retained within the Green Belt and forms an important gap between the development and Cotmanhay to the west. In accordance with the National Planning Policy Framework, compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land should be made. This can be achieved through the provision of the Country Park'.

APC very much welcome the retention of the area proposed for a Country Park within the Green Belt and recognition of the importance of the gap between the development and Cotmanhay to the west. The relatively narrow gap would be further reduced by removing the allocation site from the Green Belt, which highlights the sensitivity in this location. The proposed Rail Freight Terminal would be the closest element of the wider logistics and distribution site. Although largely open in nature, some elements of the RFT would be highly conspicuous in the local landscape and difficult to screen effectively. Although not Green Belt considerations, other impacts of a rail-connected operation (particularly noise and 24 hours working) are of real and significant concern to the local community. There would also be a significant adverse impact for users of the new Country Park and Bennerley Viaduct.

Page 181 - Para 3.22.9 - states that 'Provision of a rail-freight connection from the Erewash Valley Railway Line is required to enable rail freight to be loaded and unloaded within the site. Primary road access should be direct to and from the A610 dual carriageway, although there is potential to provide a secondary access point from Shilo Way. Road infrastructure which is impacted by the development will also need to be mitigated and the development must be designed to allow for bus access to the site. This will enable employees to travel to the site by public transport. A Travel Plan will also be required to ensure that non-car modes are maximised and to provide a long-term strategy to achieve this. This will include enhancing and providing footpaths and cycle lanes, including connections to the Bennerley Viaduct, to encourage transport by active travel measures'.

APC have commented elsewhere about our concerns regarding the Rail Freight Terminal. We strongly support that primary road access should be direct to and from the A610. We acknowledge that the existing primary access in / out junction on the south side of the A610 allows road traffic to enter from the M1 but not return directly to the motorway. Should a direct eastbound exit to the A610 be considered essential, our strong preference would be for some form of road overpass solution. While we understand that an alternative additional road access is

being considered that would connect to the A6096 Shilo Way / Gin Close Way roundabout close to Awsworth village, we have very serious concerns about the possible implications of such an arrangement for our community.

APC has very serious concerns about the traffic implications were the suggested potential to provide a secondary access point from Shilo Way (at Naptha House) to be pursued. Our clear understanding is that all parties accept the need for road access to be restricted to the A610 and not the A6096 Shilo Way. Consent has been granted for a new access road from the Naptha House junction to serve the new Visitor Centre and car park at Bennerley Viaduct. It is now expected that this will also serve a new Business Centre and car park being jointly promoted by Broxtowe Borough Council and Harworth Group. The road would also extend to meet the eastern edge of the Strategic Allocation Site and thereby allow a secondary access to the area earmarked for a Rail Freight Terminal. However, we understand promoters Harworth accept this road would not be used by HGVs but be limited to cars and vans. We would also be extremely concerned if this secondary access was developed in a way that significantly increased the number and size of vehicles entering and leaving the Rail Freight Terminal, particularly if this secondary road was physically linked to the wider Strategic Allocation Site further north to provide a through route between the A6096 and A610.

APC support that road infrastructure which is impacted by the development will also need to be mitigated but are unclear exactly what this would involve.

APC strongly support that development must be designed to allow for bus access to the site to enable employees to travel to the site by public transport. We consider that bus operators should be involved at the earliest opportunity. This could helpfully link to provision of bus services for the 250 new homes at Bennerley View.

APC welcome that a Travel Plan will also be required to ensure that non-car modes are maximised and to provide a long-term strategy to achieve this. We applaud that this will include enhancing and providing footpaths and cycle lanes, including connections to the Bennerley Viaduct, to encourage transport by active travel measures. Although Awsworth has a good network of footpaths, bridleways and cycling routes, these would greatly benefit from enhancement. While most users are respectful, a small minority cause a disproportionate amount of nuisance, noise and damage, whether through off-road biking or vandalism and criminal damage. It will be imperative that proposals for the logistics development and Country Park are designed with this in mind. These elements also require to be developed in concert with the ongoing restoration and enhancement at Bennerley Viaduct. This needs to be done in close co-operation with the Police and local councils.

Page 181 - Para 3.22.10 - states that 'Development in this location will impact the setting of the listed Bennerley Viaduct, which is important for historical and architectural reasons and which forms a major feature in the landscape of the Erewash Valley. Recent enhancements to the structure and its surroundings have arisen from the investment of significant public funds and the commitment of local amenity groups. It is therefore essential that the design of the development, including the height and siting of buildings, minimises the impact to the setting of the viaduct'.

APC fully agree it as essential that the design of the development minimises the impact to the setting of the viaduct.

Page 181 - Para 3.22.11 - states that 'There are Local Wildlife Sites (LWSs) on and adjacent to the site, and development here will inevitably impact on them. Harm to the LWSs must be mitigated or compensated for. The development must also provide a net gain in biodiversity of at least 10%. Existing Blue and Green Infrastructure (BGI) on the site should be enhanced, as should connections to adjacent BGI, including wetland areas and footpaths. The design of the Country Park should incorporate these factors. There are a number of existing public rights of way through the site. Existing public rights of way should be retained or replaced with public rights of way of enhanced quality, which should include improving accessibility to remaining Green Belt land'.

APC strongly support that harm to Local Wildlife Sites must be mitigated or compensated for, that development must provide Biodiversity Net Gain of at least 10%, and that existing Blue and Green Infrastructure and connections on the site should be enhanced as should connections to adjacent BGI. We consider it essential that design of the Country Park should incorporate all these factors. Likewise, we consider it essential that all existing public rights of way through the site are retained where possible and enhanced and are replaced with public rights of way only if necessary and that these should be of enhanced quality. We are particularly concerned about impacts on Bridleway No.17, which runs from Naptha House across the concrete access road to the Gilt Brook. Also, Footpath No.58, which runs westwards from the A6096 Gin Close Way through the northern part of the site. We are similarly concerned about the likely impact on the Gilt Brook, which runs through and alongside the allocated site. We are also concerned about Bridleway No.63 and Footpath No.16, which run between the Gilt Brook and allocation site.

Page 181 - Para 3.22.12 - states that 'There are residential uses in close proximity to the site. Any new development, including buildings, open storage areas, rail infrastructure, parking and freight transfer areas, must be screened to limit any noise and light pollution, as well as any other disturbance to local residents and the wider area. This should partly be achieved through utilising and enhancing existing green vegetation corridors which run along parts of the site's boundaries. A noise and light pollution management plan must also be provided which should include an appropriate mitigation strategy'.

APC consider the need for effectively mitigating the range of impacts which would arise from such major new development to be crucial, particularly in relation to protecting nearby residents from noise and light pollution. This should apply both to road and rail traffic movements, and extends to new buildings, open storage area, rail infrastructure, parking and freight transfer areas. In Awsworth's context this clearly has the potential to impact much of the western part of the village, especially given prevailing westerly or south-westerly winds Our experience of unwanted off-road biker noise is that the higher valley side location of much of the existing housing also tends to amplify noise generated on the floodplain.

We strongly agree that existing green vegetation corridors, which run along parts of the site boundaries, should be used and strengthened wherever possible. We agree that provision of a noise and light management plan and strategy will be critical to achieving effective mitigation. To be truly effective, we also consider that these measures should be extended to take account of those who use the existing visitor attraction at Bennerley Viaduct and the proposed new Country Park.

Page 182 - Para 3.22.13 - states that 'The site is close to areas of high deprivation and unemployment, particularly in parts of Eastwood and Ilkeston / Cotmanhay in Erewash Borough. **Local training and employment opportunities should therefore be provided** as part of the construction of the site and during the operational phases of the site'.

APC considers provision of local training and employment opportunities to be a fundamental requirement which should be attached to this scheme. Although Aysworth is not specifically referenced we believe that as one of the communities that would be most closely impacted by the development there should be some economic benefits for local people.

Page 182 - Para 3.22.14 - states that 'Parts of the site are in or adjacent to areas at higher risk of flooding. Flood mitigation and attenuation measures will be required to be incorporated into the development. The development should be designed to not have an adverse impact on playing fields adjacent to the site'.

APC support provision of necessary flood mitigation and attenuation measures. In this regard the proposed inclusion of part of the former Coal Disposal Point and other land along the River Erewash floodplain represents a sensible use of areas at higher risk of flooding which should not be used for built development. The indicative inclusion of a water body or bodies within the western part of the former Coal Disposal Point has potential contribute to reducing run-off and flood risk.

Page 182-184: Infrastructure Delivery Plan constraints / requirements summary

Transport

APC have expressed concern about feasibility of 'Provision of a freight rail link to serve the site from the existing railway line'.

As regards 'Highway infrastructure improvements including a new junction with the A610'. **APC assume reference is to upgrading existing A610 in/out junction not providing a new second junction to A610.** We have previously commented in relation to primary access being from the A610 only.

APC support 'Active travel measures including walking and cycling links including Eastwood and Ilkeston' but consider **Aysworth should be specifically mentioned.**

APC agree 'Bus facilities should be improved where required to Nottinghamshire County Council standards' and have previously commented in relation to the strategic allocation site.

APC support 'Implementation of a travel plan' as a critical element of the scheme and have previously commented.

APC note 'Parts of the site are at risk of flooding from the Gilt Brook and River Erewash and **'agree Should develop a hydraulic model for the Gilt Brook** to ensure flood risk is fully understood'. We also support 'Opportunity to reduce flood risk downstream...' and agree '...should explore opportunities to reduce flood risk to the wider catchment where possible'. We particularly agree 'Drainage from the site should be by a sustainable drainage system' and believe this could beneficially be linked to water bodies in the new Country Park. We have previously commented.

Community Services

APC strongly support 'Country Park could provide outdoor recreation for local community' and agree important to 'Ensure country park is accessible to settlements in vicinity of the site'.

Green Infrastructure / Open Space

APC note 'The site includes parts of several 'Primary and Secondary Strategic Networks' and 'Local / Neighbourhood Networks', as defined in the 'Greater Nottingham Blue and Green Infrastructure Strategy January 2022', and parts of several 'Primary and Secondary Green Infrastructure Corridors', as defined in the adopted Broxtowe Part 2 Local Plan. **APC consider it imperative that 'Development needs to link to and enhance the blue and green infrastructure corridors, particularly enhancing biodiversity and linking into recreational routes. This will include provision of a country park'.** We have previously commented.

Contamination

APC note there 'May be areas of contamination due to previous use' and **strongly agree need for 'Further investigations** as part of a planning application'.

Heritage Assets

APC note 'Grade II* Bennerley Viaduct' and fully support requirement to 'Ensure that development is sensitive to the setting of the viaduct through careful consideration of layout, building height and materials. Detailed assessments, including consideration of visual impact, will need to be undertaken'.

Page 18 – Para 3.22.15 concerns 'The **implementation, delivery and monitoring** of this Strategic Allocation policy' and **how it will be achieved.**

As regards **Targets** in relation to 'Delivery of development in line with Policy 22', **APC consider Indicator 'Provision of Country Park' to be critical for the local community of Awsworth, including in relation to the adopted Awsworth Neighbourhood Plan. APC note the Indicator 'Net additional logistics land'. APC seriously question the Indicator 'Number of trains operating per week from the rail freight terminal'** for the reasons previously given.

As regards **Policy Delivery APC welcome the suggested use of Supplementary Planning Documents (e.g. Masterplans)** to better understand and ensure new development of such size and complexity is sustainable, particularly if this enables the local community to take part and contribute.

Greater Nottingham Strategic Plan Publication Draft 2024 Policy 3 (5) (a)

Page 62 - Policy 3 – Housing Targets in relation to Awsworth proposes at (5)(a) that:

‘The remainder of homes will be provided elsewhere, including in or adjoining the Key Settlements: In Broxtowe, through existing commitments at: a) Awsworth

Page 65 - Para 3.3.17 - Policy 3: Housing Target - states that ‘**Awsworth, Eastwood and Kimberley are identified as Key Settlements.** However, the delivery of new homes at these Key Settlements over the Plan period will be achieved only through existing commitments comprising a combination of sites which have already been allocated by the Broxtowe Part 2 Local Plan (2019) and sites within the settlements which already have planning permission, or sites which come forward as infill / windfall sites. It is not proposed that there will be any further Green Belt release for residential development’.

APC support delivery of new homes only through existing commitments. As regards providing the 350 new homes required in or adjoining Awsworth Key Settlement, APC supported this provision through their adopted Awsworth Neighbourhood Plan, including a major new extension for 250 new dwellings west of the village and east of the A6096.

Greater Nottingham Strategic Plan Publication Draft 2024 Policy 4 (1)

Page 69 - Policy 4 : 'The Green Belt' (1) states that **'The boundary of the Green Belt has been recast to accommodate the allocated former Bennerley Coal Disposal Point** and allocated land at Ratcliffe on Soar Power Station, **as shown on the Policies Maps'**.

APC would comment that the area proposed to be removed from the existing Green Belt at Bennerley is extensive and equates to the area covered by the defined Awsworth Key Settlement. Almost all the land to be removed from Green Belt is located within Awsworth Parish.

We would point out that both the allocated site area and land to be removed from Green Belt are considerably more extensive than the former Bennerley Coal Disposal Point alone. That part of the former CDP within the 61 Hectares of employment land appears to comprise less than 20%.

Page 69 - Para 3.4.2 - makes clear that 'Paragraph 147 of the NPPF also says that **plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land**. Where sites are removed from the Green Belt in this Plan, compensatory measures are set out in the relevant site-specific policy'.

APC consider this requirement is imperative in the context of seeking to remove such a large area of land at Bennerley from the long-established Green Belt, which for many years has performed the vital function of preventing neighbouring built areas from merging. The area proposed to be removed from Green Belt extends more widely than just the Bennerley Strategic Allocation site. While we understand the logic for removing a section of the A610 along the northern edge of the Allocation site, APC are concerned that the valuable landscape screening role should be maintained, particularly as regards tree screening, especially if large warehouses are constructed close along the south side of the A610.

In this regard, we consider it imperative that the design of employment units, their orientation and associated landscape screening is sympathetic, both to the narrower retained area of open Green Belt (more especially as this is proposed to become the core of a new Country Park) and the heritage asset of Bennerley Viaduct, such that views from and to both the listed viaduct and Country Park are protected. For example, we expect this should include innovative but effective design solutions, both for the buildings and their surrounds, such as the use of green roofs and landscaped earth mounds combined with extensive native tree cover. The layout of buildings and associated access roads, circulation space and parking areas should seek to minimise the operational impact of the logistics development, on the listed structure and Country Park in particular, but also the wider locality as far as possible.

Greater Nottingham Strategic Plan Publication Draft 2024 Policy 5

Page 71 - Policy 5 - 'Employment Provision and Economic Development' (1)(f) states 'The provision of up to 97.4 hectares for **strategic distribution floorspace at the following sites:** • **Former Bennerley Coal Disposal Point (61 hectares)** • Land at Ratcliffe on Soar Power Station (part site up to 36.4 hectares'.

APC note that the eastern part of the former CDP within the 61 Hectares proposed for strategic distribution floorspace appears to comprise less than 20% of the total area. We are concerned that this area, proposed for the Rail Freight Terminal, is drawn uncomfortably close to the north side of Bennerley Viaduct. We are also concerned to ensure that the consented secondary access road from A6096 Shilo Way, which will serve the new Bennerley Viaduct Visitor Centre and Business Centre, is also capable of providing future access to essential visitor car parking at the Country Park.

END