

30th January 2014**Agenda Item: 7****REPORT OF THE CORPORATE DIRECTOR FOR POLICY, PLANNING AND
CORPORATE SERVICES****BROXTOWE BOROUGH COUNCIL SITE SPECIFIC ALLOCATIONS
DOCUMENT****Purpose of the Report**

1. To inform Committee of the formal response which was agreed by the Chairman and sent to Broxtowe Borough Council on the 10th January 2014 in response to the request for comments on the Broxtowe Borough Council Site Specific Allocations Document 2013.

Information and Advice

2. Nottinghamshire County Council (NCC) has been asked for strategic planning observations on the Broxtowe Borough Council Site Specific Allocations document (SSAD) and this report compiles responses from Departments involved in providing comments and observations on such matters. The consultation period ran from the 4th November 2013 until the 10th January 2014.

Background Information

3. Broxtowe Borough Council has prepared a Site Specific Allocations Document (SSAD) local plan, the document is the first consultation on an emerging document which will form part of the new Broxtowe Local Plan to replace the 2007 saved Local Plan policies, alongside the Broxtowe Core Strategy; and the Development Management Policies local plan which will follow.
4. The purpose of the document is to commence the selection of sites for housing, employment and protection of environmental assets, amongst any other land uses, which require site allocation across Broxtowe Borough.
5. The local plan is intended to:
 - allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and amount of development where appropriate;

- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance.

Key Issues for Nottinghamshire

6. Nottinghamshire County Council has a significant interest in the production of a Local Plan for the Broxtowe Borough area. The County Council is a strategic planning authority in terms of service provision and the interests of its residents, community groups and businesses, as well as the concerns of the environment and heritage assets within the county. It is therefore important that up-to-date, relevant and robust plans, within Nottinghamshire are in place to assist the County Council in meeting its service requirements and helping to make Nottinghamshire a prosperous place.

Highways

7. The strategic transport assessments have, through the Aligned Core Strategy already considered the likely transport impacts of all development in Broxtowe. At a strategic level there will be a need for each individual development site to be accompanied by a site specific Transport Assessment (or transport statement for smaller sites) and where smaller sites are clustered a cumulative impact transport assessment may also be necessary, these are required to identify the local highway and transport impacts of development and to secure their provision.
8. The County Council has no strategic highways comments to make as the document drills down to the local site level and does not address strategic sites or transport policies which are already covered in the Core Strategy document and which have been considered in detail at the recent Greater Nottingham Aligned Core Strategy Examination in Public.
9. Detailed Highway comments are set out in Appendix 1.

Minerals

10. The National Planning Policy Framework (NPPF) requires local plans to include policies on minerals safeguarding and consultation areas. Appendix 2 shows the mineral safeguarding and consultation areas within Nottinghamshire, as set out in the County Council's Minerals Local Plan Preferred Approach document (2013).
11. The County Council does not wish to raise any significant concerns at the SSAD stage, however, a reference to the County's Safeguarding and Consultation Areas (See Appendix 2) should be included in the document to ensure consistency with the NPPF and the Nottinghamshire Minerals Local Plan.

Waste

12. Nottinghamshire County Council, in its role as the statutory Waste Planning Authority for Nottinghamshire, has recently prepared a new joint Waste Core Strategy with Nottingham City Council. This was adopted on the 10th December 2013 and sets out the strategic approach towards the provision of essential future waste management infrastructure such as recycling plants, energy from waste plants and landfill. The document will form part of the Development Plan for all parts of Nottinghamshire and Nottingham alongside existing or emerging District/Borough Local Plans and any neighbourhood plans which are prepared.
13. The Waste Core Strategy identifies broad locations where future development is likely to be acceptable but does not allocate any specific sites as this will be carried out in separate supporting policies that will be subject to further consultation and public examination. In broad terms facilities for the sorting, processing and treatment of waste are supported in, or close to, the main urban areas of Nottingham, Mansfield/Ashfield, Newark, Worksop and Retford. Within these broad locations development will be focused on existing or proposed employment sites and other derelict or previously developed land in order to minimise environmental impacts. Limited provision is also made for small-scale recycling or recovery facilities in other rural locations where these can meet a specific local need; especially where this would allow for the re-use of existing farm or forestry buildings.
14. The Waste Core Strategy approach reflects both the need to meet future European and national waste recycling and recovery targets, to manage waste close to source, and the anticipated requirement for additional waste management facilities to support planned housing and economic growth.
15. Delivery of the Waste Core Strategy will depend upon the availability of a suitable range of employment land able to accommodate a mix of essential waste management infrastructure such as recycling, waste transfer and energy recovery. National policy within the NPPF recognises waste management as an employment use and adequate provision is therefore needed for waste related development within local employment policies. Whilst this would not necessarily require separate provision, local planning authorities will need to be mindful of this when assessing the amount and type of employment land to be provided in their area and also when considering releasing established employment/industrial land for other uses.
16. The County Council therefore intends to continue to work closely with each of the local district/borough councils the County area to identify appropriate locations for future waste management facilities and would welcome the opportunity to discuss the suitability of existing or proposed employment sites within the Broxtowe Local Plan Site Allocations Document for appropriate waste uses.
17. The Council would also highlight national waste planning policy in PPS10: Planning for Sustainable Waste Management, and the draft Updated National Waste Planning Policy issued for consultation in June 2013, which stresses the importance of an integrated approach towards waste management planning from all local planning authorities, not just waste planning authorities. In particular, paragraph 35 of PPS10 stresses the importance of good design in the layout of

new development to ensure that there is sufficient provision for waste management. This could include the provision of supporting waste infrastructure and integrating opportunities for heat and/or power from energy from waste developments with other local development where viable.

18. Another important consideration in allocating and determining possible development sites, particularly for sensitive uses such as housing, will be whether the proposal could impact upon the operation of an existing or allocated waste management facility which has been identified for safeguarding. The intended approach to safeguarding is set out within Policy WCS9 of the Waste Core Strategy and its supporting text.

Developer Contributions

19. The SSAD does not contain a specific policy on developer contributions. The County Council would seek to ensure that all impacts on its services and infrastructure from future development in adjacent areas is met either through CIL or planning obligations. The County Council would welcome involvement in the development of any CIL(s), in particular with the drawing up of the CIL Regulation 123 list.

Ecology

20. From an ecological perspective it should be noted that in a number of cases, reference to up-to-date aerial photos indicates that undesignated sites may have value, either as areas of habitat in their own right, or as habitat for protected species. Aerial photo interpretation is not an exact science, and therefore only those sites which appear likely to have more significant nature conservation value have been highlighted, particularly areas of semi-improved grassland, scrub, hedgerows and woodland (however, this means that other sites may have been overlooked). In order to allow a fully informed decision to be made it is recommended that ecological assessments of identified sites are carried out before they are allocated for development.
21. In addition, concerns are raised over the number of sites which are wholly or partly designated as Sites of Important Nature Conservation (SINCs) which are under consideration for development. It is suggested that these should not be considered further.
22. Detailed Ecology comments are set out in Appendix 3.

Landscape and Visual Impact

23. There is no reference to the Greater Nottingham Landscape Character Assessment (LCA) within the Infrastructure Delivery Plan (IDP) Constraints/Requirement Summary. The LCA examines the landscape condition and sensitivity of each of the policy zones and defines a policy based on detailed assessment of the area. These policies e.g. Conserve/Restore/ Create should be used to inform appropriate actions for change within the landscape and the built environment and this is an opportunity for the LCA to guide development. Ideally under the heading *Green Infrastructure* within the IDP the general statement

“Opportunities to enhance Green Infrastructure to be explored as proposals emerge” should be reconsidered on the premise that Green Infrastructure should be part of the proposals and inform the planning and design of the site from the outset.

24. There is no subheading for Landscape Character under the heading *“Locally Distinctive Issues”*. Heritage Issues are referred to within which landscape issues are occasionally referenced. Where relevant, particularly on the larger more rural sites, Landscape Character issues should also be referenced.
25. The published Sites Constraints for each site has a subheading *Landscape Quality and Character*. This is often referenced with NA, presumably where the site is small or located within a more urban context. There appears to be some inconsistency in the type of information under the heading *Landscape Quality and Character*. Sometimes this contains information as to if the site is within an Mature Landscape Areas (MLA) or not, sometimes the current land use e.g. agricultural fields or occasionally a casual comment as to its quality e.g. “farmland nothing of any significant merit” . The Landscape Character, as described within the Greater Nottingham Landscape Character Assessment has not been referenced although it is given as an evidence base (bullet point 8, page 8, Broxtowe Site Allocations Issues and Options November 2013). This would help to steer a more consistent and informed approach to commenting on landscape character.
26. A Prominent Area for Special Protection (e.g. Site Ref 298 Spring Farm Nottingham Road Trowell Moor) has also been identified under the heading Landscape Quality and Character although it appears that this has not been defined or referenced in the documents.
27. Detailed Landscape and Visual Impact comments are set out in Appendix 4.

Property Interests

28. The County Council’s property team will be submitting a separate response to the consultation based solely on its land ownership interests at Walker Street, Eastwood and Springbank School. It was considered that the SSAD would not adversely impact upon the future development of the sites. As such the County Council does not wish to raise any Property objections to the SSAD.

Overall Conclusions

29. The County Council has no strategic highways comments to make as the document drills down to the local site level and does not address strategic sites or transport policies which are already covered in the Core Strategy document and which have been considered in detail at the recent Greater Nottingham Aligned Core Strategy Examination in Public.
30. The County Council does not wish to raise any significant concerns at the SSAD stage however a reference to the County’s Safeguarding and Consultation Areas

should be included in the document to ensure consistency with the NPPF and the emerging Nottinghamshire Minerals Local Plan.

31. The County Council does not wish to raise any objections from a Waste perspective.
32. The County Council would seek to ensure that all impacts on its services and infrastructure from future development in adjacent areas is met either through CIL or planning obligations. The County Council would welcome involvement in the development of any CIL(s), in particular with the drawing up of the CIL Regulation 123 list.
33. The County Council raises concerns over the number of sites which are wholly or partly designated as Site of Important Nature Conservation (SINCs) which are under consideration for development, it is considered that these sites should not be developed. In addition it is recommended that detailed ecological assessments of identified sites are carried out before they are allocated for development.
34. In terms of landscape and visual impact, the County Council raise concerns regarding the inconsistency in relation to the type of information stated. More detailed comments are set out in Appendix 4.
35. The County Council do not wish to raise any Property objections to the SSAD from a property perspective.
36. Following consultation with the Chair of Environment and Sustainability Committee the above comments were sent to Broxtowe Borough Council.

Other Options Considered

37. As the consultation requires representations to be made on the plan the only other option was not to make representations. This was considered and rejected as the education and transport interests of the County Council as service provider could be compromised by the lack of a suitable Local Plan.

Reason for Recommendation

38. Having assessed the SSAD, the principle of the document is supported however, the County Council raise significant concerns in relation to the ecological impact of the potential development of a number of SINC sites.

Statutory and Policy Implications

39. This report has been compiled after consideration of implications in respect of finance, the public sector equality duty, human resources, crime and disorder, human rights, the safeguarding of children, sustainability and the environment and those using the service and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

Financial Implications

40. There are no direct financial implications.

Implications for Sustainability and the Environment

41. The failure to consider the representations of the County Council on strategic planning and transport matters could lead to unsustainable development taking place, possibly without the adequate context of an adopted Local Plan. The education and transport interests of the County Council as service provider could also be compromised by the lack of a suitable Local Plan or Local Development Framework.

RECOMMENDATION

1) That Committee note the officer response approved by the Chairman which was sent to Broxtowe Borough Council on the 10th January 2014.

Jayne Francis-Ward

Corporate Director, Policy, Planning and Corporate Services

For any enquiries about this report please contact: Nina Wilson, Principal Planning Officer, Planning Policy Team, 0115 97 73793

Constitutional Comments (SHB.1.12.13)

42. This report is for noting only so no constitutional comments are required.

Financial Comments (SEM 02/12/13)

43. There are no specific financial implications arising directly from this report.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

Electoral Division(s) and Member(s) Affected

Beauvale - Councillor John Handley

Beeston North - Councillor Steve Carr

Beeston South and Attenborough - Councillor Kate Foale

Bramcote and Stapleford - Councillor Stan Heptinstall MBE and Councillor Jacky Williams

Chilwell and Toton - Councillor Dr John Dodd and Councillor Richard Jackson

Eastwood - Councillor Keith Longdon

Kimberley and Trowell - Councillor Ken Rigby

Nuthall - Councillor Philip Owen

Appendix 1 – Detailed Highways Comments

I have had the time to consult with highways development control and trust that they will supply their observations independently.

I have read the allocations documents which make up the Broxtowe Borough Council Issues and Options Consultation. This sets out area based policies in 7 separate documents.

I would make the following observations;

The Aligned Core Strategies work has identified large strategic sites in Broxtowe and these have been Examined in Public. Whilst the Issues and Options consultation makes reference to the named strategic sites it is clear that this consultation is focussed on identifying a significant number of smaller housing and employment sites to meet the overall housing and employment supply in the district. Although these sites are not identified within the high level Core Strategy (CS) and are not explicitly modelled in the supporting CS transport assessments the overall transport impact of the total quantum of development on non-strategic sites in Broxtowe has already been taken into consideration. In which case it should be noted that all development no matter how small will need to contribute towards a package of transport infrastructure required to support all new development in the Borough. The Broxtowe Infrastructure Delivery Plan (May 2013 version 3) identifies the strategic transport infrastructure package that all development will need to contribute towards. It is understood that Broxtowe Borough Council are considering the introduction a Community Infrastructure Levy which is well suited to delivering such area-wide transport improvements.

Although the strategic transport assessments have already considered the likely transport impacts of all development in Broxtowe at a strategic level there will be a need for each individual chosen development site to be accompanied by a site specific Transport Assessment (or transport statement for smaller sites) and where smaller sites are clustered a cumulative impact transport assessment may also be necessary, these are required to identify the local highway and transport impacts of development and to secure their provision.

I would be grateful if you could incorporate these observations in your report.

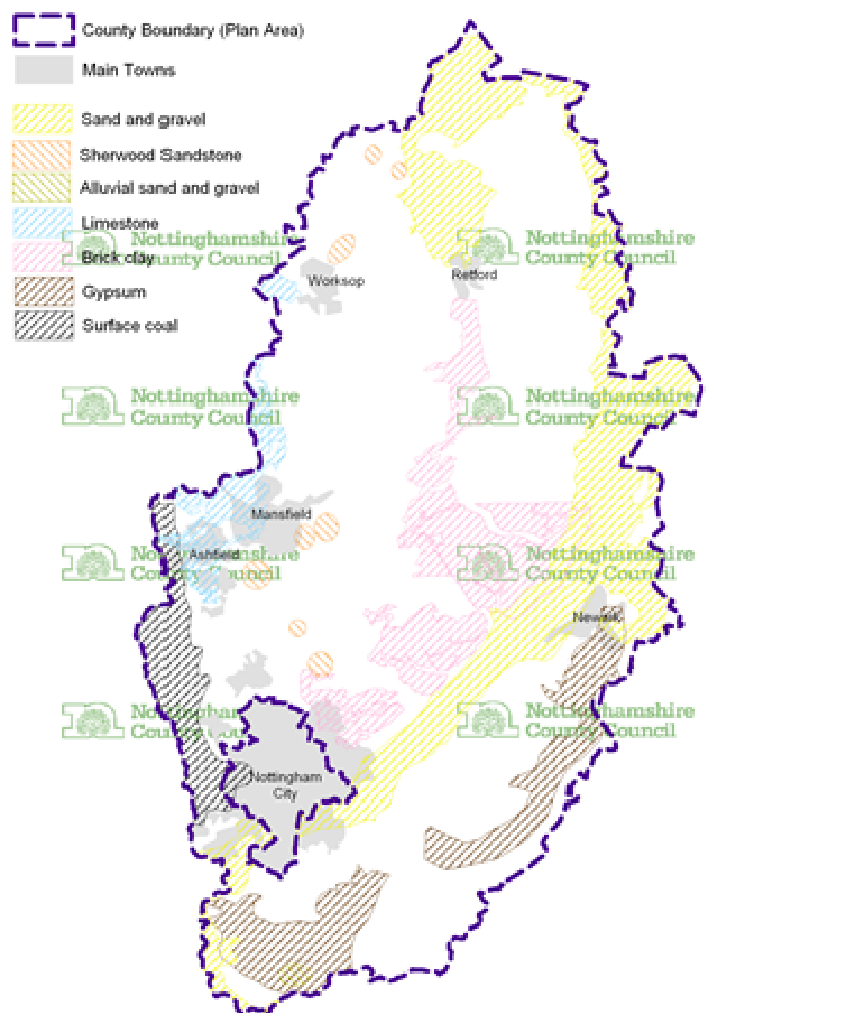
Kind regards

David Pick
Environment and Resources
Nottinghamshire County Council
Telephone 0115 977 4273

Appendix 2 – Minerals Safeguarding and Consultation Areas within Nottinghamshire

Plan 6: Mineral Safeguarding and Consultation Areas

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British Geological Survey, 2003. Digital Geological Map of Great Britain 1:625 000 scale (DigMapGB-625)
Superficial Deposits data (CD-Rom) Version 1.10. Keyworth, Nottingham: British Geological Survey. Release date 30-04-2003.

British Geological Survey, 2003. Digital Geological Map of Great Britain 1:625 000 scale (DGM03-625).
 Superficial Deposits data (CC-Rod) Version 1.10. Keywords: Bathography. British Geological Survey. Release date: 30.04.2005

Appendix 3 – Detailed Ecology Comments

Thank you for consulting the Nature Conservation Unit of the Conservation Team on the above matter. We have the following comments regarding nature conservation issues:

General

The following comments are made based on existing ecological information, such as the location of designated nature conservation sites. However, it should be noted that in a number of cases, reference to up-to-date aerial photos indicates that undesignated sites may have value, either as areas of habitat in their own right, or as habitat for protected species. Aerial photo interpretation is not an exact science, and therefore only those sites which appear likely to have more significant nature conservation value have been flagged up below, particularly areas of semi-improved grassland, scrub, hedgerows and woodland (however, this means that other sites may have been overlooked). In order to allow a fully informed decision to be made, I strongly recommend that ecological assessments of identified sites are carried out before they are allocated for development.

In addition, it is concerning to see that several sites which are wholly or partly designated as SINCs are under consideration for development. It is suggested that these should not be considered further.

Sites containing SINCs/LWSs

Awsworth

- H190: This site is covered in significant part by SINC 2/256. The site is species-rich neutral grassland, and would need to be protected from development.

Eastwood

- H206: This site is partly covered at its southern end, by SINC 2/274. The site is a marshy grassland, and would need to be protected from development.

Kimberley

- H103: This site is covered in its entirety by SINC 5/753. The site is species-rich calcareous grassland, and should not be taken forward for development.
- H131: This site is covered in its entirety by SINC 2/276. The site is species-rich neutral grassland, and should not be taken forward for development.
- H234: This site is covered in its entirety by SINC 5/753. The site is species-rich calcareous grassland, and should not be taken forward for development.
- H215: This site is partly covered by SINC 2/140. The site is a disused railway, and would need to be protected from development.

- E31: This site is partly covered by SINC 2/140 and SINC 2/276. These parts of the site are a disused railway and are of species-rich neural grassland, and would need to be protected from development.

Main Built-up Area

- H220: This site is partly covered by SINC 2/57. The site is an area of parkland, grassland woodland and ponds, and would need to be protected from development.
- H111: This site is partly covered by SINC 2/304, which is a woodland; this would need to be protected from development.
- H107: This site is partly covered by SINC 5/755, which is a woodland; this would need to be protected from development.
- H358: This site is partly covered by SINC 5/2210. This is a mosaic of habitats on railway sidings which would need to be protected from development.
- H104: This site is partly covered by SINC 2/6. The site is a canal, and would need to be protected from development.

Other rural

- H189: This site is partly covered by SINC 2/6. The site is a canal, and would need to be protected from development.

Sites adjacent to designated sites

Brinsley

- H376: This site is adjacent to SINC 5/3405, and mitigation for indirect impacts would be required, which may include a buffer zone.
- H198: This site is adjacent to SINC 5/2302, and mitigation for indirect impacts would be required. This would include the retention of a significant green corridor/buffer along the Brinsley Brook.
- H197: This site is adjacent to SINC 5/2328 (which it would enclose on two of its three sides) and SINC 2/167. Mitigation for indirect impacts would be required, which may include buffer zones.

Eastwood

- H313: This site is adjacent to SINC 2/245 and mitigation for indirect impacts would be required, which may include a buffer zone.

- H3: This site is adjacent to SINC 5/273. It appears that the SINC boundary at this location is fairly arbitrary and it is not clear why it does not cover the whole land parcel. Clarification should be sought from the Nottinghamshire Biological and Geological records Centre to establish that the SINC boundary is in the correct place. In any event, mitigation for indirect impacts would be required, which may include buffer zones, and mitigation for direct impacts may also be required which could include avoiding development of the undesignated part of the eastern land parcel.
- H206: As well as being partly covered by SINC 2/274 (see above), the eastern boundary of this site runs along SINC 2/253. Mitigation for indirect impacts would be required, which would include the retention of a significant green corridor/buffer along the Brinsley Brook.
- H203: This site is adjacent to SINC 2/259 and mitigation for indirect impacts would be required, which may include a buffer zone.
- E35: This site is adjacent to SINC 2/245 and mitigation for indirect impacts would be required, which may include a buffer zone.

Kimberley

- H428: This site is adjacent to Kimberley Railway Cutting SSSI and SINC 2/71 and mitigation for indirect impacts would be required, which may include a buffer zone. Natural England should be consulted regarding potential impacts on the SSSI.
- H145: This site is adjacent to Kimberley Railway Cutting SSSI and SINC 2/71 and mitigation for indirect impacts would be required, which may include a buffer zone. Natural England should be consulted regarding potential impacts on the SSSI.
- H411: This site is adjacent to SINC 2/140 and mitigation for indirect impacts would be required, which may include a buffer zone.

Main Built-up Area

- H123: This site is adjacent to SINC 5/1086 and mitigation for indirect impacts would be required, which may include a buffer zone.
- H108: This site is adjacent to SINC 5/1086 and mitigation for indirect impacts would be required, which may include a buffer zone.
- H133: This site is adjacent to SINC 5/2210 and mitigation for indirect impacts would be required, which may include a buffer zone.

Other rural

- H513: This site is adjacent to SINC 2/319 and mitigation for indirect impacts would be required, which may include a buffer zone.

Site supporting habitat which may have nature conservation value

(Note: the sites identified below are those which appear to have the most potential to have nature conservation value. Other sites may also have nature conservation value for the habitats they support, or may support protected species).

Awsworth

- H192: Aerial photos indicate that much of this area is covered in rough grassland, scrub and hedgerows which may have nature conservation value and may support protected species.

Eastwood

- H125: Aerial photos indicate that the site is a remnant area of neutral grassland (the majority of which was lost to the new primary school).
- H519: Aerial photos indicate that the site is an area of grassland and scrub.
- H143: Aerial photos indicate that the site is an area of grassland and scrub.
- H146: Aerial photos indicate that the site is an area of grassland and hedgerows.
- H138: Aerial photos indicate that the site is an area of grassland, scrub and post-industrial habitat.
- H130: Aerial photos indicate that a significant part of the site is an area of grassland and scrub.
- H204: Aerial photos indicate that the site is an area of grassland and hedgerows.
- H206: As well as being partly covered by SINC 2/274 and adjacent to SINC2/253, aerial photos indicate that the site is an extensive area of grassland and hedgerows.
- H203: As well as being adjacent to SINC 2/259, aerial photos indicate that parts of the site include areas of grassland and hedgerows.
- E36: Aerial photos indicate that a significant part of the site is an area of grassland and scrub.

Kimberley

- H145: Aerial photos indicate that the site is an area of grassland.
- H144: Aerial photos indicate that the site is an area of grassland and trees.

- H586: Aerial photos indicate that a significant part of the site is an area of woodland.
- H218: I believe that this site contains a pond which hosts Great Crested Newts.
- H105: Aerial photos indicate that the site is an area of grassland.
- H411: As well as being adjacent to SINC 2/140, aerial photos indicate that the site is an area of grassland and scrub.
- H285: Aerial photos indicate that the site is an area of grassland and mature hedgerows.
- H271: Aerial photos indicate that the site is an area of grassland and hedgerows.
- H215: As well as being partly covered by SINC 2/140 (see above), aerial photos indicate that the site contains area of grassland, hedgerows and scrub.
- E30: Aerial photos indicate that a significant part of the site is an area of woodland.
- E31: As well as being partly covered by SINC 2/140 and SINC 2/276 (see above), aerial photos indicate that the site contains area of grassland and scrub.

Main Built-up Area

- H258: Aerial photos indicate that a significant part of the site is grassland and scrub.
- H215: As well as being adjacent to SINC 5/1086 (see above), aerial photos indicate that the site contains area of grassland and scrub.
- H410: Aerial photos indicate that part of the site is grassland and scrub.
- H111: As well as being partly covered by SINC 2/304, aerial photos indicate that the site contains area of grassland and woodland on the northern part of the site.

Other rural

- H513: As well as being partly covered by SINC 2/319, aerial photos indicate that the site is an area of grassland and scrub.
- H189: As well as being partly covered by SINC 2/6, aerial photos indicate that the site is an area of grassland, hedgerows and scrub.

We trust you will find the above comments of use, but if you require any further information, please do not hesitate to contact us.



Nick Crouch.

Nick Crouch

Appendix 4 – Detailed Landscape and Visual Impact Comments

The following documents have been looked at in response to the above consultation:

- *Site Allocation Borough Over View,*
- *Awsorth,*
- *Brinsley,*
- *Eastwood,*
- *Kimberley ,*
- *Main Built up Area,*
- *Other Rural.*

Due to the timescale these are general comments only, and detailed responses to individual sites have not been given.

1. There has been no reference to the Greater Nottingham Landscape Character Assessment within the Infrastructure Delivery Plan (IDP) Constraints/Requirement Summary. The LCA examines the landscape condition and sensitivity of each of the policy zones and defines a policy based on detailed assessment of the area . These policies e.g. Conserve/Restore/ Create should be used to inform appropriate actions for change within the landscape and the built environment and this is an opportunity for the LCA to guide development. Ideally under the heading *Green Infrastructure* within the IDP the general statement “*Opportunities to enhance Green Infrastructure to be explored as proposals emerge*” should be reconsidered on the premise that Green Infrastructure should be part of the proposals and inform the planning and design of the site from the outset.
2. There is no subheading for Landscape Character under the heading “*Locally Distinctive Issues*”. Heritage Issues are sometimes referred to within which landscape issues are occasionally referenced. Where relevant, particularly on the larger more rural sites, Landscape Character issues should also be referenced.
3. The published Sites Constraints for each site has a subheading *Landscape Quality and Character*. This is often referenced with *NA*, presumably where the site is small or located within a more urban context. There appears to be some inconsistency in the type of information under the heading *Landscape Quality and Character* . Sometimes this contains information as to if the site is within an MLA or not, sometimes the current land use e.g. agricultural fields or occasionally a casual comment as to its quality e.g. “ farmland nothing of any significant merit” . The Landscape Character, as described within the Greater Nottingham Landscape Character Assessment has not been referenced although it is given as an evidence base (bullet point 8, page 8, Broxtowe Site Allocations Issues and Options November 2013). This would help to steer a more consistent and informed approach to commenting on landscape character.

4. A Prominent Area for Special Protection (e.g. Site Ref 298 Spring Farm Nottingham Road Trowell Moor) has also been identified under the heading Landscape Quality and Character although as far as I can see this has not been defined or referenced in the documents.

To summarise some consistency and clarity as to what is understood to be Landscape Quality and Character should be given. The status of MLAs may also require clarification as I understand that they were a saved policy until the new Local plan is adopted.