

TROWELL PARISH COUNCIL

FORMAL CONSULTATION RESPONSE

Planning Application 26/00427/FUL

Land East of 256–280 Stapleford Road, Trowell

1. Introduction

Trowell Parish Council considered Planning Application **26/00427/FUL** at an Extraordinary Meeting held on **Friday 31 July 2026**.

The meeting was convened specifically to consider the proposed development and agree the Parish Council's formal consultation response to Broxtowe Borough Council.

In reaching its decision, the Parish Council considered:

- the plans and supporting documents published on the planning portal;
- the Clerk's Report;
- the Council's Historical Background Report;
- written representations received from residents;
- representations made during the extended Public Forum;
- the observations and local knowledge of Members; and
- the material planning considerations arising from the proposal.

Following consideration of the application, the Council resolved:

That Trowell Parish Council objects to Planning Application 26/00427/FUL and instructs the Clerk to submit the Council's consultation response to Broxtowe Borough Council, setting out the material planning reasons for objection as agreed by the Council and residents at the meeting.

This response represents the formal position of Trowell Parish Council as a statutory consultee.

The Parish Council recognises that Broxtowe Borough Council, as the Local Planning Authority, is responsible for determining the application. The purpose of this response is to assist that determination by setting out clearly and comprehensively the planning matters that led the Parish Council to object.

The Council has assessed the application in full, including the proposed housing mix, affordable housing, public open space, play provision and landscaping. Having weighed

those matters against the identified planning impacts, the Council considers that they do not outweigh the significant and unresolved harm arising from the proposal.

The Parish Council is not satisfied that the applicant has demonstrated that the development can be delivered without unacceptable harm in relation to:

- flood risk and the cumulative effect upon the Boundary Brook catchment;
- the possible loss or restriction of strategic flood-storage opportunities;
- drainage and proposed alterations to existing watercourses;
- Green Belt openness and countryside encroachment;
- settlement separation and the distinct identity of Trowell;
- landscape character and visual amenity;
- highway safety and the relationship between the site access and existing residential driveways;
- residential amenity;
- biodiversity and the substantial loss of habitat value within the site;
- established trees and hedgerows;
- local healthcare, services and infrastructure;
- the adequacy of public transport and the risk of increased car dependency;
- the effect upon protected species and their habitats;
- uncertainty regarding ground conditions, made ground and the implications for drainage and construction;
- whether development of this greenfield site accords with the development plan and the proper prioritisation of previously developed land;
- the cumulative effect upon community health and wellbeing; and
- the completeness, consistency and deliverability of the submitted technical information.

The Council therefore formally objects to the application for the reasons set out in this response.

2. Executive Summary and Overall Position

Having reviewed the submitted application documents and the matters raised at the Extraordinary Meeting, Trowell Parish Council concludes that the proposal has not been shown to represent an acceptable or sustainable form of development.

The Council's objection is not based upon a general opposition to housing development. It arises from the particular characteristics of this site, the relationship of the proposal with surrounding development and infrastructure, and the absence of satisfactory evidence addressing a number of significant planning risks.

2.1 Flood risk

The application site is within Flood Zone 1. However, that classification does not resolve the wider question of whether development of the site could contribute to increased flood risk elsewhere within the Boundary Brook catchment.

The Parish Council is not satisfied that the submitted Flood Risk Assessment demonstrates that the cumulative effects of this proposal, the Field Farm development, Hulks Farm, the cricket facilities and other development within the catchment have been assessed collectively.

The Council considers that compliance with a restricted discharge rate for the application site cannot, by itself, establish that the cumulative effect upon downstream properties is acceptable.

2.2 Drainage

The submitted Drainage Strategy relies upon a detention basin, flow controls, permeable surfaces, rain gardens, filter drains, alterations to the existing ditch network and discharge into an ordinary watercourse.

Important elements remain subject to Lead Local Flood Authority approval and Ordinary Watercourse Consent. The strategy drawing remains marked preliminary and not for construction. The Council has also identified an apparent inconsistency between drainage discharge figures within the submitted material.

The Parish Council therefore considers that the drainage solution has not been demonstrated to be fully resolved, approved or secured.

2.3 Green Belt and settlement separation

The applicant argues that the site may be regarded as Grey Belt and that development would not cause unacceptable Green Belt harm.

The Parish Council does not accept that this assessment gives sufficient weight to the site's existing openness, its relationship with the countryside, its position on the approach into Trowell and its continuing role in maintaining a visual and physical break between built areas.

The development would permanently replace an undeveloped field with housing, roads, parking, lighting and associated infrastructure. The Council considers that this would result in material harm to openness and further encroachment into the countryside.

2.4 Landscape and visual effects

The Landscape and Visual Impact Assessment describes the site as a contained urban-fringe parcel with medium-low landscape value. However, the applicant's own photographic evidence shows that the site remains a substantial and visibly open field, particularly when viewed from nearby routes and the eastern side of the site.

The LVIA acknowledges that users of the Robin Hood Way and Local Nature Reserve gateway would experience a **major to moderate adverse visual effect at Year 1**, relying upon future structural planting to reduce that effect over time.

The Council considers that proposed planting would not replace the present openness of the land and that the development would cause a permanent urbanising change to the local landscape and the approach into Trowell.

2.5 Highway safety

The Transport Statement focuses principally upon junction capacity, predicted vehicle movements and whether the effect upon the highway network would be severe.

Residents living immediately opposite and adjacent to the site described existing difficulty entering and leaving their driveways and reported near misses associated with traffic on Stapleford Road. Particular concern was raised regarding the proposed site access being positioned opposite an existing residential driveway.

The Council considers that calculated junction capacity does not adequately address the safety and practical operation of individual residential accesses.

2.6 Public transport and sustainable accessibility

The applicant places reliance upon nearby bus stops and the availability of sustainable travel options. However, the Parish Council is not satisfied that the submitted evidence demonstrates that existing public transport services are sufficiently frequent, convenient or comprehensive to meet the everyday needs of residents of the proposed development.

The presence of a bus stop within walking distance does not, by itself, establish that residents would have a realistic alternative to private-car use. The Council considers that the frequency, destinations, operating hours, reliability and capacity of available services should be assessed, together with the cumulative demand arising from recent and proposed development.

Without such evidence, the Council considers that the proposal risks increasing car dependency and adding further pressure to the surrounding highway network.

2.7 Trees and hedgerows

The Arboricultural Impact Assessment confirms that the proposed access would require the removal of three Category B Lime trees, one Goat Willow and approximately 32 metres of existing hedgerow.

The Lime trees are described within the applicant's own assessment as prominent in views from Stapleford Road and nearby residential properties. The proposal would therefore cause an immediate loss of established roadside canopy and visual amenity.

The scheme would also result in excavation within the Root Protection Areas of several retained trees, including encroachment of 29% and 24.5% in two cases. The report acknowledges that some encroachments exceed normal guidance and relies partly upon assumed historic root disturbance.

2.8 Biodiversity

The applicant's Biodiversity Net Gain Assessment confirms that the proposed development would result in a loss of **3.40 on-site habitat units**, equivalent to a **30.49% reduction**.

The required statutory gain would not be achieved within the application site. The report states that **4.52 off-site habitat units** would be required, but the location and delivery mechanism have not yet been identified.

The Parish Council recognises that off-site provision may be permitted under the statutory system. However, that does not alter the fact that the biodiversity value of the application site itself would be substantially reduced.

2.9 Protected species and ecological connectivity

The Parish Council notes that ecological surveys have been submitted. However, Members remain concerned about the effect of the proposal on protected species and the habitats and movement corridors upon which they depend, including nesting and foraging birds, bats and any protected riparian species associated with the ditch and Boundary Brook corridor.

The Council is not satisfied that the loss and fragmentation of existing grassland, scrub, hedgerows and watercourse-edge habitat can be treated solely as a matter of numerical Biodiversity Net Gain. The Local Planning Authority should be satisfied that the survey effort is complete, that all necessary species-specific mitigation is secured and that retained and newly created habitats will remain connected and functional throughout construction and occupation.

2.10 Ground conditions and made ground

Members raised concern that parts of the site may comprise made or previously disturbed ground. The Parish Council does not make a technical finding on this matter, but considers that any such conditions could affect infiltration, surface-water behaviour, compaction and the design of foundations and drainage infrastructure.

The Council therefore considers that the application should not be determined until the Local Planning Authority is satisfied that the ground investigation is sufficient to establish the nature and extent of any made ground, its effect on the drainage assumptions and the suitability of the proposed construction and foundation strategy.

2.11 Development plan and use of greenfield land

The Parish Council is not satisfied that the application has demonstrated that residential development of this undeveloped Green Belt field accords with the adopted development strategy. The site is not understood to be an allocated housing site within the adopted Local Plan.

The Council considers that the Local Planning Authority should give careful consideration to the availability and proper prioritisation of previously developed land, and should be satisfied that

the release of this greenfield site is justified by the development plan and current national policy rather than being treated as acceptable merely because the remaining gap is limited in size.

2.12 Healthcare, community health and local infrastructure

The Health Impact Assessment estimates that the development would result in a population increase of up to 138 people. It does not demonstrate that local healthcare facilities possess sufficient capacity to accommodate that growth. Instead, it states that the applicant would agree to a financial contribution if one were requested.

The Council also considers that the Health Impact Assessment gives insufficient weight to the potential effects of the permanent loss of open countryside, continued urbanisation, construction disturbance, traffic pressure and reduced access to an existing open landscape upon the mental and physical wellbeing of existing residents. These effects should be considered cumulatively and not only by reference to facilities proposed within the development itself.

The Parish Council considers that the existence of nearby facilities is not evidence that those facilities have adequate capacity, particularly when the cumulative impact of other development is taken into account.

2.13 Overall conclusion

The Parish Council considers that the application relies too heavily upon:

- assessments of the site in isolation;
- future approvals and consents;
- future planting and habitat establishment;
- management arrangements that are not yet fully defined;
- off-site biodiversity provision that has not been identified;
- assumptions derived from earlier development;

- the absence of clear evidence that existing public transport would provide a realistic alternative to private-car use;
- the assumption that protected species impacts can be adequately addressed through later mitigation;
- ground and drainage assumptions that require further verification;
- a planning case that has not demonstrated why development of this greenfield site should be preferred over previously developed land;

- and mitigation measures whose long-term effectiveness has not been demonstrated.

Taken together, these matters give rise to substantial uncertainty regarding the environmental, infrastructural and residential effects of the development.

Trowell Parish Council therefore concludes that the applicant has not demonstrated that the proposal represents an acceptable form of development and that the identified harms have not been satisfactorily avoided, mitigated or outweighed.

For those reasons, the Council formally objects to Planning Application **26/00427/FUL**.

3. Flood Risk and Cumulative Impact upon the Boundary Brook Catchment

3.1 Applicant's position

The applicant's Flood Risk Assessment identifies the application site as being within Flood Zone 1 and therefore at low risk of fluvial flooding.

The applicant proposes to manage surface water through a combination of restricted discharge, attenuation storage and sustainable drainage measures. The submitted material concludes that the development can be delivered without increasing flood risk elsewhere, subject to the implementation and maintenance of the proposed drainage strategy.

3.2 Parish Council assessment

The Parish Council does not dispute the mapped Flood Zone 1 classification. However, that classification relates principally to the probability of fluvial flooding affecting the site itself and does not resolve the wider concern regarding the effect of development upon downstream areas.

The central concern raised by the Parish Council and residents is not simply whether the proposed dwellings would be flooded. It is whether the conversion of undeveloped and permeable land into housing, roads, parking and other hard surfaces could contribute to increased surface-water volumes, altered flow pathways or greater pressure upon the Boundary Brook catchment.

Residents reported repeated downstream flooding affecting homes and roads in Trowell. The Council heard evidence of flooding and serious near-miss events arising after successive development within the surrounding area.

The Parish Council considers that those experiences require the proposed development to be assessed in the context of the whole catchment and not solely through the red-line boundary of this application.

The submitted Flood Risk Assessment addresses the drainage performance of the proposed site. However, the Council has not identified a comprehensive catchment-wide assessment examining the combined effect of:

- the different phases of the Field Farm development;
- Hulks Farm;
- the approved cricket facilities and car parking;
- this proposed development;

- other built development within the catchment;
- and changing rainfall and climate conditions.

The Council considers that a site-specific calculation demonstrating restricted discharge from one development does not establish that the cumulative impact of several developments upon the same receiving watercourse is acceptable.

The applicant's documents also identify medium groundwater flood risk. The Parish Council considers that the interaction between groundwater conditions, slowly permeable soils, surface-water runoff, existing watercourses and downstream drainage infrastructure requires greater scrutiny.

3.3 Council conclusion

The Parish Council is not satisfied that the submitted evidence demonstrates that the cumulative effect of development within the Boundary Brook catchment has been adequately assessed.

The Council therefore requests that planning permission is refused unless and until an independent catchment-wide cumulative flood-risk assessment demonstrates that the proposal would not:

- increase flood risk elsewhere;
- increase the rate, volume or duration of downstream flows;
- reduce the effectiveness of existing flood-management measures;
- constrain future flood-alleviation opportunities;
- or place additional pressure upon properties and infrastructure already affected by flooding.

The assessment should reflect existing development, approved development, current catchment conditions and appropriate climate-change allowances.

4. Protected Species, Habitats and Ecological Connectivity

4.1 Parish Council assessment

The Parish Council notes that the application is supported by ecological and Biodiversity Net Gain material. However, Members raised specific concern about the effect of the development on birds, bats and species associated with the site's ditches and the wider Boundary Brook corridor. The Council is not in a position to assert the presence of any particular protected species beyond the submitted evidence, but considers that the potential for protected species and their habitats must be addressed expressly and comprehensively.

The development would replace a substantial area of existing grassland and would alter scrub, hedgerows, trees and drainage features. These habitats may perform different functions, including nesting, foraging, shelter and movement between the site, Boundary Brook and the wider countryside. A statutory Biodiversity Net Gain calculation does not replace the need to comply with species-protection legislation or to avoid and mitigate harm to protected species.

4.2 Council conclusion

The Parish Council requests that the Local Planning Authority is satisfied that the ecological surveys are complete and seasonally appropriate; that the potential effects on birds, bats and protected riparian species have been properly assessed; that lighting, construction and drainage proposals will not sever or degrade ecological corridors; and that all necessary avoidance, mitigation, monitoring and long-term management measures are secured before development commences.

5. Ground Conditions, Made Ground and Construction Suitability

5.1 Parish Council assessment

Members raised concern that parts of the application site may comprise made or previously disturbed ground. The Parish Council does not present this as a confirmed technical conclusion. However, where made ground is present, its composition, depth and compaction can be relevant to infiltration, surface-water movement, settlement, foundation design and the long-term performance of drainage infrastructure.

The proposed drainage strategy already states that infiltration is not feasible and relies on attenuation, flow controls and discharge to the existing ditch network. The Council therefore considers that the assumptions used in the drainage and construction design should be reconciled with a sufficiently detailed investigation of actual ground conditions.

5.2 Council conclusion

The Parish Council requests confirmation that adequate intrusive ground investigation has been undertaken to define the extent and characteristics of any made ground, contamination or variable compaction; that the findings have informed the drainage calculations and foundation strategy; and that any necessary remediation, verification and construction controls can be secured.

6. Development Plan, Greenfield Land and Alternative Land Supply

6.1 Parish Council assessment

The Parish Council considers that the proposal would result in the permanent development of an undeveloped Green Belt field which is not understood to be allocated for housing in the adopted development plan. The Council does not seek to identify or promote a particular alternative site through this representation. However, it considers that the Local Planning Authority must be satisfied that the proposal accords with the spatial strategy and that the release of this greenfield land is justified when previously developed land is generally expected to be prioritised where suitable and available.

The remaining open land should not be disregarded merely because the physical gap between settlements has already been reduced by earlier development. The Council considers that the site continues to perform an important function in maintaining openness, defining the settlement edge and preserving the separate identity of Trowell.

6.2 Council conclusion

The Parish Council requests that the application is assessed rigorously against the adopted development plan and current national policy, including the status of the site, the availability of a policy-compliant basis for its release, the preference for previously developed land and the cumulative erosion of the remaining Green Belt boundary between Trowell and Stapleford.

7. Public Transport and Sustainable Accessibility

7.1 Parish Council assessment

The application documentation relies upon the proximity of existing bus stops and walking and cycling links to support the conclusion that the site is sustainably located.

The Parish Council does not consider that proximity alone demonstrates adequate public transport provision. Members raised concern that the services presently available would not provide a sufficiently frequent, convenient or comprehensive option for the everyday journeys likely to be made by residents of the proposed development.

The Council considers that the assessment should address:

- the frequency and operating hours of existing services;
- the range of destinations served;
- access to employment, healthcare, education and essential services;
- evening and weekend provision;
- the accessibility and safety of routes to and from bus stops;
- the cumulative demand arising from existing, approved and proposed development; and
- whether the development would be likely to remain substantially dependent upon private vehicles.

The provision of electric-vehicle charging points and cycle storage does not overcome inadequate public transport provision or establish that all future residents would have a realistic alternative to car ownership and use.

7.2 Council conclusion

The Parish Council is not satisfied that the submitted evidence demonstrates that the development would be adequately served by public transport or that it would achieve the claimed level of sustainable accessibility.

The Council requests that the Local Planning Authority obtains a detailed assessment of existing service frequency, capacity, operating hours and destinations, together with confirmation of any improvements or financial contributions necessary to provide a practical and reliable public transport option for future residents.

8. Community Health and Wellbeing

8.1 Parish Council assessment

The Health Impact Assessment identifies proposed open space, play facilities and walking links as positive effects. The Parish Council has considered those claims but does not accept that they provide a complete assessment of the health consequences for the existing community.

The loss of an existing open field, the further urbanisation of the approach into Trowell, construction disturbance, additional traffic and pressure on already constrained local services may affect both physical and mental wellbeing. The Council considers that these effects must

be assessed cumulatively alongside recent and approved development rather than treating the proposed on-site facilities as sufficient compensation.

The assessment also confirms a potential increase of approximately 138 residents but does not demonstrate that GP, dental, school and other local services have capacity. A possible future financial contribution does not itself establish that the necessary provision will be available when required.

8.2 Council conclusion

The Parish Council requests a balanced health and infrastructure assessment that addresses adverse as well as beneficial effects, demonstrates the capacity of local services and identifies enforceable mitigation. The Council is not satisfied that the submitted checklist-style assessment establishes that the proposal would avoid harm to the health and wellbeing of the existing community.