



**Broxtowe
Borough
COUNCIL**

**CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD
PLAN**

**SUMMARY OF CONSULTATION RESPONSES RECEIVED BY THE
LOCAL PLANNING AUTHORITY TO THE
REGULATION 16 CONSULTATION
TO MEET THE REQUIREMENTS OF
REGULATION 4 OF THE
THE NEIGHBOURHOOD PLANNING (REFERENDUMS)
REGULATIONS 2012 (AS AMENDED)**

BROXTOWE BOROUGH COUNCIL

MARCH 2024

1. Introduction

- 1.1 In accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended), Broxtowe Borough Council consulted upon the draft Chetwynd: The Toton and Chilwell Neighbourhood Plan between Wednesday 8th June and Friday 5th August 2022 (the minimum six-week consultation period was extended by two weeks).
- 1.2 The Chetwynd: The Toton and Chilwell Neighbourhood Plan and other supporting documents are available to view on the Borough Council's website at <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/neighbourhood-planning/chetwynd-the-toton-and-chilwell-neighbourhood-plan/>.
- 1.3 This document provides a summary of the representations submitted to the independent examiner, in order to meet the requirements of Regulation 4 the Neighbourhood Planning (Referendums) Regulations 2012 (as amended).
- 1.4 Due to the number and extent of the representations received and forwarded to the Independent Examiner, only a brief summary of the representations received is included within this document.
- 1.5 Redacted copies of all of the representations received to the Regulation 16 consultation can be viewed on the Borough Council's website at the following link: <https://www.broxtowe.gov.uk/media/9829/combined-redacted-reps-wv.pdf>.
- 1.6 As the Independent Examination included a public hearing, which took place on Thursday 10 November 2022, Pre-Hearing Statements can also be viewed on the Borough Council's website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/neighbourhood-planning/chetwynd-the-toton-and-chilwell-neighbourhood-plan/>. All Pre-Hearing Statements were forwarded to the Independent Examiner.
- 1.7 An additional consultation was undertaken by the Borough Council during the Independent Examination in the summer of 2023, seeking comments on the potential proposed modifications to the Neighbourhood Plan and Policies Map during a four-week period which ended on Friday 25th August 2023. All responses received were forwarded to the Independent Examiner. The representations to this consultation are available at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/neighbourhood-planning/chetwynd-the-toton-and-chilwell-neighbourhood-plan/>.

2. Representations Received

2.1 Broxtowe Borough Council received 114 responses to the Regulation 16 Consultation of the Chetwynd: The Toton and Chilwell Neighbourhood Plan, including some 25 responses from statutory consultees, local community groups, businesses, landowners and their agents. These representations were forwarded to the Independent Examiner. Seven Hearing Statements were received in advance of the public hearing. Eight responses were received to the additional consultation which ended on Friday 25 August 2023.

Representations Received to the Regulation 16 Consultation

2.2 Below is a summary of the responses received to this consultation from statutory consultees and other organisations and stakeholders. Details of one more substantial response from a member of the public is also summarised within this table. A summary of comments received from other members of the public can be found later in this document.

RESPONDENT	SUPPORT / OBJECT / COMMENTS	ASKED TO BE NOTIFIED OF DECISION IN RELATION TO NP
Broxtowe Borough Council	<p>The Borough Council made a number of comments including:</p> <ul style="list-style-type: none"> • Recommending policy wordings be reconsidered to avoid unintended consequences. • Concerns relating to the viability / deliverability of the Toton Strategic Location for Growth and Chetwynd Barracks sites, due to the number and potential cost of policy requirements. • Concern in relation to some of the terms used, for example 'any development' and recommending making these more specific. • Concerns that the justification text for some policies appeared to contain additional policy requirements. • That the responsibility for the delivery of the policies should be 	N/A

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	<p>clarified (i.e. which organisation would be responsible for delivery).</p> <ul style="list-style-type: none"> • Concern that some policies would be outside of the control of the LPA and the Chetwynd: The Toton and Chilwell Neighbourhood Forum [Later referred to in this document as either the 'Neighbourhood Forum' or simply as the 'Forum']. • Recommending that some policies should be re-worded as 'aspirations'. • Recommending that some documents (e.g. master plans) should be further clarified – in terms of which documents / plans apply. • Seeking clarification as to whether the Neighbourhood Forum was seeking to amend Green Belt boundaries to allocate some land to the north east of the Neighbourhood Area (for example, within Policies LHC04 and LHC06). Seeking clarification that the appropriate consultations had been undertaken. • Seeking clarification that the Strategic Environmental Assessment (SEA), produced following the Borough Council's conclusion that an SEA would be required (a view supported by Natural England), was sufficient to meet the basic conditions. • Confirmation whether Annington Homes (as a major landowner of land at Chetwynd Barracks) had responded to the Regulation 14 or other public consultations. • Seeking confirmation that all background documents (including master plans) had been made available / shared with the LPA. • Recommending to the Independent Examiner that a public hearing would be necessary to allow all 	

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	<p>parties a 'fair chance' to put their case.</p> <ul style="list-style-type: none"> • The Borough Council made specific comments in relation to the following policies: ENV01 (including advising that additional Local Green Space designations could only be added during a formal review of the Plan), ENV02, ENV03, ENV04, ENV05, ENV06, ENV07, ENV08, INF01, INF02, INF03, INF04, INF05, INF06, INF07, INF08, INF09, HAS01, HAS02, HAS06, HAS07, URB01, URB03, URB05, LHC01, LHC02, LHC04, LHC05, LHC06, LHC08, EMP01, EMP02, EMP03, EMP04, and EMP05. • Many of the specific comments related to seeking clarifications in relation to policy wording and / or recommending amendments to make policies clearer and / or noting concerns about deliverability or viability (an example included the retention and re-purposing of Building 157 on the Chetwynd Barracks site) and / or seeking confirmation as to who the policies were aimed at and / or which organisations would be responsible for their delivery, and / or how the infrastructure proposed by some policies would be funded. • Some of the specific comments related to what might appear to be additional policy requirements within the justification text for some policies or recommending that some parts of the justification text should be re-worded as 'aspirations'. • A number of the comments related to recommendations for changes to policies following the Integrated Rail Plan decision not to proceed with an HS2 station at Toton. 	

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	<ul style="list-style-type: none"> • Specific comments also sought to clarify the areas / sites which some of the policies applied to. • Some specific comments recommended defining some 'key terms'. • Specific comments were made in relation to the potential 'enforceability' of some policies. • Advice was provided that some decisions would need to be taken through the Greater Nottingham Strategic Plan process (the review of Part 1 of the Local Plan – the Aligned Core Strategy). • Seeking clarification in relation to the similarity of the wording of some policies (e.g. LHC01 and EMP05). • Seeking clarification in relation to the wording of some policies where the responsibility for delivery would normally rest with external organisations, such as Nottinghamshire County Council. 	
Environment Agency	<ul style="list-style-type: none"> • The Environment Agency's comments noted that the Neighbourhood Plan highlighted aspirations for the East Midlands Hub Station to be linked to the innovation centre while also providing 'significant residential quarters'. The Environment Agency noted that a large portion of the area designated for potential housing falls with flood zone 3b and as such, residential development which is classified as 'more vulnerable' would not be suitable in this location. • Comments noted that while the site was linked to the proposed innovation centre, the hub station does fall outside of the indicative Neighbourhood Plan boundary. 	N/A

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	<ul style="list-style-type: none"> • In December 2021 the Environment Agency issued a response to a request for comments on the Toton and Chetwynd Supplementary Planning Document (SPD). These comments were repeated. • Comments noted that the proposed development of Chetwynd Barracks is located fully within Flood Zone 1 and lies outside of the modelled breach events. Given the previous use of the site as an army barracks there is a possibility that land contamination may be present. • Comments noted that the site is situated on a secondary aquifer and care needs to be taken to protect the groundwater resource. Given Chetwynd's current and previous use, future development will need to demonstrate that contamination risks will be adequately addressed through the course of the development. • They welcomed that the document highlights the opportunity to provide Biodiversity Net Gain. Comments noted that the Environment Bill [had] now been approved through parliament requiring development to provide a minimum of 10% Biodiversity Net Gain. Given the size of the proposed development areas they encouraged the Neighbourhood Plan to push for developers to provide Biodiversity Net Gain in excess of the required 10% across these sites where possible / feasible. • They welcomed that there were policies to enhance or protect green infrastructure but recommended that they be expanded to also cover blue infrastructure. • They were pleased to see a reference within Policy HAS06 	

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	<p>which highlighted a requirement for new residential development to meet the tighter water efficiency measures of 110 litres per day, unless it can be demonstrated that this is not feasible.</p>	
Historic England	<ul style="list-style-type: none"> • General advice provided only 	N/A
Annington Homes	<ul style="list-style-type: none"> • Information was provided in relation to the parts of the Chetwynd Barracks [later referred to in this document as the 'Barracks'] site that Annington Homes owns (Married Quarter Estates) and legal information. • They noted that if, and until, such time that the Ministry of Defence [MoD] advise the Married Quarters Estate is no longer needed by the MoD, then they cannot deliver any of the Annington sites as part of the proposals for the Barracks site. Equally, neither can the MoD deliver the Married Quarters Estates sites for development. However, should the MoD release the sites to Annington, then they would work with the MoD and the Council to deliver on the principles of the draft Neighbourhood Plan of which they are supportive, including the provision of 1,500 new homes. • They note that, typically, where Married Quarter Estates are no longer required by the MoD, their focus at Annington is on: 1. Enhancing the existing homes by reviewing building layouts and parking and enhancing sustainability credentials to provide good quality homes. On the ground, the result can be on-plot parking replacing remote garage blocks, on plot electric charging points for residents, enhanced EPC ratings for housing and layout changes with gardens that better relate to the 	Yes

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	houses they serve. 2. Where viable development opportunities exist, providing additional new residential properties making best uses of sustainably located previously developed sites within built-up areas. Building on old garage blocks is typical.	
Beeston and District Civic Society	<ul style="list-style-type: none"> • They previously responded to the first draft plan and provided detailed information about cycling and walking. They noted that plan modifications seemed to answer many of the key concerns they may have had in the past. • They commented that they thought this is to be a very good document which could create the right sort of aspirational picture for the future/new garden village whilst preserving heritage buildings and sites. • They complimented the Neighbourhood Forum and their volunteers for the sterling work that they have done over a protracted and uncertain period of time and Broxtowe Borough Council for the support they have given in getting funding and making progress. • The Civic Society strongly agreed with the Government Planning Practice Guidance that 'Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area'. • They noted that there is a good rationale for such a plan in Toton and Chilwell with all the planned developments on the land around the area and the Chetwynd Barracks closure. 	No Response.

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	<ul style="list-style-type: none"> • They noted that an insight into the planning consequences of the Government decision on 18 November 2021 to abandon Toton as the East Midlands HS2 hub is essential and useful background in responding to the Local Plan consultation. However, they noted that it must be of great concern that the Government’s HS2 decision and the accompanying Masterplan are being developed on ‘shifting sands’ – ‘as a result the Forum and Council are clearly trying to make progress which is very uncertain even now’. They noted that ‘the reality is that both the Neighbourhood Plan and the separate Master Plan have been heavily overtaken by events now that Toton is no longer the preferred HS2 East Midlands destination and the MoD will not leave Chetwynd before 2026’. • They commented that it was good that heritage buildings and sites were identified for reuse and close attention was being paid to blue, green and sustainable travel infrastructure. • They noted that the core objectives were sound although those on transport seem very car focused and something ‘extreme’ needs to be done to encourage cycling and walking for health and environmental reasons within and outside the Forum area. They noted that the quality of cycling infrastructure within and outside of the area was very poor and needed to be developed by the County Council to provide a high-quality cycle network between the Neighbourhood Plan area and local employment sites within 5 miles, 	

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	<p>regardless of barriers such as the River Trent and Canal.</p> <ul style="list-style-type: none"> • They noted that more attention to detail relating to walking and cycling was needed and infrastructure needs to meet the latest cycle infrastructure standards. • They were supportive of the objectives and aspirations within the Plan. • They noted that proposals for local energy generation and efficiency and water reuse were excellent. • They made observations about the availability of printed documents in the Council's Reception. 	
<p>Bloor Homes – Oxalis</p>	<ul style="list-style-type: none"> • They are promoting land within the north of the Plan Area, currently within the Green Belt. Further details and plans showing this area were included within their submission. • They noted that notwithstanding the proposed HS2 changes affecting Toton within the IRP, it was clear that Toton remains 'a focus for growth and investment'. Indeed, they noted that the IRP proposes to accelerate investment in the area much sooner than previously planned which will bring opportunities for growth and regeneration. • They recommended that the Neighbourhood Plan should reference the IRP within the document as it provides the continued setting for supporting wider investment and growth in Toton, notwithstanding the current uncertainties surrounding HS2. • They noted their support for a number of key principles and acknowledges the corresponding Figures 9.1, 9.2 and 9.3 which 	<p>Yes</p>

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	<p>indicatively demonstrate how these principles could be delivered. The importance of green corridors (Policy ENV03), footpath connections (Policy INF03) and a new road (Policy INF02) in delivering the vision, all of which run through land to the north of the tram line, are particularly noted in respect of the land interests of Bloor Homes.</p> <ul style="list-style-type: none"> • They noted that, notwithstanding the general support for the key principles referred to, they were of the view that it was also vital that policies within the Neighbourhood Plan did not prevent development from coming forward through measures and ambitions which are unduly restrictive or have uncertainty in how they can be delivered. They considered this to be the case with Policy ENV03 which should not state a required width for the green corridors within the justification, as these would be established through a master planning process for the site which considers landscaping, ecology, accessibility and housing delivery. • They recommended that the Policy [ENV03] should therefore be amended to remove the stated widths and allow this to come forward through the master planning process. • They noted their support for the principle of new development north of the tram line, particularly within the context of new infrastructure which is proposed to be delivered from the A52. However, they considered that the Neighbourhood Plan should be more positive about the potential for development north of the tram line and should advocate for a more comprehensive approach 	

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	<p>that would also include more housing and accessible open space to meet the needs of the community.</p> <ul style="list-style-type: none"> • They also highlighted differences between the Neighbourhood Plan and the Toton and Chetwynd Barracks Supplementary Planning Document (SPD) (October 2021) [Also referred to later within this document as either the 'Strategic Masterplan SPD' or just as the 'SPD'] which would provide a confusing setting for development coming forward within the Toton area. • They stressed that it is important that the Neighbourhood Plan and SPD are more closely aligned to avoid complications in bringing development forward with two different plans covering the same area. • They considered that the aims and objectives of the community would be significantly better achieved with a more comprehensive approach to the Toton area, including land to the east of Toton Lane and north of the tram line, rather than a constrained site limited to the confines of the Toton Strategic Location for Growth site area (as set out in Local Plan Policy 3.2). • They considered that additional land would deliver: Significantly more strategic green infrastructure and accessible recreation space; Enhanced opportunities for Biodiversity Net Gain; Essential highways infrastructure connecting the Toton and Chetwynd Barracks sites; Green links through the site for pedestrians and cyclists which help to improve connectivity for the community through Toton and Chetwynd, including for residents of 	

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	<p>Stapleford, Bramcote and Chilwell; Extensive green space, including the potential to create a Community Park on the northern part of the site; and, a significant number of sustainable new houses to meet the needs of the Borough and the community.</p>	
<p>British Horse Society</p>	<ul style="list-style-type: none"> • They provided information in relation to the British Horse Society and statistics in relation to incidents involving horses – including accidents and injuries on highways. • They noted that DEFRA has recorded a population of 514 horses just in the immediate NG9 postcode area (2021). • They noted that the Plan is misleading in the subheading ‘footpaths and cycle ways’ as the public rights of way mentioned are footpaths and bridleways (Beeston BW27, BW28, BW21). They noted that protecting these routes for all users to access the network beyond the neighbourhood area is vital, and opportunities to extend the network should be inclusive of equestrian access. • They noted that upgrading routes to continue connections e.g. Beeston FP17 should be advocated. They noted that they work collaboratively with organisations such as Sustrans to establish successful shared routes. • They noted that the language used in the Neighbourhood Plan should therefore be revised to reflect the multi-user routes to provide for all vulnerable road users. • Likewise, they noted that the leisure facilities and green corridors described could include equestrian access around the perimeter of or through open spaces where this 	<p>Yes</p>

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	<p>could reduce the need for equestrians to use the roads in order to reach the PRow [Public Right of Way] network.</p> <ul style="list-style-type: none"> • They noted that active travel does include equestrians. They advised that: Jesse Norman in House of Commons debate on Road Safety, 5 November 2018 noted “<i>We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders</i>”. • They noted that, according to BETA, two-thirds of equestrians are women and Church et al (2010) found 37% of women who are horse riders are over 45 years of age and over a third would pursue no other physical activity. They noted that the Nottingham City ROWIP recognises the health and wellbeing benefits of horse riding and noted that the Council could use this as an opportunity to enhance rather than fragment safe access. 	
DB Cargo – First Plan	<ul style="list-style-type: none"> • They included an accompanying covering letter and also made comments on behalf of DB Cargo which suggested areas where the Neighbourhood Plan should be amended. • In relation to Figures 6.2 / 10.1 / Images on Title Pages of Sections B and C, they noted that these figures provided diagrams indicating that land to the west of the railway line outside the neighbourhood plan area will be redeveloped for other uses (HS2 Station / Housing etc.). They noted that, as stated in the letter accompanying their response form, DB Cargo was committed to their site and operations, which are 	Yes

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	<p>expected to continue for the foreseeable future.</p> <ul style="list-style-type: none"> • They noted that, following publication of the Integrated Rail Plan for the North and Midlands in March 2022, it is no longer proposed to provide a HS2 Hub Station at Toton, with this proposed to be relocated to East Midlands Parkway. • They suggested that these Figures should be updated and references to development outside the Neighbourhood Plan area be removed. • In relation to Section 9. The Vision for the Neighbourhood Area; Achieving the Vision (Page 40, Paragraph 9.6), they noted that this section detailed the vision for the 'Commercial / Innovation Campus (Blue Zone)' which in particular noted that the prime focus was for commercial development. • They noted that they were concerned that there is a lack of reference to amenity issues. They stated that there was no consideration of the existing rail related operations which are being undertaken on the opposite side of the railway line in relation to any new potentially-sensitive (residential) uses coming forward as supported by the Neighbourhood Plan. • They suggested the wording for bullet point 2 under the heading 'Commercial / Innovation Campus (Blue Zone)' should be amended. • They noted that Paragraph 10.49 details objectives and guidelines for masterplans being developed for and within the Neighbourhood Plan area and that they were concerned that there was no reference to 	

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	<p>consideration of amenity issues within the points listed. They suggested that an additional bullet point be included as follows:’</p> <ul style="list-style-type: none"> • Ensures that any new residential or other noise sensitive development would have an acceptable level of amenity given existing neighbouring uses (e.g. rail line and associated railway uses / operations). • In relation to Policy URB05 (Page 76), they were again concerned that there is no reference to issues of amenity. • They were of the view that similar text [to paragraph 182 of the NPPF] should be included alongside Policy URB 05 to ensure that in progressing detailed proposals, issues of amenity are considered centrally and at the outset. 	
<p>Derbyshire County Council</p>	<ul style="list-style-type: none"> • They noted that they considered that the Neighbourhood Plan’s objectives and policies are in general conformity with the strategic policies contained within the Broxtowe Aligned Core Strategy and the Broxtowe Local Plan Part 2, which were largely supported by Derbyshire County Council in its consultations on both Plans. • They noted that much of the footprint of the Neighbourhood Plan lies largely within the site of the Toton and Chetwynd Barracks Strategic Masterplan, which was the subject of a previous consultation. They included their previous response to this consultation from 2020. • They noted that, as far as Derbyshire’s transport networks are concerned, many of the wider transportation and access related 	<p>Yes</p>

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	<p>considerations are broadly similar to those raised by the Strategic Masterplan, notably the inherent uncertainties surrounding the future of (the proposed) Toton Station, access to HS2 and more generally, aspirations for the station to form an access hub to wider destinations by a variety of sustainable modes of transport. They noted that, notwithstanding the cancellation of the HS2 hub station at Toton, their highways and accessibility comments remain broadly as per their 2020 response.</p> <ul style="list-style-type: none"> • From a public transport perspective, they noted that much of this plan still refers to the HS2 hub station at Toton. However, they noted that this was effectively cancelled last year as part of the Integrated Rail Plan for the North and Midlands [IRP]. They suggested that the Neighbourhood Plan should recognise this change, as at best, Toton is only likely to get a new local rail station, even if this is uncertain at the moment. • They welcomed the fact that an external Strategic Environmental Assessment [SEA] on behalf of the Neighbourhood Forum had been conducted. They suggested that this clearly detailed key impact areas that they would expect to be identified in a Neighbourhood Plan. They suggested that reference should be made to this more widely in the Neighbourhood Plan as a running theme. • Within the document, they welcomed the reference to the mitigation of climate change in relation to the construction of dwellings (paragraph 7.26). They noted that this reference was built 	

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	<p>upon (pages 72/73) with the suggestion of low-carbon technologies and by referring to BREEAM, the suite of validation and certification systems for a sustainable built environment. They suggested consulting other organisations, such as the UK Green Building Council, to amplify these ideas. These references are focused on the construction of new buildings, which in themselves have a large carbon footprint. However, they suggested that these requirements should not simply be limited to new dwellings but should also be extended to existing buildings requiring extensions or retrofitting.</p> <ul style="list-style-type: none"> • They suggested that outside urban areas a 'Dark Skies' policy should be added to ensure that the impact of light pollution from artificial, externally visible light sources would be limited. Light pollution adversely affects wildlife, and they suggested a policy such that any proposals to install lighting in parts of the area that are currently dark at night would be resisted, unless it could be demonstrated that such proposals are essential for road and/or pedestrian safety. 	
Ministry of Defence [MoD] / Defence Infrastructure Organisation [DIO]	<ul style="list-style-type: none"> • Their response included general information in relation to safeguarding and their role. • They noted that the area of the Toton and Chilwell Neighbourhood Plan encompasses areas within the Statutory Birdstrike Safeguarding Zone surrounding the aerodrome. RAF Syerston lies approximately 23km North-East of the area of the Neighbourhood Plan. 	N/A

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	<ul style="list-style-type: none"> • They noted that the Neighbourhood Plan contains references within the guidelines and aspirations section which identified guidelines for development. They noted that provisions, which make clear to developers that applications for development would not be supported, where they would be detrimental to defence interests, would be welcomed in any future policy wording. • In summary, they noted that the MoD would wish to be consulted in relation to the Neighbourhood Plan of any development which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation. • They also referred to an email from Annington Homes. 	
East Midlands Development Company	<ul style="list-style-type: none"> • They provided an introduction to the East Midlands Development Company and their role in development and the process. • They stressed that the Neighbourhood Plan should be aligned with the Toton and Chetwynd Barracks Strategic Masterplan SPD. • They noted that whilst the Neighbourhood Plan does make reference to the Strategic Masterplan process, this is not until page 46, and no reference is made to it being an SPD nor to what this means in practice. • They recommended that the Neighbourhood Plan should be amended to make its relationship with the Broxtowe Part 2 Local Plan [P2LP] and subsequent SPD much clearer. They requested that the Neighbourhood Plan include the 	Yes

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	<p>SPD's Spatial Framework Plan (Figure 26).</p> <ul style="list-style-type: none"> • They suggested that, to reflect the requirements of the Part 2 Local Plan (and accord with basic condition 'e'), the Neighbourhood Plan should set out the distinction between different scales of planning within the area: Instead of an 'overarching masterplan', they suggested that the Neighbourhood Plan should refer specifically to the Strategic Masterplan SPD. • They considered that the term, 'secondary masterplan', (and the matters required of this at Chetwynd Barracks), might need further clarification or consideration so as not to raise undue ambiguity. • In relation to Green infrastructure and movement infrastructure diagrams (Figures 9.1, 9.2 and 9.3), they considered that these three diagrams are notably different to the Green Infrastructure Framework Plan (Figure 22) and Movement Framework Plan (Figure 24) set out within the Strategic Masterplan SPD and noted that the inclusion of alternative networks in the Neighbourhood Plan would create uncertainty and ambiguity for developers, residents, and other stakeholders. • They considered that the Neighbourhood Plan should include or refer to Figures 22 and 24 of the SPD as the basis for future green infrastructure and movement networks within the parts of the Neighbourhood Plan area which are covered by the Strategic Masterplan. They considered that it would be appropriate for the Neighbourhood Plan to add further detail beyond that set out in the 	

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	<p>SPD if desired, and noted that they would be pleased to support the Neighbourhood Forum in undertaking such an exercise.</p> <ul style="list-style-type: none"> • In relation to the relocation of George Spencer Academy, (Paragraph 9.6, Figure 9.5, and Figure 10.1), they noted that they were aware of the Neighbourhood Forum’s long-standing aspiration to secure the expansion and relocation of the George Spencer Academy, which currently straddles the A52 (partly within and partly outside of the Neighbourhood Plan area) and noted that this is a matter which has been considered at length as part of the strategic masterplan process, including significant consultation and engagement with Nottinghamshire County Council as local education authority and the George Spencer Academy Trust. They noted that it has not been possible to establish at the present time whether any additional secondary school provision is necessary. • They noted that Figure 10.1 shows a green shaded ‘development zone’ within which a relocated school and other community uses could be located and noted that this extends beyond the current allocated site boundaries in the Part 2 Local Plan, and into the Green Belt. • They suggested that the Neighbourhood Plan should adopt the same flexibility about options for future secondary education provision as the SPD. • They considered that Policy ENV03 did not meet basic condition ‘e’. • They considered that whilst Policy ENV4 did not reflect the existence of other forms of green infrastructure 	

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	<p>at Chetwynd Barracks, it still sought to achieve a similarly large extent of green corridor provision as Policy ENV03 at Toton. As currently drafted, they considered that these policies were likely to make it impossible for the development quantum set out in the Part 2 Local Plan to be delivered.</p> <ul style="list-style-type: none"> • They recommended that Policies ENV03 and ENV04 should be amended to ensure consistency with the general approach to green infrastructure provision set out in the Part 2 Local Plan and SPD. • They strongly supported the emphasis that the Neighbourhood Plan placed on the provision of the right infrastructure to support development. • They were unclear what role Policy INF01 of the Neighbourhood Plan would have. They suggested that it may be beneficial for the policy to be amended to make clear that it is the detailed masterplan to be produced by the developer of Chetwynd Barracks to which the policy applies. Otherwise, to avoid confusion and a lack of conformity with the Part 2 Local Plan, they suggested that this policy should be deleted. • They noted that the Neighbourhood Plan included various references to the proposed East Midlands Hub HS2 Station at Toton, which was not included in the Government's Integrated Rail Plan (IRP) in autumn 2021. Whilst the implications of the IRP are still being understood, they suggested that the Neighbourhood Plan would need to respond to this change in context. • They noted their strong support for the Neighbourhood Forum's positive 	

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	<p>vision for the future development of Toton and Chetwynd Barracks.</p> <ul style="list-style-type: none"> • Subject to amendments being made to address the limited number of strategic-level conflicts with the Part 2 Local Plan and SPD set out within their representations, they considered that the Neighbourhood Plan would provide a strong basis for the area's future development. • They considered it necessary to hold hearings as part of the Neighbourhood Plan's examination to allow issues to be adequately considered. 	
Erewash Borough Council	<ul style="list-style-type: none"> • They noted that they had no further comments at this stage. 	N/A
Homes England / Defence Infrastructure Organisation [DIO] submitted by Avison Young	<ul style="list-style-type: none"> • Avison Young (on behalf of Homes England and the DIO) provided 47 pages of representations to the Regulation 16 consultation. • They noted that they were instructed by Homes England to provide planning advice in respect of the redevelopment of Chetwynd Barracks [the 'Barracks'] and that Homes England had entered into a partnering agreement with the Defence Infrastructure Organisation (DIO), an executive agency within the Ministry of Defence (MoD) for which the Secretary of State for Defence has responsibility. • Avison Young noted that their instructions were to prepare an outline planning application for the redevelopment of the Barracks, and to engage with the preparation of planning policy documents that affect the Barracks. • Avison Young noted that their representations to the Regulation 16 draft Neighbourhood Plan were submitted on behalf of Homes England, and with the input and 	Yes

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	<p>agreement of the DIO. They were submitted having regard to the position that Homes England and the DIO had reached in respect of the gathering of evidence to support the preparation of an outline planning application for the site, and to the need for the Neighbourhood Plan to be in general conformity with the 'Strategic Policies' of the Local Plan, if the 'basic conditions' were to be met.</p> <ul style="list-style-type: none"> • They noted that they (Homes England and the DIO) continued to express the overall support for the Neighbourhood Plan process that they expressed at the Regulation 14 stage and that they continued to support the overall vision, and the residential-led redevelopment of the Barracks, with there being a good deal of common ground between Homes England/DIO and the Forum. • They were pleased to note the adjustments that had been made to the structure of the Neighbourhood Plan, and to a range of policies and supporting text since the Regulation 14 draft Plan which, in many cases, had resolved or lessened their concerns. Nevertheless, they considered that there were some areas that remained of concern and which they considered raise matters of compliance with two of the Basic Conditions; namely: Basic Condition (a) and the Plan's compliance with national policy and advice contained in guidance issued by the Secretary of State (and in particular whether, as is required by para 13 of the NPPF, the Neighbourhood Plan supports the delivery of Strategic Policies in the Local Plan); and Basic Condition (e) and whether the 	

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	<p>Neighbourhood Plan is in general conformity with the Strategic Policies contained in the Local Plan for the area.</p> <ul style="list-style-type: none"> • They provided some background information to the site and outline planning application as well as the partnering agreement between Homes England and the DIO as well as site survey work and other site investigations undertaken and that were in progress. • They also referred to ongoing discussions and meetings. • They raised concerns about the Annington Homes land and essentially whether it would be possible for a new road to cross this land, which they noted is outside of their control. They also referred to other areas of land outside of their control. • They referred to concerns in relation to viability of the development site. • They stressed that all policies in Plans should, according to paragraph 31 of the NPPF “be underpinned by relevant and up to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”. • However, they accepted that Neighbourhood Planning groups might not have access to similar levels of resource as LPAs, and that they might not be able to gain access to sites to carry out surveys, or, as they considered to be case, the evidence base relating to a site or to a general policy matter might simply not be complete. They noted that whilst the absence of evidence does not of itself lead to a failure 	

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	<p>against the basic conditions, the absence of evidence is relevant when considering the appropriateness of policies that prescribe, rather than advocate, outcomes on an allocated site, when those outcomes can only be determined with the necessary evidence in place. They considered that if those policies go beyond the content of the Strategic Policies in the Development Plan, by seeking different and additional outcomes, and without an evidential basis for doing so, there is a significant risk that the policies will not be in general conformity with those Strategic Policies.</p> <ul style="list-style-type: none"> • They noted that since the Forum submitted the Regulation 16 draft Plan, the government has published the Integrated Rail Plan (IRP), which confirmed that Phase 2b of HS2, which comprised the eastern leg of the network between Birmingham and Leeds, would not proceed • In terms of the Primary North / South Access Road, they noted that the Neighbourhood Plan included a vision “to build a new north-south access primary road to ease traffic congestion before significant further homes are built” (p.35) and that paragraph 9.17 stated that “this must be included as part of any masterplan for the [Barracks] site” and paragraph 10.16 stated that it should be “safeguarded until it is constructed”. They referred to Guideline 5 stating that a north/south primary access road through the area from the A52 and which runs down through the Barracks should be designed to mitigate traffic congestion caused by the additional housing and 	

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	<p>employment in the area. They referred to supporting text at paragraph 10.18 stating that “all masterplans must support this road and not compromise the timing of its delivery”. They referred to Policy INFO2 stating that “In line with INF01, a new North-South Primary Access Road is required to both relieve issues with Stapleford Lane and also act as the local infrastructure for the development within Chetwynd Barracks and SLG”. They claimed that the supporting text stated without an ‘evidential basis’ that this road is “essential to assure the successful delivery of circa 1,500 dwellings on Chetwynd Barracks as well as helping with the development either side of Stapleford Lane in the SLG”. They noted that an indicative alignment is shown on the Policies Map and at Figure 9.3.</p> <ul style="list-style-type: none"> • They noted that the North-South Primary Access Road is expressed as an essential requirement to support the redevelopment of the Barracks, although they claimed that no triggers for the delivery of any or all of it are set out. • They claimed that there is no reference to the North-South Primary Access Road in the ACS [Broxtowe Aligned Core Strategy], and only one reference to it in the Part 2 Local Plan. That is within Policy 3.1, which includes five bullet points under the heading ‘Connections and Highways’. Bullet point d) is that the development of the Barracks should “ensure that the ability to provide a north/south road to link to the tram park and ride site is positively facilitated by development”. 	

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	<ul style="list-style-type: none"> • They noted that, in the absence of any published design, they assumed that the Toton Lane Link Road scheme comprised two parts, or phases; the first comprising a road that will by-pass Bardills roundabout and which will link from the A52 east of the roundabout to Stapleford Lane/Toton Lane; and the second comprising a spur that connects with the northern boundary of the Chetwynd Barracks allocation. • They referred to their representations to the Toton and Chetwynd Barracks Strategic Masterplan SPD and associated meetings in relation to highways. • They claimed that from those meetings, a clear consensus had emerged that the primary purpose of the Toton Link Road was to allow greater connectivity in the local area network, providing an opportunity to take some pressure off Stapleford Lane/Toton Lane, but that was not its main aim. Moreover, they claimed that the consensus was that this road would comprise a standard residential road with a 30mph design speed, which would follow a horizontal alignment to overcome the significant slopes in the western part of the Barracks site. • They raised concerns that this road was neither designed, funded nor programmed and, moreover, they had not identified any studies or models which have set out its intended functional specification, or which had evaluated to what extent the development of the Barracks or the SLG was dependent on its delivery. They were also concerned that its potential environmental 	

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	<p>consequences had not been evaluated.</p> <ul style="list-style-type: none"> • They referred to the SEA Screening Report in respect of the Submission version of the Neighbourhood Plan, and references to potentially influencing strategic plans higher up in the spatial planning hierarchy, including the ACS and the Part 2 Local Plan. They suggested that this appeared to be at odds with Basic Condition (e) because it indicates a conflict with the ACS and Part 2 Local Plan, because neither had tested or allocated provision for a Link Road. They considered that this was reinforced by the concerns expressed in the Screening Report about the inclusion of a policy in the Neighbourhood Plan requiring the delivery of the North-South Primary Access Road, without the implications of that having been tested in relation to air quality, emissions and pollution, landscape and biodiversity. • They noted that the Borough Council had recommended that the Forum should re-word this as an 'aspiration'. • They emphasised that they acknowledged the content of Policy 3.1, and that they had explored how the outline planning application would "facilitate" a Link Road, should the need for that be confirmed through evidence, and suggested that they had tested their conclusions on that matter with officers from BBC and NCC. They referred again to representations to the Strategic Masterplan SPD. • In relation to 'heritage considerations', they noted that Policy 3.1 of the Part 2 Local Plan includes two references to heritage. 	

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	<p>The first requires that redevelopment provides public access to the Listed Memorial to workers of National Filling Factory No.6, and that it retains the existing memorial garden. The second is that redevelopment should: “Retain and re-use existing military buildings (non-designated heritage assets) where possible, if not possible, the development should seek to incorporate the existing footprint of the building into the development layout”.</p> <ul style="list-style-type: none"> • They noted that Building 157 would not be retained given its scale and the very substantial negative impact that retention would have on the ability to deliver other key objectives, including the delivery of new homes, in accordance with the Local Plan. They suggested that the rationale for its demolition, and the potential to retain a memory of the building in the development (either through layout, and/or the retention of artefacts within the scheme) would be clearly set out in the outline planning application, so that the LPA could conclude whether the judgment required by paragraph 203 of the NPPF had been appropriately applied. • They noted the Forum’s proposal in the supporting text to Policy LHC02 that all those buildings and structures listed in Appendix II should be “protected from future development by being ‘Locally Listed’ with the Plan” and with Policy LHC02 itself expressing a “presumption in favour of their protections and/or re-purposing for public benefit”. They considered that, as a matter of principle the approach set out conflicted with 	

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	<p>Basic Condition (a) because the NPPF includes no such “presumption in favour of retention” in relation to non-designated heritage assets, certainly to the extent that such assets are to be “protected from future development”. They considered that it also conflicted with Basic Condition (e) because it promoted an approach that goes beyond that set out in Policy 3.1 both in terms of the number of assets that are included in Appendix II, and in setting out a “presumption” in favour of their retention.</p> <ul style="list-style-type: none"> • In terms of Green Infrastructure, they noted that the site contains areas of green infrastructure which they viewed as substantial assets to be retained within the outline planning application. • They were pleased to note that the Regulation 16 draft Plan had annotated those figures and diagrams that relate to green infrastructure as ‘Indicative’ (Figures 9.1, 9.2, 9.5 and 13.2). However, they remained concerned that the Neighbourhood Plan included in Policy ENV04, Table 13.1 and Appendix II (List of Valued Assets (Green and Heritage) in [our] Neighbourhood Area), a level of detail over the dimensions and land-take associated with green infrastructure that, they claimed, was inappropriate and overly prescriptive for inclusion in the Neighbourhood Plan. They suggested that these matters required careful and iterative assessment based on a complete evidence base and in balance with other place-making, design and development objectives. They 	

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	<p>suggested that this is the approach that they will adopt, in consultation with the LPA, Forum and other stakeholders, including through community consultation ahead of settling on a preferred Masterplan.</p> <ul style="list-style-type: none"> • They were concerned that some of the green corridors did not, and could not, as per their stated aim, connect areas of public open space, and that some extended outside the boundaries of the principal allocations. They noted that these concerns were, to an extent, mitigated by the green corridors being shown as indicative, allowing for careful deliberation over their location and extent at the appropriate time and also addressing concerns that the green corridors pass across buildings that may be retained. • They suggested that the Broxtowe Green Spaces Strategy was no longer extant so that references to it, and any reliance upon it, in the Neighbourhood Plan should be removed (e.g. at Table 13.1 and in the evidence base). • They considered that, whilst acknowledging that it is for the Forum to decide whether it sees merit in seeking designation of areas as Local Green Space (LGS), and to demonstrate that the criteria for designation at paragraph 102 of the NPPF are met in the case of each of the areas that they propose be designated, there were unsure of the extent of the areas that the Forum was seeking to designate. They suggested that this was because they were defined only by 'pinheads' on Figure 13.1. Yet, they noted, Appendix II of the Neighbourhood Plan includes site 	

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	<p>areas for Hobgoblin Wood, the playing fields and Memorial Gardens, and for other areas. They stated that they did not know how the pinheads related to the areas in Appendix II. They claimed that the lack of clarity over the areas, and the lack of adequate justification for designation against the criteria in paragraph 101 and 102 of the NPPF was of concern and, as a consequence, the full implications of the proposal in ENV01 remained unclear. They noted that, given the comment at paragraph 103 of the NPPF (that “policies for managing development within a LGS should be consistent with those for green belts”) this was of great concern, and was why they suggested at the Regulation 14 stage that the Forum should be clear about the boundaries of the proposed LGS. Because the Forum had not done so, they claimed that Policy ENV01 sets up a conflict with the basic conditions.</p> <ul style="list-style-type: none"> • They were also concerned that the reference to the Forum assessing the potential for other Local Green Space to be designated during the plan period was inappropriate because: the NPPF is clear (para 101) that LGS “should only be designated when a plan is prepared or updated” so that this element of ENV01 conflicts with Basic Condition (a); and it suggests that the Forum might at any time seek to designate LGS, which leads to significant uncertainty in the preparation of the outline planning application, and in relation to the impact on the Strategic Policies of the Plan (i.e. Policy 3.1), if the effect 	

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	<p>of further designations were to impact on site capacity and viability.</p> <ul style="list-style-type: none"> • They noted that the Regulation 16 draft Plan promoted the delivery of a neighbourhood scale centre as that might create a sense of place that is currently absent from the area. The Plan anticipated that the new centre would be located adjacent to the Memorial Garden (as does the Strategic Masterplan SPD) and that retail floorspace would be provided alongside other facilities, such as the primary school and medical facility that Policy 3.1 of the Part 2 Local Plan requires to be located in the eastern part of the site. The Plan envisaged the new centre as being car-free and comprising of an open plaza. They agreed that the centre is likely to be of a 'neighbourhood' scale, comprising of shops and services catering to a catchment comprising the new development and existing residents close to the site. They also considered that these uses may be best located in the eastern part of the site. They noted that they would need to assemble evidence to support this and to inform the parameters that will be adopted in the outline planning application. • They considered that the centre should be characterised as a 'Centre of Neighbourhood Importance' (rather than 'Local' centre) as per the hierarchy in Policy 6 in the ACS and that it was most likely to be delivered in the eastern part of the site. They suggested that the centre might be anchored by a convenience store, and might comprise other uses in Classes E and F as well as sui generis uses. They suggested that 	

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	<p>these various uses might be distributed around the site, and with some accommodated in any retained buildings, so as to support best overall outcomes.</p> <ul style="list-style-type: none"> • Avison Young, on behalf of Homes England and the DIO, made detailed, specific comments in relation to the following chapters and policies of the Neighbourhood Plan: <ul style="list-style-type: none"> • Section B, Chapter 9, Page 35 (Vision) 54-57 • Section B, Chapter 9, Page 39 (Fig 9.4) 58 • Section B, Chapter 9, Para 9.6, Page 40 (Community (Yellow Zone) 59 • Section B, Chapter 9, Para 9.21-9.23, Page 43 (MMC and Building 157) 34-37, 60 • Section C, Guideline 03, Page 47 (De-culverting Moor Brook) 61 • Section C, Guideline 05, Para 10.16-10.18, Page 48 (North-South Access Road) 22-33, 62 • Section C, Aspirations 04 and 06, Guideline 08, Pages 50-51 (Re-purposing Buildings) 34-37, 63 • Section D, Chapter 13, Policy ENV01, Fig 13.1, Page 58 (Local Green Space) 44-45, 64 - 67 • Section D, Chapter 13, Policy ENV02, Page 59 (Use of existing green space) 68 • Section D, Chapter 13, Policy ENV04, Page 60 (Green Corridors and Green Spaces) 38-42, 69, 70 	

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	<ul style="list-style-type: none"> • Section D, Chapter 13, Policy ENV05, Page 64 (green space management) 71 • Section D, Chapter 13, Policy ENV06, Page 64 (Tree Removal and Retention) 72 - 74 • Section D, Chapter 13, Policy ENV08, Page 65 (Ecology and Connectivity) 75 • Section D, Chapter 14, Policy INF02, Page 67 (Infrastructure) 76 - 81 • Section D, Chapter 15, Policy HAS01, Page 71 (Housing Mix and Affordable Mix) 82 - 84 • Section D, Chapter 15, Policy HAS03, Page 72 (Energy Efficiency) 85 • Section D, Chapter 15, Policy HAS04, Page 72 (High Speed Data Connectivity) 86, 87 • Section D, Chapter 15, Policy HAS05, Page 72 (Low Carbon Energy) 88 • Section D, Chapter 15, Policy HAS06, Page 73 (Water Consumption) 89 • Section D, Chapter 15, Policy HAS07, Page 73 (MMC) 90 • Section D, Chapter 16, Policy URB04, Page 76 (Architecture and Design) 91 • Section D, Chapter 17, Policy LHC02, Page 79 (Heritage) 37, 92 - 95 • Section D, Chapter 17, Policy LHC07, Page 81 (Playing Fields and Sports) 96, 97 • Section D, Chapter 18, Policy EMP02, Page 84 (Employment Zone, the Barracks) 98 - 102 	

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	<ul style="list-style-type: none"> • Section D, Chapter 18, Policy EMP05, Page 85 (Neighbourhood Centre) 46-53, 103 • Policies Map 104 	
National Highways	<ul style="list-style-type: none"> • They noted that the growth aspirations at Toton did not appear to have been updated to account for the HS2 East Midlands Hub station no longer being situated at Toton. • They therefore expected that the development aspirations, and potentially transport infrastructure proposals, would change from that set out in this consultation, however they suggested that this should be clarified. Any proposal to deliver a new junction on the SRN requires a Strategic Business Case demonstrating the need, impacts, benefits, and evidencing that the growth aspirations cannot be accommodated via upgrade to the existing junctions on the network. • They noted that the decision to grant or refuse permission would not be made by National Highways, but by the DfT (Department for Transport). • They raised an additional concern that this proposed junction would be located in close proximity to the existing Bardills roundabout, which itself suffers from capacity constraints and would be expected to interact with the new junction, with queues from one reaching back to, and interfering with the other. They noted that this proposal would require an application for Departures from Standards to be approved. • National Highways was concerned that the delivery of this new connection to the A52 would have a 	N/A

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	detrimental impact on journey times, reliability of the SRN to serve both local and long distance trips, as well as highway safety.	
NHS Nottingham and Nottinghamshire Integrated Care Board	<ul style="list-style-type: none"> • They noted that the Neighbourhood Plan should include information in relation to developer contributions (through Section 106 contributions) for the provision of primary care. 	N/A
Nottingham City Council [including on behalf of Nottingham Express Transit (NET)]	<ul style="list-style-type: none"> • They noted that it would be necessary for the proposed new north-south primary access road to be grade separated where it crosses the tram alignment, and for agreement to be reached with Tramlink Nottingham and Nottingham Trams, with regard to the design and construction of the new structure. • They stated that the re-routing of bus services through the Area should be informed by a comprehensive public transport plan. Direct competition between tram and bus services is to be discouraged, with consideration given to feeder buses and interchange at tram stops. 	Yes
Nottinghamshire County Council	<ul style="list-style-type: none"> • They noted that the Neighbourhood Plan relates to the proposals in the adopted Part 2 Local Plan in relation to the Chetwynd Barracks and Toton area, considering primarily the wider Toton and Chilwell neighbourhood but touching upon the area covered by the Toton and Chetwynd Barracks Strategic Masterplan SPD which was published by the Council in October 2021. They note that this Masterplan will guide the Toton-Chetwynd strategic development area and that the Strategic Masterplan SPD forms the key document to guide strategic development and that it would be 	N/A

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	<p>adopted by the Borough Council in due course. They recommended that the Neighbourhood Plan should be finalised in the context of this document.</p> <ul style="list-style-type: none"> • They noted that the Plan needed to be updated as it was not expected that it would be possible to deliver the Toton Hub proposal in light of the Integrated Rail Plan announcement in relation to HS2 at Toton. • They noted that they had no specific concerns about the Plan from a minerals and waste planning perspective. • They noted that the southern boundary of the Plan area is within the safeguarding area for sand and gravel, but as this area has already been developed, there seems no future opportunity for minerals extraction. • They noted that there is support within the Neighbourhood Plan for the general emphasis on sustainable transport, development and encouraging the use of public transport. They suggested that the statement at 5.4 is amended to read as follows: 'Commercial bus services run frequently along the A6005 between Long Eaton and Beeston (and beyond to Derby/Nottingham). Chilwell (Inham Road/Field Lane estate) is well served by frequent Nottingham City Transport buses. Subsidised County Council services also serve Toton'. • They supported paragraph 10.22, i.e. Specific infrastructure identified to be provided through planning contributions should include funding to encourage multi modal active travel as well as improving public 	

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	<p>transport provision - more local bus services and more bus stops.</p> <ul style="list-style-type: none"> • They supported Core objectives including: “promote schemes to help reduce congestion on local roads and add flexibility to transport options” and “Promote schemes to help reduce congestion on local roads and add flexibility to transport options”. • They made reference to other text within the Neighbourhood Plan. • They recommended that aspirations set out in the National Bus Strategy, BSIP document and Enhanced Partnership should be referred to in the Neighbourhood Plan and reflected in the public transport facilities in the Neighbourhood Plan area. • They noted that community transport services are provided in the plan area by ‘The Helpful Bureau, Stapleford’, and they suggested that reference to their work should be included within the Plan, together with the potential for Community Transport and related services including flexible transport solutions to complement the local bus network i.e. Demand Responsive Transport (DRT), and taxi buses. • They noted that there was no reference in the document to the role of taxis, which are licensed by Broxtowe Borough Council and play an important role in the local economy. They suggested that reference to the role of taxis should be included in the plan. • They considered that it was not made clear how the Neighbourhood Plan relates to the Toton and Chetwynd Barracks Strategic Masterplan SPD. They noted that 	

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	<p>there was the potential for confusion and it stated that it would be helpful to be clear about how the two documents should be read together in terms of the overlaps with the Toton-Chetwynd strategic development area which, they noted, was a key project of the East Midlands Development Company, which is to become a Development Corporation with associated planning responsibilities.</p>	
<p>Nottinghamshire County Council – as Local Highway Authority</p>	<ul style="list-style-type: none"> • They noted that the Neighbourhood Plan should also compliment the Toton and Chetwynd Barracks Strategic Masterplan SPD. They considered that an area where these documents conflicted was on the issue of on-street parking provision. The Neighbourhood Plan advocated off-street parking should be provided on an actual rather than theoretical basis to reduce on-street parking, whereas the Strategic Masterplan SPD seeks to minimise the level of provision below current standards. • They noted that Toton Sidings is no longer being used to facilitate the expansion of HS2. They stressed that, at this stage, it is not known what will replace the ‘Hub’ or what this will mean for the wider site. • They noted that it may be worthwhile considering that piecemeal development will not be supported until the overall development aspirations have been finalised by the Strategic Masterplan SPD. • They noted that Para 9.17 referred to a new north/south link road between the A52 and A6005. They noted that this was incorrect. The intention is for the link road to meet Swiney Way from which the A6005 	<p>N/A</p>

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	<p>can then be reached. They noted that it was assumed that the new north/south link road would help relieve some of the congestion on surrounding streets. They noted that this is not necessarily the case as its main purpose will be to distribute development traffic within the site and onto the strategic road network.</p> <ul style="list-style-type: none"> • They noted that any works to improve junction performance would be determined by a Transport Assessment and that this may result in development being delivered prior to any upgrades being implemented and so the assertion that key junctions should be upgraded prior to development taking place may not come to fruition. • They noted that no reference had been made with regards to Nottinghamshire County Council's Highway Design Guide. They stressed that any future masterplan should be compliant with this document to ensure road layouts are properly designed and adopted as public highway. 	
<p>Nottinghamshire Wildlife Trust</p>	<ul style="list-style-type: none"> • They supported all Core Objectives and all supporting policies (ENV01-08) and supporting text / the evidence base (pages 58-65). In relation to Policy ENV7, they queried if the term 'green landscape plan' has a formal definition. If not, they suggested that using Biodiversity-focused (or Biodiversity-led) Landscape (Master) Plan, or similar wording might be more appropriate. • They noted that the Policy EN7 supporting justification paragraph mentioned enhancing future management in the context of road verges and including wildlife 'features' in build environment, such 	<p>Yes</p>

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	<p>as bird and bat boxes/ bricks etc. To help secure this, they suggested that the requirement for a 'Landscape and Ecological Management Plan' (LEMP) for any new development and associated open space was additionally included within the policy requirements.</p> <ul style="list-style-type: none"> • They stressed that post-construction monitoring and reporting on the success of habitat creation is important and often overlooked. They recommended that this be secured by Policy ENV7. 	
<p>Peeveril Homes – Stone Planning Services</p>	<ul style="list-style-type: none"> • They considered Figure 4.3 to be misleading and noted that the notation attached to the green shading refers to Green Belt. They noted that the majority of the identified land is not within Green Belt. They noted that its status was changed by virtue of the adopted Aligned Core Strategy and the Part 2 Plan. Furthermore, they stated that the figure does not make reference to the Toton Strategic Location for Growth, which they considered to be a serious omission and misleading. • In relation to paragraphs 6.3 to 6.9 which referred to the Hub, they noted that there is no acknowledgement of the Integrated Rail Plan of November 2021 which was agreed by Government. They noted that this followed the publication of the Oakervee Review of HS2 in February 2021. • They noted that a HS2 Station Hub to serve the East Midlands is no longer proposed at Toton and that it was to be delivered at East Midlands Parkway. They noted that there might be a more local/regional station but its scale and form was 	<p>Yes</p>

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	<p>unknown and that any delivery would be beyond the Neighbourhood Plan period. They considered this to be a major omission from the Plan and so significant that the plan was not consistent with the Framework. They considered that the Plan in its entirety needed review.</p> <ul style="list-style-type: none"> • They noted that paragraph 9.5 again referred to Character Zones, and referred to “East Midlands Hub Station” (Outside the Forum Area), as was highlighted on Figure 9.5 and similarly Figure 10.1. They considered that the character and development zones were all driven by the construction of an East Midlands HS2 Station Hub and that there was no analysis or assessment as to the impact on the development zones of there being no such station or a substantially downgraded one beyond the Plan Period. They considered that the nature and form of development would be very different in a ‘no HS2 Hub’ scenario. • They noted that Policy ENV03 related to open space and green corridors. They noted that it envisaged green corridors up to 80 metres wide. They considered this to be excessive and a ‘cordon sanitaire’, not a corridor. They considered that 80 metres was very excessive and ‘totally unjustified’. They considered that a corridor of this width, as shown on the Policies Map would 1. Prevent any development south of the new access on the western side of Toton Lane. This would reduce housing numbers in this area and so place pressure to release further green belt land elsewhere to meet 	

RESPONDENT	SUPPORT / OBJECT / COMMENTS	ASKED TO BE NOTIFIED OF DECISION IN RELATION TO NP
	<p>identified needs; 2. Prevent any development to the south of the new road on the eastern side of Toton Lane. This would reduce housing numbers in this area and so place pressure to release further green belt land elsewhere to meet identified needs. Furthermore, they noted that the route of the new road that would link Toton Lane with the A52, and so reduce pressure on the Bardills Island, would pass through this land. They noted that the County Council had submitted a Government bid to secure some funding for its construction and that private sector contributions would be required. They considered that if there was no incentive to develop, then private sector funding would not be forthcoming and the road would not be constructed and public benefits would be lost; 3. Hinder the provision of access to the Chetwynd Barracks site. They noted that the northern access into the Barracks is dependent on the new road being constructed and landowners then agreeing to access the Barracks. Again, they were concerned that if there is no incentive to build because the majority of their land is within a 'green corridor' then the Barracks site would have to go forward without a northern access. They noted that this would have major implications the local highway network in Toton and Chilwell and had not been considered in the Plan; 4. Not take into account the changing movement patterns of the Barracks when redeveloped. They noted that pedestrians currently walk along an 'unlit dark path' along the southern boundary of the Toton site and that its point of connection</p>	

RESPONDENT	SUPPORT / OBJECT / COMMENTS	ASKED TO BE NOTIFIED OF DECISION IN RELATION TO NP
	<p>with Toton Lane does not and would not be consistent with the future crossing points of Toton Lane. They suggested that a diagonal corridor from the barracks site to the crossing point would be appropriate and this this would not require an 80-metre wide corridor.</p> <ul style="list-style-type: none"> • They considered that a maximum 20 metres wide corridor would deliver a highly sustainable corridor which would meet the objectives of the Plan. • They noted the requirement for the Plan to have regard to National Policy and that it should also be in general conformity with Strategic Local Policy. They stressed that the Plan's policies should be aligned with the strategic needs and priorities of the area. They stated their view that if the Neighbourhood Plan persisted with policies and plans that are set out in the belief that a HS2 Station Hub is to be constructed immediately to the west, then it would be flawed. • They considered that the Plan should be reconsidered without the Toton HS2 Station Hub and that its presence or absence was fundamental to the Plan being positively prepared, justified, effective and consistent with National Policy. • They objected to the Plan for the following reasons: <ol style="list-style-type: none"> 1. That the Plan had been prepared on the basis that the East Midlands HS2 Station Hub would be constructed at Toton. 2. That there were numerous references to land being within the Green Belt, when it is not. 3. That Policy ENV03 required what they considered to be an 	

RESPONDENT	SUPPORT / OBJECT / COMMENTS	ASKED TO BE NOTIFIED OF DECISION IN RELATION TO NP
	<p>unacceptable and unjustified 80-metre wide green corridor.</p> <p>4. That wide unjustified corridors would stifle development and could prevent the provision of a northern access to the Chetwynd Barracks site.</p> <ul style="list-style-type: none"> • They requested that they should be afforded the opportunity to present their views to the Independent Examiner. • They noted that their client is a major stakeholder in the delivery of the Strategic Location for Growth at Toton. • Consultation responses to earlier consultations and also the Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document were also included within their submission. 	
Severn Trent Water	<ul style="list-style-type: none"> • They welcomed Blue and Green Infrastructure-related policies and included general advice and general policy wording suggestions: <ul style="list-style-type: none"> • They provided general comments in relation to the following issues: <ul style="list-style-type: none"> • Wastewater strategy • Surface water • Sustainable Drainage Systems • Blue and Green Infrastructure • Water quality and resources • Water supply • They included 'general' suggested policy wordings to cover the following: <ul style="list-style-type: none"> • Drainage Hierarchy • Sustainable Drainage Systems • Blue and Green Infrastructure • Green Open Spaces • Protection of Water Resources 	N/A

RESPONDENT	SUPPORT / OBJECT / COMMENTS	ASKED TO BE NOTIFIED OF DECISION IN RELATION TO NP
	<ul style="list-style-type: none"> • Water Efficiency 	
Sport England	<ul style="list-style-type: none"> • They provided general advice and more specific advice as summarised within the following bullet points. • Sport England supported policy LHC07. • However, Sport England was concerned with Policy LCH06 regarding a new Leisure centre for the area in the following area. • In relation to out of date evidence – The Broxtowe Borough Council Built Sports Facilities Strategy dates from 2016 – as far as [they] were aware this report has not been kept up to date. No robust evidence was therefore available • Para 98 NPPF 2021. - They noted that the policy appeared to be at odds with the Draft Toton and Chetwynd Barracks Strategic Masterplan SPD. • They noted that wider decisions about the future leisure strategy for Broxtowe are expected to be made in the near future’. • They understand that various reports have been tabled regarding the future of Bramcote Leisure centre. They note that as of Jan 2020 consultants had been appointed. • They also understand that more detailed feasibility work is under way for the replacement of Bramcote Leisure centre. • They noted concerns in relation to Local Plan policy wordings. • They noted that whilst is it for the neighbourhood plan to assess and promote what is believed is appropriate (but appears in line with the local plan) for that area it appeared that there should be co- 	N/A

RESPONDENT	SUPPORT / OBJECT / COMMENTS	ASKED TO BE NOTIFIED OF DECISION IN RELATION TO NP
	<p>ordination using appropriate evidence to understand what is the right facility in the right place to meet the needs of the existing population and for growth.</p>	
The Coal Authority	<ul style="list-style-type: none"> • They noted that no recorded coal mining features were present at surface or shallow depth, which might pose a risk to surface stability or public safety within the identified Neighbourhood Area. On this basis the Planning Team at the Coal Authority had no specific comments to make. 	N/A
Bramcote Neighbourhood Forum	<ul style="list-style-type: none"> • They made objections in relation to the proposed link road for reasons including: Loss of greenfield land and green corridors; Loss of Green Belt land (serving several of the 5 five functions); Contrary to the Borough Council's 2028 Carbon Neutrality target; Air and noise pollution – including along a green corridor; More land could be lost from the Green Belt. They noted that it would be a waste of millions of pounds of public money. • They noted that a junction on the A52 between Bardills and the Sherwin Arms would slow traffic and create additional congestion on one of the main routes into Nottingham. • They noted that the leisure centre in Bramcote is well used and that this should be re-built in this location in line with Local Plan policy. They noted that a leisure centre in Toton / Chetwynd would not be accessible to many residents of Broxtowe and they claimed that the aspiration for new bus services in the Neighbourhood Plan supported this view. They claimed it would lead to more traffic and would deter people from exercising. 	Yes

RESPONDENT	SUPPORT / OBJECT / COMMENTS	ASKED TO BE NOTIFIED OF DECISION IN RELATION TO NP
Chilwell School	<ul style="list-style-type: none"> • They noted that there was an opportunity to invest in the facilities and space at Chilwell School, including improving the existing leisure facility. They claimed that the loss of HS2 weakens the case for development at George Spencer. • They noted that they had previously made representations to the Forum. 	Yes
More Detailed Response from a Member of the Public		
Response A	<ul style="list-style-type: none"> • A very detailed report was received from a member of the public, titled: <i>'Making cycling a viable option for accessing Toton Area Development from within a 5-mile radius'</i>. • This 13-page document included an introductory chapter and then sections on: the working assumptions about the wide-area network; the local-area network; suggested local-area routes (broadly south west to north east); suggested local-area routes (broadly north-west to south-east); suggested B6003 mitigations; combination of wide-area routes with local-area routes; and, recreational trips. • It also included a number of very helpful and informative plans and sources of further information. • In addition, a nine-page document was submitted in relation to 'public transport', including a number of suggestions. • A further seven-page document was submitted including recommendations in relation to the Chetwynd: The Toton and Chilwell Neighbourhood Plan. This covered topics including: 	

RESPONDENT	SUPPORT / OBJECT / COMMENTS	ASKED TO BE NOTIFIED OF DECISION IN RELATION TO NP
	<ul style="list-style-type: none"> • Implications of the Integrated Rail Plan (IRP); • The geographical scope and timeframe of the Neighbourhood Plan; • Master-planning; • Cycling and walking; • Public transport; • Highways; • Delivery of infrastructure / responsibility for delivery; • Funding of infrastructure; and • References and further information. <p>Responses from other members of the public are summarised within the next section of this document.</p>	

Members of the Public

2.3 Representations from other members of the public covered a number of issues (relating to the Neighbourhood Plans policies, aspirations and other parts of the document). Many of the objections related to the proposal for a new north-south link road and a new leisure centre. Responses from members of the public included:

North-South Link Road / Access Road

- Concerns relating to the issue included:
 - Concerns relating to air pollution;
 - Concerns relating to potential junction locations;
 - Contrary to aspirations for Net-Zero or carbon neutrality (including the Borough Council's 2028 target);
 - Cost implications (including loss of funding for other projects);
 - Poor value for money;
 - Unnecessary cost of a new junction;
 - Implications for public spending;

- Loss of greenfield land;
- Loss / potential loss of Green Belt land;
- Further Green Belt land would later be at risk of loss / vulnerable to further development;
- Loss of green corridors;
- Loss of recreational land;
- Loss of / damage to open space;
- Loss of nature;
- Loss of biodiversity;
- Loss of wildlife;
- Loss of trees;
- Loss of important local views;
- Loss of 'beauty';
- Increased congestion on the A52;
- Air pollution;
- Noise pollution;
- Risk of new commercial / industrial development along the route;
- Environmental damage;
- Unnecessary development;
- Traffic surveys at Bardills are required as it is 'not congested';
- Not needed as a result of the HS2 decision;
- The rationale for the project, even with a 'normal' station, no longer applies;
- Supporting infrastructure not in place;
- Further roads are not needed;
- Green land is needed for mental health;
- Risk that the new road will lead to further development (including commercial / industrial) in the future;
- 'Broxtowe Borough Council should be protecting this land rather than 'building roads' on it';
- Concerns about the implications upon journey times / delays;
- It duplicates / would run parallel to Toton Lane;
- It would result in more cars and be disastrous for the environment;
- It would sever an important historical link between Stapleford and Toton;
- It would restrict access to educational buildings on Toton Lane;
- It would restrict access to the Toton Park and Ride site from the south;
- the proposals would only bring detriment with no benefits;
- Should be discouraging car use;
- A new road crossing the tram tracks would increase congestion (traffic backing up due to tram 'priority');

- A new junction onto the A52 would be dangerous and would create congestion;
 - This development will not 'level-up' the local area;
 - There is less demand for new roads (including as a result of an increase in working from home);
 - The present Toton Lane is a critical connection for north-south traffic for that area;
 - Present commute and school run traffic will be adversely disrupted;
 - The road fails to add essential east-west capacity for the new developments or to accommodate the inevitable east-west commute traffic;
 - It is poor/inefficient utilisation of valuable land area;
 - The route proposed follows a significant natural sight-line across the landscape that will be highly prominent and unsightly;
 - It reduces the viability of the existing working farmland;
 - It threatens to make the existing working farmland there unviable;
 - It will promote development across the remaining historical and locally significant open space in the area to threaten forming a metropolis;
 - The road bisects a long established large open area causing undue negative impact upon the nature and character and wildlife and the existing utilisation that is long established for that area.
- Suggestions in relation to this issue included:
 - Public transport use should instead be encouraged;
 - Any road north out of Chetwynd Barracks should terminate at the Toton Park and Ride and not seek to make car travel more attractive;
 - Cycling infrastructure should be provided instead;
 - Incorporating any road within the landscape (e.g. 'cut and cover') would be desirable;
 - Access to development at the Sidings & adjacent should use [HS2's] A52 junction, rather than Toton Lane/Stapleford Lane;
- Support in relation to this issue included:
 - The road is essential to ease the burden of traffic through Toton;
 - Infrastructure requirements are addressed [within the Neighbourhood Plan].

New Leisure Centre within the Plan Area

- Concerns / comments in relation to this issue included:
 - Concerns that any new leisure centre should instead be located at Bramcote;
 - A leisure centre within the Plan Area rather than at Bramcote would reduce accessibility;
 - Bramcote and Wollaton would lose out through fewer local facilities;
 - A leisure centre is not required as there are facilities at Chilwell Olympia;
 - The leisure centre in Bramcote is well used and it should be re-built in this location in line with Local Plan policy;
 - A leisure centre in Toton / Chetwynd would not be accessible to many residents of Broxtowe.

Other Objections / Concerns

- Concerns relating to the loss of greenfield land;
- Concerns that the proposed housing density at the Barracks is too high;
- Concerns as to whether the development is needed now that HS2 will not be coming to Toton;
- Questions in relation to the rationale / benefits;
- Concerns relating traffic congestion, including along the A52, Bardills Island and on other local roads;
- Concerns relating to the loss of Green Belt land and other green corridors;
- Concerns relating to the loss of wildlife;
- New development unnecessary; it is duplicating what is already there. There are more important priorities for the money;
- Loss of Green Belt land will impact upon Bramcote village; Bramcote will lose its village 'feel';
- Concern in relation to one of the proposed cycle routes through the existing housing estate to the potential HS2 station as shown on Figure 14.2 (the response included a significant number of reasons);
- No need to use Green Belt land for housing;
- Given the expected loss of nearly all of Toton's green belt to development, very little green infrastructure is proposed. In particular, there is no attempt to protect the Toton Local Wildlife Site & adjoining woodland to the south or the surviving green belt land east of Toton Lane/Stapleford Lane;
- Loss of footpaths will result in greater use of private cars;

- Development should be directed towards other brownfield sites;
- Questions and concerns in relation to Table 13.1, including in relation to the loss of green space;
- Concerns that the number of eventual dwellings is still too high for the proposed infrastructure;
- Concerns about the consultation undertaken;
- Concerns about relocating George Spencer Academy due to pollution concerns (from the proposed new road);
- Since HS2 is not now coming to Toton, and it is very doubtful whether the sidings will actually end up being developed as a major centre, the strategy/plan and also the consultation are completely 'undermined'. The area in question is an important green space adjacent to a lot of urbanisation and housing;
- Objection to the use of the Toton and Chilwell green fringe for an innovation campus, new housing, leisure centre and school. This area is a peaceful haven between Chilwell and the A52. During the pandemic this has been beneficial to the local area in giving a peaceful and quiet area to be able to get out, exercise or just relax. Losing this green and peaceful space would be tragic and a detriment to the area;
- The western boundary of the Neighbourhood Area is wrong. The correct Area boundary is the eastern boundary of the HS2 safeguarding zone, which extends east to the embankment, the Banks Road estate and the Greenwood Centre. Even though the HS2 station has been removed, the safeguarding zones remain.

Suggestions / Recommendations for Improvements

- Supporting infrastructure, including doctors and dentists will be required;
- An East-west route through Chetwynd Barracks is needed; New routes should not be 'limited access' but open to all vehicles; High-quality design of the east-west route will be essential;
- Links to the Toton Park and Ride and other roads to reduce the impact of commuting would be desirable;
- Good quality safe pedestrian access (including along new roads) will be essential;
- Relieving traffic on Stapleford Lane will be essential;
- Importance of ensuring Stapleford Lane is a safe route for school children;
- Funding for green spaces by developers should be included in the Community Infrastructure Levy & Section 106 agreements;
- The Plan needs to specify details of mitigation of noise from HS2 & classic rail trains and the station. At least 30 metres of dense woodland is required to achieve a significant effect. Residents value greatly the peace & tranquillity afforded by living near the Sidings;

- Suggestion for a facility for a 'Park Run';
- Most roads through the Barracks already exist and will need upgrading;
- Green space should not be lost;
- Fewer houses should be provided and a greater amount of green space should be retained;
- It should be designed for New-Zero or even Net Positive Energy from the outset;
- House construction should be more than the bare minimum in terms of quality (this can be detrimental to home owners – their mental health – and the environment);
- The importance of large areas of open countryside cannot be overstated. It is vital that [we] allow sufficient space for wildlife, not only because [we] should have respect for nature, but also because the benefits to [our own] physical and mental wellbeing are 'immense';
- Improvements to public transport, cycle paths and pedestrian paths are needed prior to construction;
- Bus and tram stops should be within walking distance;
- A greater number of smaller homes for singles, young families and pensioners wishing to downsize are needed. They should be well planned, well laid out and designed, giving access to outside space without total loss of privacy;
- The new leisure complex, green spaces, and community properties (schools, health care etc.) are essential for supporting Health and wellbeing;
- The importance of supporting apprenticeships is stressed;
- Less expensive, more sustainable housing is needed;
- The environmental impact should be at the fore of any decisions on planning proposals;
- Having a 'town centre' is a 'dream' for the local community;
- The provision of well-designed, high quality footpaths and cycle links and related infrastructure will be essential;
- Safety improvements along the A52 would be desirable;
- Excellent IT infrastructure will be essential;
- The Plan needs to contain a detailed survey of current traffic, together with forecasts of traffic from HS2 and from the developments at the Sidings, west & east of Toton Lane/Stapleford Lane and at the Barracks;
- Whilst pedestrians should not have to share pavements & footpaths with cyclists, the Plan needs to justify demand for more cycle lanes;
- The Plan is too HS2-centric. The Plan needs to recognise that classic rail, e.g. Long Eaton railway station, will remain more popular with Toton residents (due to cost);
- The Plan needs to specify the implementation of separated cycle lanes;

- The Plan needs to specify an alternative approach to a Residents' Parking Scheme, such as restricting pedestrian access to the station from Banks Road;
- The 800 houses allocated to the Toton site should 'be returned to their original locations and the land should be returned to the green belt';
- The Plan needs to justify demand for the new housing developments. These developments are unnecessary. The estimate of 4,500 homes is arbitrary;
- For each development, the Plan should specify the intended housing numbers & densities, together with the area sizes (hectares) required;
- The Plan needs to justify support for modular building. Concern that reduced construction costs are unlikely to increase affordability and reduced construction times will not reduce overall development times, while the resulting houses may deter buyers;
- For each development, the Plan should specify the area sizes (hectares) required for community infrastructure (schools, health, shops & community buildings) and green space;
- The plan needs a detailed forecast of demand for the school from the new developments and an estimate of the additional land & buildings required, irrespective of whether the school moves. The Plan needs to detail how a move would be funded, since government no longer funds new school buildings;
- An outside heated swimming pool could be provided for the school;
- The Plan needs to justify demand for the business park;
- The Plan needs to explain the term 'innovation campus'.

Support for the Neighbourhood Plan

- Support for the policies, aspirations, aims, ambitions, vision, guidelines and masterplan / framework which will guide development in the local area (several similar responses);
- The plan addresses all areas of life and environmental issues. It provides the area with a centre;
- Support for a new leisure centre including a swimming pool;
- Support for protecting the heritage of Chetwynd Barracks through conservation and re-purposing of heritage assets including the No. 6 Shell Filling Factory. This could be the centre around which the new community could be built. Re-purposing would also ensure that embodied CO2 is not lost through demolition;
- Support for the Plan, including for the creation of a high-skilled workforce through the development of centres of excellence;
- Support for the biodiversity policies of the Neighbourhood Plan;
- Support for greenspace for the local community;
- The Plan is ambitious;

- Support for the Plan’s forward-looking (green and sustainable) vision, inter-connected and community-oriented aims, and its carefully-researched and thoughtful detail;
- The Plan addresses local concerns & includes a plaza close to the WW1 memorial & gardens, a heritage trail, green corridors, active travel routes, affordable homes and all dwellings built to minimise environmental impact with the aim of being carbon neutral. Infrastructure requirements are addressed with new road layouts (in particular a new north-south route from the Barracks site), plus community, educational & healthcare needs, are included within the plan.

Other Comments and Clarifications Sought

- Whether the butterfly habitat at Toton Sidings will be protected;
- Suggestion to use the expertise of Nottingham University to promote better building implementation;
- Concern that Broxtowe Borough Council delayed the Plan process;
- All of the consultation for this plan was undertaken when it was expected that the HS2 hub would be developed on Toton sidings;
- Although there is reference to HS2 development at Toton, it does not seem to be updated to take into account recent announcements that HS2 will terminate at East Midlands Parkway;
- The connecting corridors have already been proposed by local government & developers;
- Note from a member of the public that the Plan, and in particular its policies, were developed on the basis that it would ‘stand in its own right’, for the long term, regardless of whether the Hub Station (or any station) would materialise or not;
- ‘As part of HS2 construction, the Environment Agency intend to improve the drainage & biodiversity of the Erewash floodplain’;
- Another comment notes that ‘nothing in any of the supporting paragraphs justifying each policy should be taken to be additional policy requirements’.

Pre-Hearing Statements

- 2.4 Pre-Hearing Statements were received from seven organisations. These Statements can be viewed on Broxtowe Borough Council’s website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/neighbourhood-planning/chetwynd-the-toton-and-chilwell->

[neighbourhood-plan/](#). The following organisations submitted Pre-Hearing Statements:

- Broxtowe Borough Council
- Chetwynd: The Toton and Chilwell Neighbourhood Forum
- East Midlands Development Company [EM DevCo]
- Homes England and the Defence Infrastructure Organisation [DIO]
- Bloor Homes (Oxalis Planning)
- Nottinghamshire County Council
- Nottingham City Council / Nottingham Express Transit [NET]

Representations Received to the Summer 2023 Additional Consultation

2.5 In response to the Independent Examiner’s Procedural Letter of 13th July 2023, Broxtowe Borough Council invited comments on the proposed amendments to the Chetwynd: The Toton and Chilwell Neighbourhood Plan and the Policies Map during a 4-week period which ended on Friday 25th August 2023.

2.6 The following organisations and individuals responded to this consultation:

- Arup on behalf of EM DevCo
- Avison Young on behalf of Homes England / DIO
- Environment Agency
- Historic England
- Nottinghamshire County Council
- Oxalis on behalf of Bloor Homes
- The Coal Authority
- One Member of the Public

2.7 A brief summary of these representations is included within the below table.

RESPONDENT	SUPPORT / OBJECT / COMMENTS
Arup on behalf of East Midlands Development Company [EM DevCO]	<ul style="list-style-type: none"> • East Midlands Development Company noted that they remain committed to engaging proactively with the Chetwynd: Toton and Chilwell Neighbourhood Forum in preparing the Neighbourhood Plan and that they continue to be supportive of the Neighbourhood Plan. • They noted that, as acknowledged by the amended Neighbourhood Plan, the Toton and Chetwynd Barracks Strategic Masterplan SPD was adopted by Broxtowe Borough Council’s Cabinet at its meeting on 7 February 2023. They noted that the SPD

RESPONDENT	SUPPORT / OBJECT / COMMENTS
	<p>therefore now fulfils the various requirements of a strategic masterplan set out in Policies 3.1 (Chetwynd Barracks) and 3.2 (Toton) of the P2LP, and has established the flexible spatial framework for development within the area covered by the SPD. They added that the adopted SPD is also therefore now a material consideration in the determination of relevant planning applications.</p> <ul style="list-style-type: none"> • They welcomed amendments to the Neighbourhood Plan, especially X9 and B32, which added to the Introduction and Evidence and Analysis sections to better-acknowledge the SPD and highlight its recent adoption. However, they considered the additions still did not appear to explain the role of the SPD as a ‘foundation document for development’ within the area it covers (in terms of establishing the spatial framework), that it is a material consideration in decision making, nor did they explain how it should be read alongside the Neighbourhood Plan. They considered that the Neighbourhood Plan should be further amended to clarify and explain these matters. • They continued to argue that it would be beneficial for Figure 25 from the SPD to be reflected in the Neighbourhood Plan to clearly depict the spatial framework for the area which has now been adopted, and reduce the perception of any divergence. • They considered that the Neighbourhood Plan needed to make the status of the Kefa Design work clearer, by including text alongside Figure 9.6, making it clear that this diagram is an extract from work that helped to inform the Plan. • They noted that the amended Neighbourhood Plan green infrastructure diagram (Figure 9.1) is slightly less definitive than the previous version (modification B48), however, they suggested that the indicative green corridors continue to suggest wide corridors significantly beyond what is shown in Figure 21 of the SPD. They continued to consider that the Plan should use (and build-upon, if desired) the green infrastructure framework diagram from the SPD rather than implying an alternative approach.

RESPONDENT	SUPPORT / OBJECT / COMMENTS
	<ul style="list-style-type: none"> • They expressed concern that two potential alignments for a future tram extension at Toton were being depicted on supporting mapping. They claimed that this worsened their previous concerns that this aspect of the Neighbourhood Plan would create uncertainty for communities and developers. They noted that they thought it would be acceptable for the Neighbourhood Plan's supporting text to refer to aspirations to work with local partners to continue to explore optimal routing for a future tram extension, but maps and diagrams in the NP should reflect the movement framework plan (Figure 23) in the SPD and not show alternative routings. • They noted that the previous aspiration 'zones', which included a depiction of George Spencer Academy's potential relocation, had been deleted and this amendment (B27) was welcomed. Additionally, they welcomed amendments to Policy LHC04 which indicated that the expansion of the school would be supported, without reference to potential relocation. • They expressed ongoing concerns around the continuing presence of a diagram (Figure 9.1) implying very wide green corridors, even if these were said to be indicative. They strongly considered that, in line with comments made on the amended Figure 9.1 above, further clarifications needed to be made to make the intentions of Policy ENV03 absolutely clear and avoid any unintended ambiguity around the scale of provision expected. • They noted that they would welcome the inclusion of references in the Neighbourhood Plan to the role of EMDC in continuing to develop ambitious plans for Toton and Chetwynd Barracks, including the provision of new strategic transport infrastructure. • They noted that Amendment B10 beneficially resulted in a new reference to the historic planning context at Toton, including the extant planning permissions. However, they suggested that this was done without further commentary on the context around these, including the expectation that they will not be implemented. They considered that these permissions should be referred to in the same manner as in the SPD (paragraph 2.11).

RESPONDENT	SUPPORT / OBJECT / COMMENTS
	<ul style="list-style-type: none"> • They noted that Amendment D-B8 on page 37 referred to the potential role of EMDC in the delivery of development, as well as the emerging Mayoral Combined Authority. However, they were of the view that this simply notes that both could have a role, and stated that ‘it is not clear how much influence’ EMDC will have. They were of the view that this statement appeared vague and unclear, and could result in the Neighbourhood Plan creating uncertainty for communities and developers. They considered that this new text should be revised and the ‘about us’ section of their website could be used to inform this.
<p>Avison Young on behalf of Homes England / Defence Infrastructure Organisation [DIO]</p>	<ul style="list-style-type: none"> • Avison Young submitted representations on behalf of Homes England and the DIO. These representations included 24 pages of comments on a significant number of proposed modifications. Suggestions for revisions – including modified policy wordings – were also included. • In terms of more general points, they were concerned that the proposed modifications should not have the effect of elevating the status of the Toton and Chetwynd Barracks Strategic Masterplan SPD in the decision-making process, above that of a “material consideration” (noting that the SPD is non-statutory, not fully evidence-based, has not been subject to viability assessment, and has not been subject to independent scrutiny). They suggested that Modifications [X9], [B29] and [D-A10] relating to Policy INF01 provided examples of where this may be the outcome of the proposed changes. • They also noted that the Regulation 14 draft Plan preceded the first consultation on the Strategic Masterplan SPD, and that the Regulation 16 draft Plan was published ahead of the adoption of the SPD. They suggested that neither draft referred to the Strategic Masterplan SPD in the list of documents that were said to have informed their content. They suggested that, if the SPD has subsequently influenced the Plan, as now proposed to be Modified, they suggested that the Forum may need to: set out explicitly the content of the Neighbourhood Plan as Modified that is now based on the SPD; incorporate that content from the Strategic Masterplan SPD into the Neighbourhood Plan; and subject that content to consultation and potentially Examination.

RESPONDENT	SUPPORT / OBJECT / COMMENTS
	<ul style="list-style-type: none"> • They suggested that this could be avoided simply by ensuring that the Modifications did nothing more than demonstrate alignment (or otherwise), and did not inadvertently imply greater status to the SPD than they should. They suggested some alternative drafting in their comments in relation to Modification [X9] which they considered should avoid this procedural risk. • Avison Young made representations in relation to a number of the (proposed new) policy wordings or the wordings of the justification text or suggested other amendments or made other comments in relation to the following (proposed new) policies: <ul style="list-style-type: none"> • ENV01 • ENV02 • ENV03 • INF01 • INF02 • INF03 • INF04 • HAS01 • HAS02 • HAS03 • HAS04 • URB01 • URB03 • URB04 • LHC01 • LHC02 • EMP02 • In addition, they made representations in relation to a significant number of additional proposed modifications. • They also objected to ‘Aspirations’ boxes being added beneath ENV03 [D14] and [D15]; HAS04 [D29]; LCH01 [D39]; LCH02 [D42] and EMP01 [D51].
Environment Agency	<ul style="list-style-type: none"> • They noted the proposed amendments include the removal of references to the East Midlands Hub Station. However, there remains the possibility of a new (not HS2-related) train station and for that

RESPONDENT	SUPPORT / OBJECT / COMMENTS
	<p>reason the flood risk related comments made in their letter dated 22 July 2022 remained valid.</p>
Historic England	<ul style="list-style-type: none"> • General advice included.
Nottinghamshire County Council	<ul style="list-style-type: none"> • They noted that they continued to be supportive of the Neighbourhood Plan, and as indicated in their Regulation 16 response and the discussions at the Hearing, considered that the Neighbourhood Plan's strategic ambitions were well-aligned with the adopted Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document (SPD). The County Council generally welcomed the changes proposed to the Neighbourhood Plan, in particular the reference to the adopted SPD in the newly proposed INFO1 policy and increased reference to the SPD throughout. • They wished to echo the concern raised by the DevCo in relation to Figures 9.3 & 14.1. Although noted as indicative, to reduce uncertainty, they recommended that the diagram should reflect the Movement Framework Plan (Figure 23) in the SPD, particularly given the alternative route indicates it would pass through land associated with the water treatment works and George Spencer Academy. Ultimately, the details of alignment would need to be discussed at future consultations should a proposal for a NET tram extension come forward. • They noted that they would welcome any further text within the Neighbourhood Plan to state that continuing discussions would take place with relevant partners over the most appropriate and advantageous alignment.
Oxalis on behalf of Bloor Homes	<ul style="list-style-type: none"> • They offered support for the principle of residential development north of the tram line and, noted that, as set out in previous representations, the aims and objectives of the community would be significantly better achieved with a more comprehensive approach to the Toton area, including land to north of the tram line, rather than a constrained site limited to the confines of the Toton Strategic Location for Growth site area. • They acknowledged that the 'New Green Corridors' shown on the Figure 9.1 plan are intended to be indicative only, however, they noted their view that the width shown on the plan at this scale could still appear misleading, and wider than would be realistically delivered. They therefore requested that

RESPONDENT	SUPPORT / OBJECT / COMMENTS
	<p>the width of the 'New Green Corridors' be reduced on the plan, with the word 'indicative' remaining clear on the plan.</p> <ul style="list-style-type: none"> • They recommended that the proposed walking route (shown by a blue dashed line on Figure 9.2) should include the words "indicative only" within the key. • They proposed new policy or justification text wordings or other amendments or made other comments in relation to (proposed new) Policies ENV03, INF01, HAS04, URB05, and they proposed changes to the Policies Map.
The Coal Authority	<ul style="list-style-type: none"> • They provided no further comments – other than as per their Regulation 16 response.
One member of the public	<ul style="list-style-type: none"> • They noted that the green space should remain as such and all trees behind Penrhyn Crescent West should remain to provide a green corridor from Hobgoblin Wood to Ghost House Lane and Inham Park.

2.8 Full (redacted) representations can be viewed on Broxtowe Borough Council's website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/neighbourhood-planning/chetwynd-the-toton-and-chilwell-neighbourhood-plan/>.

2.9 Broxtowe Borough Council and the Chetwynd: The Toton and Chilwell Neighbourhood Forum responded to some of the responses to the summer 2023 'additional consultation' within a letter, dated 29th September 2023. This can be viewed on Broxtowe Borough Council's website at the following link: <https://www.broxtowe.gov.uk/media/10966/bbc-cttc-letter-to-independent-examiner-september-2023.pdf>.

3.0 Further Information

3.1 If you have any questions or would like any further information in relation to the Chetwynd: The Toton and Chilwell Neighbourhood Plan, please feel free to contact the Borough Council's Planning Policy Team on 0115 917 3015 or via email at: policy@broxtowe.gov.uk.

Broxtowe Borough Council
March 2024