

**Broxtowe Borough Council
Part 2 Local Plan 2018 - 2028**

HEARING STATEMENT

Matter 6: Chetwynd Barracks (Policy 3.1)

**Statement by Oxalis Planning
on behalf of clients**

November 2018

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1.0 **Background**

1.1 Oxalis Planning Limited (Oxalis) acts on behalf of various clients within the Borough of Broxtowe. This includes Bloor Homes who has interest in land near to the HS2 Station at Toton and Westerman who has interests in land at Nuthall.

1.2 Oxalis represents clients on a complete range of sites from large scale strategic sites, to village extensions to small scale infill schemes throughout the East Midlands and nationwide. Oxalis is well placed to understand the complexity of delivering major housing schemes.

2.0 Questions

ISSUE: Whether the proposed site allocations are justified, effective and consistent with the Framework and the ACS.

Q1. What evidence is there that the site will be available, sustainable, viable and deliverable within the plan period?

The 500 homes identified for delivery within the Plan period is part of an overall capacity of for the Chetwynd Barracks site of 1,500 homes. The complexity of this development to assemble, plan and deliver the site should not be under-estimated.

The Housing Trajectory envisages homes being built and ready for occupation from 2023/2024. In other words, it assumes that the site will have been sold by the Ministry of Defence in 2021 and that just two years later, it will have been master-planned, outline planning permission obtained (with S106 agreement) and then sold to housebuilders (at least two will be needed to achieve 100 dwellings per year). Those housebuilders will have to have produce an agreement with how they work together and how infrastructure will be delivered and funded. The site will need to have been cleared and decontaminated and essential infrastructure will have had to be installed to provide a cleared and serviced site. Initial phases of development will then have had to be drawn up, approved by the Council before development can all get underway. This is assuming that there will be no unforeseen constraints to delivery or that viability issues won't arise.

This is a complex site. Developments of this size, even on cleared Greenfield sites, can take 5-10 years to secure the necessary permissions, agreements and funding before dwellings can start to be constructed and sold. That is assuming that the housebuilders aren't developing other sites that diverts their attention or that there are no national economic circumstances that could slow down development. It would require a unique set of circumstances to fall into place for a site of this size and complexity to start delivering homes on a comprehensive basis just two years after it becomes available.

It is Oxalis' view that only a fraction of the 500 homes envisaged in the housing trajectory could be relied upon to be delivered during the Plan period.

Q2. *Having regard to MM2 are the Key Development Requirements appropriate and achievable?*

There are two fundamental concerns with the Key Development Requirements as set out in Policy 3.1:

- i) The number of homes proposed (500 dwellings) as part of a 1,500 home allocation is overly optimistic and unrealistic for a size of this size and level of complexity;
- ii) While it is appropriate for the highway infrastructure for the Chetwynd Barracks site to be brought forward in conjunction with the requirements for the Toton HS2 Strategic Location for Growth, there are concerns about how this will be delivered and how this affects the timing and delivery of the Chetwynd Barracks site. There has been no discussions between relevant land owners to date to ensure that this requirement can be achieved. This introduces a further layer of uncertainty about how many homes will be delivered from the allocation during the Plan period.

In addition, the requirement for delivering new facilities (school, medical facilities, retail and small scale employment development) is unclear in terms of the amount of development required and when these facilities need to be made available in the context of the wider 1,500 development (and Toton). If they are required early in the development (for instance during the Plan period), this means there will be uncertainty about how these facilities will affect timing. The same concerns apply some of the other infrastructure specified within the Key Development Requirements.

Q3. *How would a comprehensive development of the whole site be ensured? Is it sufficiently clear from the policy how this would be achieved? How would all stakeholders be involved?*

It is important that the Chetwynd Barracks site does not come forward in a piecemeal manner to ensure that all the necessary infrastructure is delivered at the correct time and to ensure quality and consistency in the overall scheme. There is a risk that the wording of Policy 3.1 would allow the first 500 homes to be proposed as a stand-alone component of the development with the remainder being dealt with separately as part of a future allocation. Modifications to this policy are required to require a comprehensive masterplan for the site, and how this relates to the requirements to link to the Toton HS2 Strategic Location For Growth site (including stakeholder engagement), to be agreed before the first phase of development is brought forward. Inevitably this will be a complex process, which adds to the concerns raised above about how many homes can be delivered during the Plan period.

Q4. *How have the recommendations of the OPUN Design Review September 2016 informed the policy?*

No comments.

Q5. *What are the site constraints, potential impacts and infrastructure requirements of the allocation and how would these be addressed? Do they create uncertainty for the delivery of the site as envisaged in the Housing Trajectory?*

The works needed to prepare the site and the infrastructure to mitigate against the impacts are likely to be complex for a brownfield site of this size in this type of location. These aspects are likely to take time to fully understand and to agree a solution that is acceptable to all parties. It is inevitable that this will create uncertainty about how many homes can be delivered during the Plan period.

Q6. *MM2 proposes an addition to the Key Development Requirements that the highway infrastructure must be considered in conjunction with the requirements for the Toton Strategy Location for Growth. What joint working / engagement arrangements are in place to progress this? What work has been done so far? Are there any significant unresolved issues? If the Toton site is delayed would there be an impact on the delivery of highway infrastructure for this site?*

Oxalis is concerned that the highway and sustainable transport infrastructure needed to secure the comprehensive development of the Toton HS2 Strategic Location for Growth along with the 1,500 homes envisaged for Chetwynd Barracks will take time to fully understand and agree. It is highly unlikely that this will be resolved in time to enable the Chetwynd Barracks site to come forward in 2023.

3.0 Conclusions

- 3.1 This is a complex site to bring forward. This complexity is multiplied by the uncertainties surrounding the delivery of the Toton HS2 Strategic Location for Growth. There is a lack of clarity about when Key Development Requirements will be brought forward or about the phasing of different elements of the scheme. There is a lack of clarity about what infrastructure needs to be secured to allow the different elements knit together.
- 3.2 The Chetwynd Barracks site represents a unique opportunity for Broxtowe to bring forward a publicly-owned brownfield site. While it is clear that the majority of the site cannot be developed during the Plan period, the Council's assumption that 500 homes will be delivered by 2028, starting in 2023, is unrealistic. Delivering 100 homes per year is only possible if the site has all the necessary permissions in place, is cleared, remediated and serviced, if there is more than one housebuilders on site ready to build and if economic circumstances do not restrict development.
- 3.3 The Key Development Requirement in Policy 3.1, as drafted, do not ensure the comprehensive development of the site and give no certainty about the phasing of when different components need to be delivered or whether essential facilities and infrastructure will be secured in this Plan period or the next.
- 3.4 In order to ensure that the Plan is sound, Policy 3.1 should be amended to require the following:
- That reference to delivering 500 homes within the plan period be deleted;
 - That reference to the 1,500 homes overall site capacity be amended to secure a minimum of 1,500 homes;
 - That reference to the quantum of infrastructure and new facilities be amended to quantify what is required to ensure the quality and sustainability of the development;
 - That the comprehensive Masterplanning of the whole site be an essential component of policy 3.1, to agree the broad development principles and quality of development, the delivery of essential infrastructure and new facilities, how the site will be phased, and how it links / integrates with the Toton HS2 Strategic Location for Growth;
 - That phases of the development be submitted in accordance with the agreed Masterplan for the site. Ideally the agreed masterplan should be agreed as Supplementary Planning Document to provide it with statutory weight.