

Broxtowe Local Plan Part 2 Examination

Representations by JLL on behalf of DIO

Main Built Up Area Site Allocations

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

Matter 6: Chetwynd Barracks

Question 1: What evidence is there that the site will be available, sustainable, viable and deliverable within the plan period?

- 1 This evidence is presented in the Statement of Common Ground (SoCG) between the Council and JLL. This statement is currently in draft. The draft SoCG covers the four issues referred to above. The evidence base for the site has been formed by both JLL and the Council, working in collaboration.
- 2 JLL has assembled a team of consultants to produce a Technical Assessment of the site. This assessment has covered:-
 - transport and movement;
 - flood risk and surface water drainage;
 - ecology;
 - air quality;
 - ground conditions;
 - utilities and services;
 - heritage; and
 - retail need and impact.
- 3 These technical statements were submitted to support representations made by JLL to the Publication Draft and were covered by a Non-Technical Sustainability Appraisal and Development Delivery Statement produced by JLL. This statement considered also market influences on both residential and employment.
- 4 A Vision for Development, produced by master planner and architect PRP for JLL, supported this submission. This document provided an analysis of the site and its wider context, reviewed site constraints and opportunities, and proposed a concept master plan. The concept master plan showed how the site could be developed comprehensively and as a first phase (i.e. 500 homes).
- 5 The Council has reviewed this Technical Assessment and consulted with statutory consultees and other stakeholders on the relevant issues. In addition, the Council has produced its own evidence on viability and deliverability and consulted with JLL through the process.

- 6 With regards to the four specific issues referred to, we can comment briefly as follows:

Availability

- 7 On 24 March 2016, The Parliamentary Under-Secretary of State for Defence confirmed that a number of the DIO sites were no longer required for national defence purposes and would be sold to fund the improvement of the estate and to release land for the construction of new homes. This announcement included the Chetwynd Barracks site, Chilwell. It was confirmed by the Secretary of State for Defence on 7 November 2016, in a statement to the House of Commons, that the site is scheduled to close by 2021 and will become available for development.

- 8 The allocated site is in two ownerships. The DIO's interest accounts for 75 hectares of the allocation. The remainder (c 15 hectares) is owned by Annington Estates on a long leasehold (999 years), taking in two plots of land in the north of the allocated site. This land currently accommodates service personnel and their families in existing built accommodation. Its future is unclear once the Barracks close. The DIO has no ultimate control over the future of this land.

Sustainability

- 9 The site is very sustainable. It is brownfield and located in an established suburban location, being well connected to the area's existing communications and amenities. It is close to the strategic road, rail, tram and bus networks serving the area.
- 10 Development of the site will provide an opportunity to enhance these networks for the benefit of both the existing and new communities. New walking, cycling and bus routes will connect the site to existing local amenities and connect the existing community to new amenities. The new links created across the site will allow previously disconnected areas around the site to reconnect, providing a more legible and fully functioning neighbourhood.

Viability

- 11 In market terms, the site is located in one of the stronger residential areas of the Borough. This is confirmed by Table 5 to the Borough Council's SHLAA 2017/2018. This grades the wards most relevant to the site all as 'strong' in market terms.
- 12 The site is particularly suited for family accommodation, with a preference for three bed houses, but also some scope for flats in and around the proposed local centre and through the conversion of retained buildings (e.g. the Williams Barracks). This range of housing, and the economies of scale potentially achievable, provide a resilient basis for creating value to overcome any abnormal costs, associated with constraints of the site, and to pay for the infrastructure required to serve the site's development, both as a whole or in phases. Its ability to afford such costs should be greater than other competing brownfield or greenfield sites in the Borough that are less well located and established in respect of current infrastructure provision.

Deliverability

- 13 Following the adoption of the Local Plan, it is anticipated that the DIO will undertake further detailed master planning of the site prior to the preparation and submission of an application for outline planning permission. The DIO has already started the process of developing a master plan for the site. This has involved engagement between DIO, the Council, and the Neighbourhood Forum, and a public exhibition of the current proposals was arranged by JLL and held in October 2018.
- 14 Delivery on the site is expected to happen in phases, with the initial phase of development (for 500 dwellings) to take place on the western portion of the site (which is currently largely free from built development) and delivered within the plan period. Later phases (to the east) will be delivered beyond the plan period.
- 15 The 500 homes expected to be delivered within the plan period, and the total capacity for 1,500 homes, can be accommodated wholly on land belonging to DIO. The Vision for Development produced for DIO to support the allocation of the site and form the basis for consultation with the Neighbourhood Forum has assumed that the Annington land may not be available. However, it also shows how the Annington Land could connect with the proposed development.

Question 2: Having regard to MM2 are the Key Development Requirements appropriate and achievable?

- 16 Yes. The Key Development Requirements have developed and evolved through reference to the technical evidence base assembled by JLL on behalf of DIO and through consultation with statutory consultees and stakeholders such as the Neighbourhood Forum.
- 17 The Key Development Requirements have taken into account issues such as:-
 - site access;
 - highways;
 - other modes of transport (e.g. buses);
 - pedestrian and cycle links;
 - wider transport initiatives;
 - retention and enhancement of green infrastructure corridors;
 - retention and enhancement of sports facilities;
 - retention of Hobgoblin Wood;
 - retention of existing mature trees;
 - SuDS;
 - primary schooling;
 - medical facilities;
 - level and mix of supporting retail and employment uses; and
 - heritage.
- 18 This approach reflects the development concept produced by PRP on behalf of JLL, as outlined in the Vision for Development, and expressly responds to comments and suggested changes made by other consultees. The latter points to the Key Development Requirements as being appropriate, whilst the former demonstrates that they are achievable.

- 19 JLL and the Council are in agreement about the overall approach and principle of the Key Development Requirements. However, there is ongoing discussion between the Council and JLL about the exact wording of three of the Key Development Requirements. These relate to the 6th, 7th and last Key Development Requirements. The 6th and last Key Development Requirements and Key Development Aspiration are considered below directly. The 7th Key Development Requirement is considered in the context of the last question to Matter 6.

6th Key Development Requirement

- 20 JLL is concerned that the current wording could be misinterpreted and that this could affect the delivery of the site unnecessarily.
- 21 There is a desire from some stakeholders for a new access road from the north in order to provide a link to the tram terminus and Park and Ride. The relative benefits of this have not been assessed as part of the Local Plan evidence base. JLL, as advised by transport consultants PBA, consider that the proposed access scheme for the DIO land would see a highway link through the site from Swiney Way to Stapleford Lane, and comprehensive walk, cycle and bus routes across the site, and this should prove sufficient to accommodate the proposed development. This proposed access scheme would link to the existing highway infrastructure to provide access to both the Toton and Inham tram stops, the Park and Ride, the wider Toton Strategic Location for Growth. It would also help to meet the principal objectives of the County Council; namely,
- help to distribute the traffic load of the proposed development;
 - allow other local traffic to redistribute and permeate onto the local road network; and
 - avoid intensification of traffic at key congested junctions (e.g. the junction of Banks Road, Swiney Way and Stapleford Lane).
- 22 A Technical Note, produced by PBA in August 2018 and shared with the Council and the Neighbourhood Forum in September 2018, is appended (**Enclosure No. 1**). This gives an explanation and rationale of the proposed transport strategy, both for the Local Plan period (i.e. covering the first 500 houses) and beyond (i.e. the full site development of 1,500 houses).
- 23 The essential position is summarised in paragraph 1.3.2 of PBA's Technical Note. A new access from the north is not required to make the scheme work within the plan period. In addition, PBA considers that such a link has not been shown to be a pre-requisite for the full development of the site.
- 24 Nevertheless, JLL agrees that at this stage an allowance should be made in the Key Development Requirements for the possibility of such a link, so that it can be explored further. However, DIO has no ultimate control over the Annington land, nor the land further to the north that separates the Annington land and the tram terminus and Park and Ride. As such, it is important that the wording to this Key Development Requirement is as clear as it can be so that it places no obligation on the DIO – the principal landowner to the allocated site – which could render the site undeliverable. The suggested amendment seeks to retain the proposed approach, but limit the requirement to the safeguarding of land within the allocated area (including operational land within DIO's

control) to allow for its future provision, if deemed to be either necessary or beneficial, and on the basis that it can be delivered by the LPA or others.

Last Key Development Requirement

- 25 JLL considers the wording to this Key Development Requirement is too prescriptive and not supported by the Heritage Assessment undertaken by JLL, nor the approach advised by the Framework. Instead, the wording should require a Heritage Statement to be submitted with any future planning application which sets out the significance of the site and identifies any potential non-designated heritage assets. Where it is not possible to retain specific non-designated heritage assets (for example, for reasons of viability), retaining the memory of historic buildings can be achieved also in other ways, in addition to built form, such as landscaping.

Key Development Aspiration

- 26 This aspiration, which seeks to mitigate highways impact on the wider road network so that congestion is not made worse than currently exists, does not conform with the approach set out by the Framework. The Framework (para 32 – 3rd bullet point) refers to “*development should only be prevented or refused on transport grounds where the cumulative impacts of development are severe*” in the context of plan-making and decision-taking. The proposed approach sets the bar too high in terms of its requirement for highways mitigation.
- 27 In addition, it takes no account of the availability and opportunity of the utilisation and optimisation of other more sustainable modes of transport, which could positively benefit both development and existing travel needs. The 1st bullet point to para 32 of the Framework refers to plans and decisions taking account of whether “*the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure.*”
- 28 The suggested amendments to the wording of these Key Development Requirements and Aspiration are set out in the draft SoCG.

Question 3: How would a comprehensive development of the site be ensured? Is it sufficiently clear from the policy how this would be achieved? How would all stakeholders be involved?

- 29 Whilst only 500 houses will come forward during the plan period (i.e. up to 2028), both the evidence base and Key Development Requirements for the policy have been constructed on the basis of the development of the whole site. The evidence base produced by JLL has looked at the development of the whole site. The resulting Vision for Development considers the site as a whole, but also identifies how a first phase will come forward too.
- 30 Paragraph 3.4 to the submitted plan confirms that the Key Development Requirements relate to the site as a whole and are required to ensure that the Barracks are treated as one entity. The reason provided refers to ensuring a comprehensive and cohesive development so that future development opportunities are not compromised.
- 31 The fact that the allocation, with the exception of the Annington land which is not required for either the 500 houses in the plan period or the wider development of 1,500 houses, is

owned by one party – DIO – will help to ensure a co-ordinated and comprehensive development.

- 32 Stakeholders have already been involved in considering and shaping the future of the site. This has included the input of statutory consultees, the Neighbourhood Forum, and members of the general public. This is set out in the draft SoCG.
- 33 A public exhibition was held on the potential development of the site in October. The panels to the exhibition are appended as **Enclosure No. 2**.
- 34 The exhibition was held on 18, 19 and 20 October 2018 at three different local venues. It was very well attended, with over 650 attendees. The opportunity to consult runs to 18 November 2018. 176 of those who attended completed forms at the exhibition itself. Subsequently, a further 34 forms have been completed, making a total of 210.
- 35 At the time of drafting this statement, the response to the top level question *“Please tick one box that most accurately reflects your views”* was broken down as follows:-
- 9.0% respondents fully support the proposals for the redevelopment of Chetwynd Barracks;
 - 41.9% respondents broadly support the proposals for the redevelopment of Chetwynd Barracks;
 - 26.2% respondents undecided about the proposals for the redevelopment of Chetwynd Barracks;
 - 20.5% respondents do not support the proposals for the redevelopment of Chetwynd Barracks; and
 - 2.4% of respondents did not provide a response.
- 36 Over half of the respondents are either fully or broadly supportive of the proposals. Given the proposed scale of the development, this is positive recognition that the site should be developed for the proposed land uses, and in the manner shown, once it is no longer required for military use.
- 37 JLL will continue to work with all parties in developing the proposals prior to the submission of a planning application. This will include a detailed review of all the responses to the principal issues raised by respondents at the public exhibition. This includes issues such as transport, heritage, public open space, recreation, amenity, social infrastructure, and the mix of housing.

Question 4: How have the recommendations of the Opun Design Review September 2016 informed the policy?

- 38 A summary of the Opun review is provided in the draft SoCG. It was expressly taken into consideration by PRP in producing its Vision for Development and by the Council in drafting the Key Development Requirements.
- 39 The Executive Summary to the Opun review refers to a number of issues or development opportunities which have been picked out by the Key Development Requirements. These include:-

- assessment of historic assets and potential redevelopment of existing buildings for residential use;
- connectivity and movement plan, with particular respect to a legible network of pedestrian and cycling routes through the site;
- opening up of bus routes;
- opening up the Chetwynd Road entrance and other access points to link in with the adjoining areas;
- a landscape strategy linking connectivity and open spaces;
- retention and enhancement of existing landscape features, such as Hobgoblin Wood and the playing fields; and
- optimisation of landscape assets such as the Memorial Gardens and existing boulevards of mature trees.

Question 5: What are the site constraints, potential impacts and infrastructure requirements of allocation and how would these be addressed? Do they create uncertainty for the delivery of a site as envisaged in the Housing Trajectory?

- 40 These are identified and set out in the draft SoCG. Essentially, they have been identified by the Technical Assessments undertaken by PBA and JLL and carried forward into the production of the Vision for Development. These assessments are listed also in the response to Question 1 above.
- 41 The Council has also consulted on these specific issues with statutory consultees and other principal stakeholders. The Consultation Statement – July 2018 summarises the representations made and the changes to policy requested by the consultees and then provides the response of the Council in addressing the specific constraints, impacts and infrastructure requirements through the submitted changes to the policy and, specifically, the Key Development Requirements.
- 42 The capacity for development of the site has been assessed by taking these into consideration. For example, the proposed scale of development – both for the whole site and the first phase – has assumed that over 40% of the site will be retained as public open space for formal and informal recreation. In addition, a range of densities and a mix of residential accommodation, including the conversion of some existing buildings into apartments (e.g. Williams Barracks), in line with market expectations and consistent with the characteristics of surrounding area, have been assumed to ensure the identified capacity of the site is realistic.
- 43 The Housing Trajectory envisaged takes in the first 500 houses. The Vision for Development identifies this being located in the western third of the site. This area is 25 hectares in size. Allowing for over 10 hectares of infrastructure (including 7 hectares for landscape, woodlands and SuDS), a net developable area of circa 15 hectares can generate over 500 houses at a relatively low density of 34 houses per hectare. This could include the first phase of the local centre.
- 44 The western third of the site is accessible from the south, west and north and is used far less intensively by previous and current operations. Its infrastructure requirements, particularly for highways, are not major. That is because existing services are in place, as the site is surrounded by existing development, and the proposed development requires generally their reinforcement rather than their introduction.

- 45 Highway improvements are likely to be fairly minor in the first instance (i.e. to serve the first 500 houses). This is for four reasons:-
- the maturity of the road networks serving the local area;
 - the ability to use and upgrade existing access points;
 - the increase of traffic on the highway network will be factored down by the current operation (i.e. current traffic levels will be ‘netted off’), and
 - the potential for high utilisation of other modes of transport, given the range of choice of public transport options (i.e. train, tram and buses) serving the wider area, will improve the provision of these modes for both new and existing communities.
- 46 For these reasons, off-site highways improvements to serve the first 500 houses will probably be restricted to re-opening and enhancement of the access to Stapleford Lane, the creation of a new access from Airedale Close (from the north and principally for buses, pedestrians and cyclists), and the reuse and reconfiguration of accesses from Swiney Way. A through route from Swiney Way to Stapleford Lane will help to meet the County Council’s primary objectives (see paragraph 21). The first phase will also see an opening up of the site to existing bus routes which serve the area, through re-routing existing services from the north, west and south of the site.
- 47 Most of the identified site constraints (e.g. existing landscape features such as Hobgoblin Wood and buildings of heritage interest) fall in the eastern half of the site. Similarly, social infrastructure requirements such as a primary school and a medical centre are anticipated to be located in the latter phases of development.
- 48 JLL has assessed the potential development of the site on a comprehensive basis. However, it has also identified a first phase that can be delivered independently.
- 49 JLL do not anticipate site constraints, potential impacts and infrastructure requirements will be abnormally high for a development of 500 houses. Instead, for reasons given above, JLL consider that the site’s ability to sustain infrastructure costs should be relatively greater than other competing brownfield or greenfield sites in the Borough, which are less well located and established in respect of current infrastructure provision.

Question 6: MM2 proposes an addition to the Key Development Requirements that the highway infrastructure must be considered in conjunction with the requirements for the Toton Strategic 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?

- 50 Initial meetings have been held with representatives of LCR (a DfT company promoting HS2 with the remit to create and implement a strategy for growth for Toton), who are seconded to Nottinghamshire County Council to advise on the wider implications of the HS2 development on the surrounding area, including the Toton Strategic Location for Growth and Chetwynd Barracks. Subsequent meetings and dialogue are planned as JLL understands that in the event of HS2 station becoming operational in 2033, as currently projected, this will hold implications on the planning and development of Chetwynd Barracks in its latter phases. It is also understood that discussions are underway to

establish if conventional train services could be commenced at Toton earlier than HS2 services – but this is not a firm proposal at this stage.

- 51 However, JLL is also mindful that the Toton Strategic Location for Growth could be delayed (as the legislation for this section of HS2 is not complete) and that consideration should be given to delivery of Chetwynd Barracks in isolation. The Transport and Movement Strategy produced by PBA (and submitted as part of the technical evidence base to support the Vision for Development in response to the Publication Draft) assesses the likely requirements for highways and transport post 2028 (i.e. to cover the development of the remaining 1,000 houses). This post 2028 Transport Strategy features the following:-
- additional north/south and east/west routes through the site could be provided to other points of access around the site boundary, further maximising the options for connectivity and enhancing the sustainability credentials for the site;
 - an opportunity for internal linkage of the principal accesses (for all roads) to provide through routing and permeability;
 - a bus gate could be located in the eastern part of the site for vehicles accessing via Chetwynd Road;
 - the site will be stitched into the fabric of the existing settlement with a comprehensive re-routing of existing bus routes to create new north/south and east/west connections to new and existing facilities;
 - new pedestrian and cycle connections will be available on each of the site boundaries towards the surrounding area;
 - the concept master plan incorporates the section of a potential future connection to the north, towards the existing tram stop, in so far as it passes through the section of the Chetwynd Barracks' site in DIO's control; and
 - localisation will increase, as the demand for services is increasingly able to be met on site.
- 52 This combination of measures will be delivered as part of the development of the Barracks site and, hence, would contribute to the transport and movement strategy from the site whether the HS2 Strategic Growth Development comes forward or not.
- 53 For these reasons, JLL has suggested to the Council that the 7th Key Development Requirement should be amended to ensure that it refers to 'independent delivery'. In addition, following a recent Planning Appeal case (Ref No: APP/J2210/W/15314144), JLL has suggested that this Key Development Requirement makes clear that any infrastructure requirements, particularly off-site highways, should be proportionate to meet the particular residual need arising from the proposed development of the Barracks. Determining factors will include the specific existing operational characteristics of the site, the mode share to other more sustainable forms of transport (which could be high in this instance due to the connectivity to train, tram and bus), and to reflect the potentially different phasing of development of Chetwynd Barracks and the Toton Strategic Location for Growth. The proposed amendment to the 7th Key Development Requirement is set out in the draft SoCG.