

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 03 August 2022 18:15  
**To:** Policy  
**Cc:** [REDACTED]  
**Subject:** Broxtowe BC Regulation 16 Representations to the Chetwynd: The Toton and Chilwell Neighbourhood Plan  
**Attachments:** Broxtowe BC Regulation 16 Consultation Response to CTTC Neighbourhood Plan.pdf; Broxtowe BC Response Form.pdf  
**Importance:** High

Dear Sir or Madam,

I attach a copy of Broxtowe Borough Council's formal representations to the Regulation 16 Consultation of the Chetwynd: The Toton and Chilwell Neighbourhood Plan. I also attach a copy of the response form.

As noted within the Borough Council's representations, due to the complexity of the issues involved (including in relation to the two major strategic sites) and in order to allow all stakeholders a fair chance to put their case, in line with Planning Practice Guidance, the Borough Council would like to strongly recommend that the Independent Examination should include a public hearing.

I would be very grateful if these representations, along with this email, could please be forwarded to the independent examiner for their consideration.

Many thanks  
Kind regards  
[REDACTED]

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[REDACTED]  
[REDACTED]  
[REDACTED]

Broxtowe Borough Council  
Planning and Economic Development  
Chief Executive's Department  
Council Offices, Foster Avenue  
Beeston, Nottingham, NG9 1AB  
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# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	Broxtowe Borough Council
Address	Council Offices, Foster Avenue, Beeston, Nottingham
Postcode	NG9 1AB
E-mail address	<input type="text"/>

**Comments should be received by 5<sup>th</sup> August 2022**

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes ☐ No ☐ N/A

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

**[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)**

**Data Protection** - The comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.



**Please return completed forms to:**

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham,  
NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

- 1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

Please refer to accompanying report.

- 2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one) [Various – please see report]**

Support ☐

Support with  
modifications ☐

Oppose ☐

Have Comments ☐

**Please give details of your reasons for support/opposition, or make other comments here.**

Please refer to accompanying report.

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.

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

**REPRESENTATIONS MADE IN ACCORDANCE WITH REGULATION 16 OF  
THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012  
(AS AMENDED)**

**TO BE CONSIDERED BY THE INDEPENDENT EXAMINER**

**REPRESENTATIONS PREPARED BY BROXTOWE BOROUGH COUNCIL**

**JUNE 2022**

## 1.0 Introduction

- 1.1 Broxtowe Borough Council is very grateful for the very substantial amount of work that the Chetwynd: The Toton and Chilwell Neighbourhood Forum and the local community have undertaken in researching and drafting the Chetwynd: The Toton and Chilwell Neighbourhood Plan. This has clearly taken a very considerable amount of time by a large number of volunteers within the local community and the Borough Council greatly appreciates the hard work of all involved. The Plan is a very comprehensive and well-presented document, which will form the basis for helping to make important planning decisions.
- 1.2 However, in order to ensure that the full potential of the Neighbourhood Plan can be realised and that its policies do not result in adverse unintended consequences, the Borough Council would like to very strongly recommend that the wordings of some policies should be reviewed and, where necessary, clarified, through the process of Independent Examination.
- 1.3 Within these representations, the Borough Council has set out some general recommendations, as well as some concerns in relation to some policies and / or potential implications, were the Neighbourhood Plan not to be further amended or clarified.
- 1.4 The Borough Council prepared very detailed comments on the pre-submission draft of the Neighbourhood Plan and forwarded these to the Neighbourhood Forum as its response to the Neighbourhood Forum's Regulation 14 consultation. The Borough Council understands that some amendments were made in response to some of these representations.
- 1.5 The Borough Council has previously advised the Neighbourhood Forum to consider whether it would like to review some of its policies, including: at the time of the Regulation 14 consultation; during the SEA / HRA Screening Report process; and also following the publication of the government's Integrated Rail Plan (IRP), which announced that HS2 would no longer be routed through Toton and would instead terminate at East Midlands Parkway. The Borough Council also asked if the Forum would be prepared to authorise a delay to the Regulation 16 consultation to allow additional clarity to be sought in relation to some issues (including whether the disposal of Chetwynd Barracks might again be deferred as a result of any potential reassessments by the MOD in light of the war in Ukraine). The Borough Council's understanding is that the position of the Forum was that it did not wish the process to be further delayed and that any issues should instead be considered as a part of the Independent Examination.
- 1.6 The Borough Council is currently considering a number of complex issues, specially relating to the Strategic Location for Growth at Toton, following the publication of the government's Integrated Rail Plan (IRP). There is unfortunately therefore some



uncertainty in relation to some issues at the present time. The Borough Council is in the process of reviewing the draft of its Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document (SPD), following its public consultation (to comply with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)). The Council has not yet adopted this SPD; it is awaiting the outcome of technical work which is seeking to address objections (in relation to highway access onto the A52). This is potentially also of relevance to policies within the Neighbourhood Plan.

## 2.0 General Comments

- 2.1 The Borough Council is concerned that some of the wordings of some of the Neighbourhood Plan's policies are not as clear as it would be desirable for these to be, or that some of these could possibly be misinterpreted, for example, the term '*any development...*' (which could perhaps include 'householder development', but might, in some cases, be intended to only apply to 'larger' developments).
- 2.2 The Borough Council is also concerned that the 'justification text' for policies is often used not to 'justify' why a policy is needed or the rationale for it, but instead to set out additional policy 'requirements', which in some cases are not completely related to the policy requirements within the policy wording itself. A number of the policy wordings appeared to be fine, but then there are additional 'policy requirements' set out in the 'justification text' which might not be justified or might introduce additional requirements, which might not be so reasonable, or which might impact upon viability or deliverability. The Borough Council would recommend that any policy requirements should be clearly identifiable as such, so that applicants, agents and Development Management Officers are all able to easily distinguish between those elements of the policies which are 'requirements' and those which are more 'aspirational'.
- 2.3 The Borough Council is concerned that the number (and potential cost) of all of the different policy requirements within the Neighbourhood Plan could, in combination, impact upon the viability / deliverability of two of the Borough's most important development sites (Chetwynd Barracks and the Strategic Location for Growth at Toton). The Borough Council is of the view that it would be helpful if the importance of the various policy requirements could be 'ranked' so that Development Management Officers, and Borough Councillors, can better understand which 'requirements' are of most importance to the local community, and in the case that some compromises might be required, due to issues of viability, which ones the Forum would like to see 'prioritised'.
- 2.4 The Borough Council is of the view that the Neighbourhood Plan is sometimes unclear, in certain cases, as to where the responsibility for the delivery (of policies) lies, i.e. who / which organisation or applicant should be delivering the policy or is responsible for providing the relevant infrastructure. The Borough Council feels that

policy wordings could easily be slightly amended to provide a greater degree of clarity.

- 2.5 The Borough Council is concerned that some policy requirements – or requirements within the ‘justification text’ for policies are outside of the control of the Neighbourhood Forum or indeed of the LPA.
- 2.6 The Borough Council would like to suggest that some policies should be included as ‘aspirations’ only, rather than as policies, particularly where these may not be deliverable or might depend upon the actions of third parties, who may not necessarily be in complete agreement. The Borough Council notes that some of requirements set out within the ‘Policies’ section of the Plan (Section D) are also separately referred to within the earlier ‘Guidelines / Aspirations’ section of the Neighbourhood Plan (Section C). (These representations concentrate upon the ‘Policies’ section (Section D) of the Neighbourhood Plan).
- 2.7 In some cases, the Borough Council is unclear as to which specific documents (e.g. masterplans), policies of the Neighbourhood Plan are intending to refer to.
- 2.8 The Borough Council would like to seek to clarify whether the Neighbourhood Forum is seeking, through the Neighbourhood Plan, to amend the boundary of the Green Belt (towards the north of the Neighbourhood Area, north of the Toton Park and Ride site) through Policies LHC04 and LHC06 (the relocation of George Spencer Academy and the development of a new leisure centre, assuming that these policies are ‘deliverable’), as indicated on the Policies Map. The Borough Council would also like to be reassured as to whether appropriate public consultation has been undertaken in relation to this issue, for example, as a part of the Regulation 14 consultation.
- 2.9 The Borough Council would also like to seek assurances that the Environmental Statement, produced by AECOM, following the Borough Council’s Screening Report determination that a Sustainable Environmental Assessment (SEA) would be required, is sufficient to meet the requirements of the relevant Basic Conditions.
- 2.10 The Borough Council would like to clarify whether the major landowner, Annington Homes, responded to any public consultation exercises (including the Regulation 14 consultation) in relation to part of their land being used for a link road. (The Consultation Statement appears to indicate that Annington Homes did not respond to the Regulation 14 consultation). The Borough Council is making enhanced efforts to try to contact this landowner in relation to the Regulation 16 consultation.
- 2.11 The Borough Council understands that the Neighbourhood Forum has commissioned / produced a ‘masterplan’ (or masterplanning work) for the area. The purpose of this work is at this stage unclear. The Planning Policy Team of the Borough Council has not had sight of this work and so would be concerned were this to link to any part of the Neighbourhood Plan, including the Proposals Map, were this

to not have previously formed a part of the Regulation 14 consultation (as the Borough Council would be concerned that it might not yet have been subjected to appropriate public consultation, necessary to accord with the 'Basic Conditions').

2.12 The Borough Council's GIS Officer produced the 'Policies Map' for the Neighbourhood Forum, along with a number of other plans for inclusion in the main Neighbourhood Plan document. One of the sources for this mapping was the masterplanning work referred to within paragraph 2.11 above. However, at the request of the Neighbourhood Forum, this masterplanning work was not shared with the Borough Council's Planning Policy Team and so this Team has not had sight of these documents. The Borough Council is seriously concerned about the potential for legal challenges if not all of the supporting information / policy proposals have been subjected to thorough processes of public consultation.

2.13 Due to the complexity of the issues involved (including in relation to the two major strategic sites) and in order to allow all stakeholders a 'fair chance' to put their case, in line with Planning Practice Guidance, the Borough Council would like to strongly recommend that the Independent Examination should include a public hearing.

### 3.0 Comments on Specific Policies

3.1 Broxtowe Borough Council would like to make some more specific comments and suggestions in relation to some policies within the Neighbourhood Plan. The Borough Council has not commented on all of the Neighbourhood Plan's policies or all potential issues. Therefore, the Borough Council would also like to refer the Independent Examiner to the Borough Council's representations made to the Regulation 14 consultation.

3.2 The Borough Council would like to refer the Independent Examiner to its comments in relation to the following policies.

NEIGHBOURHOOD PLAN POLICY	BROXTOWE BOROUGH COUNCIL COMMENTS AND OBSERVATIONS
<p><b><u>ENV01</u></b></p> <p><b>Toton Fields LNR, Hobgoblin Wood, Memorial Garden, Ghost House Lane, Manor Farm Recreation Ground, Inham Nook Recreation Ground and Chetwynd Barracks Playing Fields will be designated as Local Green Spaces [I] in the Area to assure their long-term protection.</b></p>	<p>Broxtowe Borough Council notes that the justification text for the policy states: <i>'Additional green spaces in the Area (such as the quarry area within Chetwynd Barracks), along with the new green spaces created under ENV03, will be assessed during the Plan period. Where appropriate, these will be designated as Local Green Spaces. Once designation has been conferred, proposals to improve their biodiversity will be expected as part of the required net gain by NPPF para 8c'</i>.</p> <p>It is the Borough Council's understanding that additional areas of Local Green Space could</p>



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<p><b>In addition, other green spaces may be designated during the Plan period.</b></p>	<p>normally only be designated through a formal review of the Neighbourhood Plan, which would involve a repeat of many of the stages of the Neighbourhood Plan process starting with the Regulation 14 consultation, and depending upon the views of a future independent examiner, a new independent examination and referendum might be required.</p> <p>[The Borough Council would like to suggest that the text in red could be deleted from the policy along with some parts of the justification text].</p>
<p><b><u>ENV02</u></b></p> <p><b>Any development in the Area which increases or is likely to increase the use of existing green space, including Toton Fields LNR, or existing/potential rights of way (including footpaths on the ridge line east of the River Erewash) should pay an appropriate contribution to enhance these green spaces. This will facilitate their increased use and improve the network of green spaces enabling their multifunctional use.</b></p>	<p>The Borough Council is of the view that it would be useful to clarify which types of development the policy is intended to apply to and also to clarify what is meant by the word 'appropriate'.</p> <p>The Borough Council is concerned that there may be additional policy requirements within the justification text, some of which are not directly related to the policy wording.</p> <p>There is also reference to 'HS2 mitigation measures' and the 'East Midlands Hub Station' which, based upon the IRP, may no longer be relevant.</p>
<p><b><u>ENV03</u></b></p> <p><b>Establishment of new blue/green infrastructure in the Strategic Location for Growth (SLG) should be in line with the Aligned Core Strategy policy and should incorporate two new linear features which will contribute green space as both corridors and accessible natural green space. These green spaces need be of significant</b></p>	<p>The Borough Council is concerned that the justification text for the policy introduces additional 'requirements' (including specific 'widths' for the new green corridors). If these are 'requirements' then the Borough Council would prefer that these be included within the policy wording.</p> <p>It is unclear to the Borough Council as to whether or not these 'widths', as set out within the justification text would be viable / deliverable.</p>

NEIGHBOURHOOD PLAN POLICY	BROXTOWE BOROUGH COUNCIL COMMENTS AND OBSERVATIONS
width/area to accommodate their multifunctional use.	
<p><b>ENV04</b></p> <p><b>Prior to any development of Chetwynd Barracks, four new GCs and three new green spaces (as detailed below) should be incorporated within the relevant masterplan.</b></p>	<p>The Borough Council is unclear what the 'relevant masterplan' refers to. Would this be the Toton and Chetwynd Barracks Strategic Masterplan SPD? The Borough Council would like to question whether it might be better to state that the green corridors and spaces should actually be 'provided' as a part of the development, particularly as the Toton and Chetwynd Barracks Strategic Masterplan SPD might be adopted prior to the Neighbourhood Plan being 'made' (if successful at referendum)?</p> <p>A similar issue as with Policy ENV3 applies, in that the justification text appears to introduce additional 'requirements' (including specific 'widths' for the new green corridors). If these are 'requirements' then the Borough Council would prefer that these are included within the policy wording. It is again unclear as to whether or not these 'widths' would be viable / deliverable.</p> <p>The justification text would appear to be an 'extension' of the policy wording. The 'actual' justification text would appear to start with the text 'Further justification for ENV03 and ENV04'?</p>
<p><b>ENV05</b></p> <p><b>Clear arrangements for the long-term maintenance and management of new green space assets to be agreed with the Council prior to development being undertaken. Any development within Chetwynd Barracks shall either pay a contribution or undertake works to create, maintain and manage the Memorial Garden which will become the focal point for the wider community.</b></p>	<p>The Borough Council would like to clarify whether (only) the first part of the Policy applies to all parts of the Neighbourhood Area (i.e. the SLG, Chetwynd Barracks and any other areas / new developments)?</p>
<p><b>ENV06</b></p>	<p>The Borough Council is of the view that it would be useful to include a definition of what a 'mature' tree is to avoid any confusion. The justification</p>

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<p><b>Development should not involve the removal of mature trees including TPOs, veteran and ancient trees. Development should seek to minimise the loss of other trees. Habitat lost to development must be replaced by equivalent species plus the necessary biodiversity gain.</b></p>	<p>text again appears to include additional policy 'requirements', such as the need for consultation with the community in relation to the locations for 'replacement' trees. Part of the justification text could arguably be an 'aspiration', as only the LPA can make TPOs. It is not clear who would be proposing the additional TPOs (the Forum, anyone in the local community, etc.) and the Borough Council is of the view that it would be useful to clarify that it would be the responsibility of the LPA to assess (in line with criteria set out in legislation) whether TPOs should be made.</p> <p>The Borough Council would note that the policy could, arguably, lead to 'most' trees being protected in the same way as trees subject to TPOs. It could also potentially cover all types of development, including householder development (although a residential applicant could presumably cut any trees down first and then apply for planning permission).</p> <p>The Borough Council also notes that, in the justification text, there is reference to the 'significant loss of trees to the East Midlands Hub Station development'; it is unclear if, following the IRP, this is still relevant?</p>
<p><b>ENV07</b></p> <p><b>Any development within the Area should be supported by a green landscaping plan including infill and green boundaries which should, where possible, include the planting of native species and the creation and improvement of wildlife habitats in line with at least a 10% biodiversity gain (using the DEFRA metric).</b></p>	<p>The Borough Council would like to clarify whether the term 'any development' would indeed include any development, e.g. does this include 'householder development, e.g. extensions, outbuildings etc.?</p> <p>The justification text appears to include policy 'requirements'. The first sentence of the justification text states:</p> <p><i>'Any development within the Area should be refused unless it is demonstrated it will conserve and enhance designated or candidate areas for local nature reserves, local wildlife sites, candidate or designated Tree Preservation Orders (TPOs).'</i></p> <p>The Borough Council is not clear what 'candidate' areas / TPOs would include, as this could apply to all areas of green space and all trees, anywhere</p>



NEIGHBOURHOOD PLAN POLICY	BROXTOWE BOROUGH COUNCIL COMMENTS AND OBSERVATIONS
	within the Neighbourhood Area? It is also not clear who would be responsible for 'determining' whether something would be a 'candidate' or not (the LPA?).
<p><b>ENV08</b></p> <p><b>Any development should ensure that it has a positive impact on connectivity between ecological assets such as LNRs, SSSIs, LWSs, and green spaces beyond the Neighbourhood Area boundary.</b></p>	<p>The Borough Council is unclear as to how applicants would necessarily be able to comply with this policy and would welcome some clarification.</p>
<p><b>INF01</b></p> <p><b>An Infrastructure masterplan, detailing proposals to manage increased traffic from both within the Area as well as known new developments near to the Area will need to be produced before development starts.</b></p>	<p>The Borough Council would like to seek some clarifications, including how the word 'near' would be defined.</p> <p>The policy wording does not state 'which' development it refers to, although the justification text does refer to the SLG and Chetwynd Barracks. It is unclear what other developments it would need to take account of.</p> <p>The Borough Council would like to clarify who (which organisation / owner / applicant etc.) would be responsible for the production of the infrastructure masterplan. It is unclear whether or not this policy is referring to the Toton and Chetwynd Barracks Strategic Masterplan SPD – which could be adopted prior to the Neighbourhood Plan being 'made' (if successful at referendum)?</p>
<p><b>INF02</b></p> <p><b>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. This should link to the new road infrastructure being developed for the new East Midlands Hub Station.</b></p>	<p>The policy wording states that a north-south primary access road is required, but it does not state who would be required to provide it or how it should be funded. Further clarity would be welcomed.</p> <p>The policy notes that this should link to the new road infrastructure being developed for the new East Midlands Hub Station. However, if the East Midlands Hub Station does not proceed (following the IRP publication), it is not clear as to whether this remains relevant.</p>

NEIGHBOURHOOD PLAN POLICY	BROXTOWE BOROUGH COUNCIL COMMENTS AND OBSERVATIONS
<p><b>INF03</b></p> <p><b>Provision of new, dedicated cycle routes (off - road and separated on-road) through the Area will be required. Separated lanes should be included within new green corridors (see ENV03 and ENV04).</b></p>	<p>The Borough Council would like to clarify who would be responsible for providing these routes or whether this is an aspiration?</p>
<p><b>INF04</b></p> <p><b>Cycle lanes should be direct and separated where possible from motor vehicles when on road on key routes through the Area especially those leading to the East Midlands Hub Station.</b></p>	<p>The Borough Council notes that some issues such as the design of highways and highway standards are the responsibility of the County Council.</p> <p>There is a question as to whether reference to the East Midlands Hub Station is still appropriate and also whether much of the justification text is now relevant / appropriate.</p>
<p><b>INF05</b></p> <p><b>Proposals to reduce levels of traffic congestion and pollution, as well as improve safety at the key locations, are expected due to the traffic growth arising from the development of Chetwynd Barracks and the SLG.</b></p>	<p>The 'key locations' are described within the justification text not the policy and cover many of the main highways of the Neighbourhood Area.</p> <p>The Borough Council notes that issues such as highway safety and congestion are the responsibility of the County Council (and National Highways in the case of the A52). The County Council / National Highways would need to advise on the locations where improvements would be required.</p> <p>National Highways submitted an objection to the Borough Council's Toton and Chetwynd Barracks Strategic Masterplan SPD Regulation 13 consultation, specifically in relation to access onto the A52 dual carriageway. Technical work is ongoing to try to address these concerns.</p>
<p><b>INF06</b></p> <p><b>East Midlands Hub Station parking should not be allowed on residential streets, especially to the west of Stapleford Lane.</b></p>	<p>The Borough Council notes that, following the publication of the government's Integrated Rail Plan (IRP), the East Midlands Hub Station may not proceed and so the relevance of the policy might need to be reviewed. Notwithstanding this, this issue would be the responsibility of the County Council.</p> <p>Resident parking schemes are the responsibility of the County Council. If introduced – subject to</p>

NEIGHBOURHOOD PLAN POLICY	BROXTOWE BOROUGH COUNCIL COMMENTS AND OBSERVATIONS
	the County Council's conditions for their introduction, the Borough Council understands that these would restrict 'all' non-resident parking, not just specially rail users.
<b>INF07</b>  <b>All development of the SLG and Chetwynd Barracks should preserve, enhance and encourage re-routing of bus services through the Area.</b>	<p>In so far as this issue could be influenced by the Neighbourhood Plan, the word 'and' [i.e. 'enhance and encourage'] could potentially be replaced with either 'or' or 'and / or'.</p> <p>There are again additional policy 'requirements' within the justification text.</p>
<b>INF08</b>  <b>New developments should provide adequate levels of parking to minimise on-street parking.</b>	<p>The Borough Council would like to clarify how the word 'adequate' would be defined. (There appears to be no policy / guidance in terms of numbers of spaces required either within the policy or justification text).</p>
<b>INF09</b>  <b>Development proposals that make use of or apply appropriate technological solutions to reduce travel demand (car sharing, car clubs) and demand-responsive public transport, will be supported.</b>	<p>The justification text notes that '<i>Particular attention should be given to links to other modes of transport, such as the tram stop at Toton Lane and the East Midlands Hub Station with its fast connections to Nottingham, Derby and beyond</i>'. This could perhaps be reviewed in light of the IRP.</p>
<b>HAS01</b>  <b>In new developments of more than ten homes, at least 30% of properties should be 'Affordable'. This target should include a mix of 'Affordable to Rent' and 'Affordable to Buy'. Developments should ensure that the Tenure Mix meets the future needs of Residents within the Neighbourhood Area whilst recognising the present proportions in the Neighbourhood Area of 75% Owner Occupied (including shared ownership), 11.5%</b>	<p>In terms of the 'tenure mix', there could be a difference of position between the policy wording and the justification text – as the requirement within the policy wording is slightly different to that as expressed within the justification text. The Borough Council would welcome some clarity in relation to this.</p>



NEIGHBOURHOOD PLAN POLICY	BROXTOWE BOROUGH COUNCIL COMMENTS AND OBSERVATIONS
<p><b>Affordable Rented and 13.5% Market Rented homes.</b></p>	
<p><b>HAS02</b></p> <p><b>In all developments on Chetwynd Barracks and the Strategic Location for Growth (and elsewhere in developments of 10 homes or more), the number of new dwellings should be such that the number of all dwellings of all sizes (new and existing) meets the future needs of residents in the Area. Developers should ensure that there is adequate provision of smaller homes (with fewer bedrooms) and bungalows to provide a dynamic housing market and encourage both first-time buyers and last-time buyers. Development proposals should provide a mix of housing types and sizes as outlined. However, where justified by new evidence during the Plan period, variation to the housing mix will be considered by the Neighbourhood Forum in future.</b></p>	<p>It is not entirely clear where the 'mix of housing types and sizes' is outlined?</p> <p>The Borough Council would like to understand when the 'variation' to the housing mix would be considered by the Neighbourhood Forum. Would this be at a formal review of the Plan or would this be within any consultee response to a planning application?</p>
<p><b>HAS06</b></p> <p><b>The Building Regulations Part G (2010) include an optional mains water consumption target of 110 litres per person per day. Unless not feasible or viable to do so, buildings should be designed to meet that target, or the most stringent target set in any superseding regulations.</b></p>	<p>The Borough Council notes that it could be difficult to enforce this policy in relation to 'refurbishments', as these would not necessarily, in all cases, require planning permission.</p> <p>The Borough Council notes that it could be useful to set out what the Building Regulations Part G (2010) require, as many applicants (including householders / custom / self-builders etc.) may not be aware of this.</p>

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<p><b>Water Efficient Fittings should be included in all refurbishments and any new developments to achieve a lower overall water consumption.</b></p>	
<p><b>HAS07</b></p> <p><b>Developers should demonstrate how they intend to minimise on-site construction times by the use of Modern Methods of Construction (MMC) building techniques, such as Modular Homes. Innovative use of MMC such as modular housing will be strongly supported.</b></p>	<p>The Borough Council notes that the justification text refers to 'circa 4,000 homes and workplaces for 10,000 people'. These figures may or may not be accurate. A decision in relation to housing numbers will be made as a part of the Greater Nottingham Strategic Plan process (the review of the Broxtowe Aligned Core Strategy). A 'preferred approach' has not yet been developed in relation to the acceptable level of growth for these sites. The Sustainability Appraisals for these sites, as a part of the Greater Nottingham Strategic Plan process, is also ongoing at the current time.</p>
<p><b>URB01</b></p> <p><b>New residential developments should, wherever possible, have access to private external space. If not possible, access to nearby communal space should be available. The design of new developments should minimise overlooking.</b></p>	<p>The Borough Council notes that the justification text introduces additional policy requirements, e.g.: <i>'This will normally comprise a back garden and a front garden. For development of new apartments, this will normally comprise a private external balcony or a roof terrace, both options including sufficient space for two or more people to sit'</i>. The requirement in relation to balconies could, potentially, be inconsistent with the requirement in relation to 'overlooking'.</p>
<p><b>URB03</b></p> <p><b>In new developments over 10 units, street layout and design should meet the needs of all users, including providing safe space for children, pedestrians and cyclists.</b></p>	<p>Would the threshold as set out in this policy be '11+ units' (i.e. 'over 10 units') as per the policy wording or '10 or more units' (to ensure consistency with other policies, e.g. Policy HAS02)?</p> <p>The justification text includes additional policy requirements, e.g.: <i>'Additionally, on- or off-street parking provision should include cycle parking and electric vehicle charging points' and green space standards'</i>. Should this be included as a part of the policy?</p>
<p><b>URB05</b></p>	<p>There are references in the justification text to the 'East Midlands Hub Station', including in relation to retail outlets: '....• <i>Other retail outlets will serve</i></p>

NEIGHBOURHOOD PLAN POLICY	BROXTOWE BOROUGH COUNCIL COMMENTS AND OBSERVATIONS
<p><b>Proposals for the Toton Innovation Campus (the ‘Campus’) can include a mix of buildings which integrate business, residential and retail opportunities both as separate buildings and as combined buildings with commercial offices and apartments integrated in a single structure.</b></p>	<p><i>the needs of commuters travelling to/from the Hub Station’, which might no longer be relevant, as a result of the IRP.</i></p>
<p><b>LHC01</b></p> <p><b>Proposals to develop two neighbourhood-scale, pedestrian-friendly retail centres will be encouraged. One preferably next to the Memorial Gardens in the Barracks to provide a focus for the retail centre and a ‘heart’ for the new community. With the other situated within the development west of Toton Lane. See also policy EMP05.</b></p>	<p>The Borough Council notes that the policy wording appears to be very similar to Policy EMP05, although Policy EMP05 appears to require the provision of a plaza-style neighbourhood retail centre in Chetwynd Barracks and would strongly support it being at the Memorial Gardens and the provision of another to the west of Toton Lane, whereas Policy LHC01 just encourages proposals for two neighbourhood-scale pedestrian-friendly retail centres. Therefore, there are inconsistencies between the two policies.</p>
<p><b>LHC02</b></p> <p><b>Development of the Barracks should respect its heritage and seek to conserve/re-purpose its significant assets where feasible. New developments are required to preserve, and where possible, enhance the historic significance of these assets. There is a presumption in favour of their protection and/or re-purposing for public benefit.</b></p>	<p>The Borough Council notes that the justification text includes a ‘policy’ to ‘locally list 18 buildings’ as set out within Appendix 2 of the Plan. The Borough Council also notes that one of these buildings, ‘Building 157’ is extremely large (circa 40,000 sq. m in size, according to initial BBC (Policy Officer) estimates). The Borough Council is concerned that this could have significant implications in relation to viability / deliverability of the site.</p> <p>It is unclear as to how the terms ‘re-purposing’ and ‘public benefit’ might be defined or what these might include.</p> <p>The justification text also notes:</p> <p><i>‘It needs to be noted that the tunnels have not been fully assessed, so should be treated as a ‘local hazard’ that requires further investigation</i></p>

NEIGHBOURHOOD PLAN POLICY	BROXTOWE BOROUGH COUNCIL COMMENTS AND OBSERVATIONS
	<p><i>before decisions can be made as to their future role/purpose'. The Borough Council would like to clarify whether this would be included during a 'formal review' of the Neighbourhood Plan.</i></p>
<p><b>LHC04</b></p> <p><b>George Spencer Academy is expected to manage the large increase in pupils arising from the additional homes being built in the Area. It is anticipated that the Academy will need (and should be encouraged) to develop plans to expand capacity as the configuration of the current site is unlikely to meet demand. Relocation of the Academy adjacent to the new leisure centre (see LHC06) is the preferred option and will be supported.</b></p>	<p>The Borough Council is of the view that it would be the responsibility of the Local Education Authority (LEA), Nottinghamshire County Council (NCC) to manage any increase in pupils and seek developer contributions as appropriate. Ultimately, these decisions would need to be taken by the LEA (NCC).</p> <p>It is unclear as to 'which organisation' the '<i>should be encouraged</i>' text is aimed at (i.e. should be encouraged by the Forum or LPA or LEA etc.?).</p> <p>Please also refer to the Borough Council's comments in relation to the Green Belt (paragraph 2.8).</p>
<p><b>LHC05</b></p> <p><b>Provision of a primary school and new medical facilities (both needed to meet forecast demand) will be strongly supported.</b></p>	<p>The Borough Council notes that the policy does not appear to refer to a site / location. The justification test appears to refer to Chetwynd Barracks but there is no mention of the Strategic Location for Growth at Toton site?</p>
<p><b>LHC06</b></p> <p><b>A new Leisure Centre should be built in the Area to cope with demand for leisure services arising from increased residential population as well as the significant numbers expected to be working at the Innovation Campus.</b></p>	<p>The Borough Council is not clear who this policy is 'aimed' at (e.g. which developers, the LPA etc.). It is noted that this has also been referred to as an 'aspiration' in the previous section of the Neighbourhood Plan. Please also refer to the Borough Council's comments in relation to the Green Belt (paragraph 2.8).</p>
<p><b>LHC08</b></p> <p><b>The provision of allotments/communal gardens</b></p>	<p>There appear to be differences between the policy wording and justification text (which includes policy requirements). There is a key difference between the policy wording (which states that the provision of allotments will be</p>

NEIGHBOURHOOD PLAN POLICY	BROXTOWE BOROUGH COUNCIL COMMENTS AND OBSERVATIONS
<p><b>within easy walking distances of new homes will be supported.</b></p>	<p>'supported') and the justification text, which implies that allotments 'should' be provided.</p>
<p><b>EMP01</b></p> <p><b>The new 'Innovation Campus' should maximise employment potential. Proposals for B1 class buildings that provide significant numbers of jobs will be supported.</b></p>	<p>The Borough Council notes that the justification text states: <i>'Developments comprising mixed-use buildings that incorporate both commercial and residential uses will be particularly welcomed'</i>, which, arguably, effectively extends the policy rather than providing a justification for it.</p>
<p><b>EMP02</b></p> <p><b>Development of commercial property on Chetwynd Barracks should seek to reuse existing buildings where feasible. Proposals to locate the centre of employment zone around Building 157 will be strongly supported along with proposals to maximise the re-use of some/all of the building. Small to medium scale employment will be supported, but any proposals for a large scale industrial storage and distribution facility for Building 157 will not be.</b></p>	<p>The Borough Council notes that Building 157 is a very large MOD storage / distribution building. [Approximately, 40,000 sq. m. in size, based upon (Policy Officer) initial estimations. Please also refer to the Borough Council's comments in relation to Policy LHC02].</p> <p>The Borough Council notes that this building (Building 157) is also to be protected by Neighbourhood Plan Policy LHC02, which designates it within a 'local heritage list'.</p> <p>Given the large size of Building 157, were this building to be retained, the Borough Council is concerned as to whether this 'could' potentially impact upon the viability / deliverability of the wider site, for example, in terms of the numbers of units or densities.</p>
<p><b>EMP03</b></p> <p><b>The design and development of the commercial zones should be:</b></p> <ul style="list-style-type: none"> <li>- visually attractive and compatible with the surrounding area and include screening where necessary;</li> <li>- of a scale, design and finish appropriate to its setting, particularly where it can be viewed from high ground;</li> </ul>	<p>The Borough Council is unclear as to whether there should be some justification text for this policy?</p>

NEIGHBOURHOOD PLAN POLICY	BROXTOWE BOROUGH COUNCIL COMMENTS AND OBSERVATIONS
<p>- landscaped in a manner that retains existing trees/hedgerows and blends with nearby green spaces using new planting as appropriate.</p>	
<p><b>EMP04</b></p> <p><b>The development of a 'Centre of Excellence' for smart building technologies in the Area is strongly encouraged. Such a development provides a focus to attract leading-edge organisations to the Innovation Campus.</b></p>	<p>The justification text suggests that the 'Centre for Excellence' would include an MMC 'factory'. The Borough Council is concerned that there could be potential 'nuisances' of the industrial operations of any such facility (including noise, vibration, pollution, HGV movements etc.) which might not be entirely consistent with the proposed neighbouring uses and would welcome any assurances in relation to this policy proposal.</p>
<p><b>EMP05</b></p> <p><b>Create a plaza-style neighbourhood retail centre in Chetwynd Barracks. Proposals to create such an area next to the Memorial Gardens will be strongly supported, as will another retail centre within the development west of Toton Lane. See also policy LHC01 for the siting of the retail centre next to the Memorial Gardens as a 'heart' for the community, and also to respect its heritage and setting.</b></p>	<p>The policy wording appears to be very similar to Policy LHC01, although Policy EMP05 appears to require the provision of a plaza-style neighbourhood retail centre in Chetwynd Barracks and would strongly support it being at the Memorial Gardens and the provision of another to the west of Toton Lane, whereas Policy LHC01 just encourages proposals for two neighbourhood-scale pedestrian-friendly retail centres. Therefore, there are inconsistencies between the two policies.</p> <p>The policy refers to Policy LHC01 in relation to the 'heart' for the community and also 'heritage and setting', although Policy LHC01 does not appear to refer to 'heritage and setting' either within either the policy or supporting text?</p> <p>[To ensure consistency and to avoid confusion, the Borough Council would like to suggest that merging the two policies (LHC01 and EMP05) would appear to be worthy of consideration].</p>



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 22 July 2022 13:50  
**To:** Policy  
**Subject:** Environment Agency Response to: LT/2011/113450/OR-03/IS1-L01  
**Attachments:** PlanningProposal.rtf

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The Local Development Document has been reviewed and I enclose the Environment Agency's comments on:

Other

Broxtowe Borough Council

Other

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Broxtowe Borough Council  
Planning Policy  
Town Hall Foster Avenue  
Beeston  
Nottingham  
NG9 1AB

**Our ref:** LT/2011/113450/OR-  
03/IS1-L01  
**Your ref:**  
**Date:** 22 July 2022

Dear Sir/Madam

**Chetwynd: The Toton and Chilwell Neighbourhood Plan regulation 16 consultation**

Thank you for the opportunity to respond to the above mentioned Neighbourhood Plan and please find our comments detailed below.

**East Midlands Hub Station**

The neighbourhood plan details proposals for the hub station with suggestions for elements the group would like to see integrated into the site. The neighbourhood plan highlights aspirations for the East Midlands Hub Station to be linked to the innovation centre while also providing 'significant residential quarters'. A large portion of the area designated for potential housing falls with flood zone 3b and as such, as mentioned above residential development which is classified as 'more vulnerable' would not be suitable in this location.

As noted above while the site is linked to the proposed innovation centre the hub station does fall outside of the indicative Toton and Chilwell boundary.

In December 2021 the Environment Agency issued a response to a request for comments on the Toton and Chetwynd Supplementary Planning Document (SPD). While the SPD referenced this site as forming part of the HS2 infrastructure project the same points can be raised. A copy of our comments is pasted below for completeness. Policy 3.2 xxv) of the Adopted Local Plan Part 2 requires suitable flood risk mitigation. There does not appear to be any further details on the fluvial flood risks within the SPD.

The development areas will need to consider the implications of any future station that is planned to be situated on the site and the implications of flood risk. We note that recent announcements highlight that the HS2 station will no longer be situated at Toton and that further information is expected in the future about the plans for the site. If a future train station is proposed outside of the HS2 requirements, the following

Environment Agency  
Trent Side North, West Bridgford, Nottingham, NG2 5FA.

[www.gov.uk/environment-agency](https://www.gov.uk/environment-agency)

Cont/d..

requirements will need to be considered as well as the wider development proposals.

Development should ensure it complies with the requirements of the NPPF and the flood risk policies of Broxtowe's Local Plan. No development, other than development classified as water compatible and essential infrastructure should be allowed in areas of the site shown to be in the functional floodplain (flood zone 3b). If water compatible or essential infrastructure is proposed within functional floodplain then the development should be designed to reduce flood risk to the site and to others. Development should ensure a sequential approach is undertaken to ensure development classed as more vulnerable is located in areas of lowest flood risk throughout the sites. Development will also need to ensure that the latest climate change allowances are used as each phase of the development is brought forward.

Flood risk mitigation measures should look at opportunities to reduce flood risk both to the site and others. Flood risk mitigation should also consider multifunctional opportunities, for example providing additional wildlife habitat such as wetlands. The environment agency would welcome proposals to create space for flood waters within the development site. This could potentially include creation of flood plain storage areas or multifunctional wetland areas which also provide improved local habitat.

The Environment Agency maintains a number of raised defences within the proposed development site and adjacent to the River Erewash. Any future development must consider the impact on these defences both now and in to the future. During any construction activities and post development the environment agency must be provided unimpeded access to these flood defence assets so as to undertake our maintenance and potential future improvement works. Any works on or within 8m of the flood defences on site or the River Erewash will require a flood risk activity permit.

Development in this area should also look at opportunities to support the maintenance of the existing flood defences in the area.

### **Chetwynd Barracks**

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. Policy 3.2 xxiv) of the Adopted Local Plan Part 2 requires that the development of the site provides suitable remediation of the land. 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. Guidance on managing risks from land contamination can be found at [Land contamination risk management \(LCRM\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm)

### **Biodiversity Net Gain**

We welcome that the document highlights the opportunity to provide biodiversity net gain. The Environment Bill has now been approved through parliament requiring development to provide a minimum of 10% biodiversity net gain. Given the size of the proposed development areas we would encourage the neighbourhood plan to push for developers to provide biodiversity net gain in excess of the required 10% across these sites where possible/feasible.

## **Green Infrastructure**

We welcome that there are policies which seek to enhance or provide green infrastructure as part of development. This policy should also include mention 'blue infrastructure' as it would be beneficial to link it with green infrastructure. Development should integrate and increase blue/green infrastructure to build in multi-functional solutions to future impacts such as increased flood risks, water shortages and overheating. Blue and green infrastructure can work together to achieve these aims.

## **Sustainable design**

We are pleased to note the inclusion of reference to supporting document HAS06 within the Neighbourhood Plan which highlights a requirement for all new residential development to meet the tighter water efficiency measures of 110 litres per person per day unless it can be demonstrated that this is not feasible.

Producing mains water, treating waste water and in-home water heating has significant embedded energy and requires chemical inputs, therefore reducing water demand per capita by requiring the tighter standard of 110 l/p/d could lead to significant reductions in the associated carbon emissions.

Yours faithfully

A large black rectangular redaction box covering the signature and name of the sender.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 13 June 2022 13:34  
**To:** Policy  
**Subject:** Historic England advice on case PL00760943  
**Attachments:** \_HERef\_PL00760943\_L409259.doc

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Dear Sir/ Madam,

I am writing in relation to the following:

NDP: Neighbourhood Development Plan  
Chetwynd: The Toton and Chilwell Neighbourhood Plan  
[Case Ref. PL00760943; HE File Ref. -; Your Reference. -]

Please see the attached letter.

Yours Sincerely

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at [historicengland.org.uk/strategy](https://www.historicengland.org.uk/strategy).

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Historic England

Sir/Madam /  
Broxtowe Borough Council  
Planning Department, Council Offices  
Foster Avenue, Beeston  
Nottingham  
Nottinghamshire  
NG9 1AB

Our ref: PL00760943

13 June 2022

Dear Sir/Madam /

Thank you for your letter of 10 June 2022 regarding Chetwynd:

The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.

If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk) <<http://www.heritagegateway.org.uk>>). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.

Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-

[<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>](https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/)

You may also find the advice in "*Planning for the Environment at the Neighbourhood Level*" useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment->



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



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Historic England

[agency.gov.uk/LIT\\_6524\\_7da381.pdf](https://www.gov.uk/LIT_6524_7da381.pdf)>

If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, "Housing Allocations in Local Plans" as this relates equally to neighbourhood planning. This can be found at <https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf>>

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

[Redacted signature]



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

[Redacted]  
[HistoricEngland.org.uk](https://www.historicengland.org.uk)



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 22 July 2022 15:57  
**To:** [REDACTED]  
**Cc:** Rutter, Andrew B2 (DIO Estates-AD Prin Surv DEO AH3)  
**Subject:** Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation 16 Consultation  
**Attachments:** NOT001\_Chilwell\_COMP\_A3.pdf; NOT002\_Chilwell\_COMP\_A3.pdf; chetwynd-toton-chilwell-neighbourhood-plan-regulation-16-consultation-form.docx

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Dear [REDACTED],

Further to your e-mail dated 16<sup>th</sup> June 2022 regarding the Draft Neighbourhood Plan, I write to introduce Annington to you, set out what we do and how we hope we can work with the Council and the MoD on bringing forward those parts of the wider Chetwynd Barracks site, in which we have a 175 year leasehold interest, to support the wider objectives of the Neighbourhood Plan.

Annington are one of the largest private real estate owners in the UK. The company's objective is to accelerate the refurbishment, redevelopment for rental or sale of affordable ex-MoD homes to families who need them. We have a portfolio of over 39,000 properties , most of them rented by the MoD to provide quality, reasonably priced housing to Service Families.

Within the Chetwynd Barracks site shown on the plan at Figure 4.5 of the Neighbourhood Plan, we have a leasehold interest in two large land parcels comprising the Married Quarters Estate. Details of these land holdings are enclosed on the attached plans. Noting this substantial Annington leasehold ownership as part of the text on page 16 of the draft Plan is important to give an accurate picture of land ownership across the Barracks site.

If and until such time that the MoD advise the Married Quarters Estate is no longer needed by the MoD, then we 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 we would be delighted to work with the MoD and Council to deliver on the principles of the draft Neighbourhood Plan of which we are supportive, including the provision of 1,500 new homes.

Typically, where Married Quarter Estates are no longer required by the MoD, our 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 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.

We look forward to working with the Council and MoD in taking forward the Neighbourhood Plan. We would be delighted to meet with you either with or without the MoD in the first instance to progress,

Best wishes

[REDACTED]

[REDACTED]

n.b I have also completed the form linked on your website with these comments and attach herewith.

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# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

## Agent (if applicable)

Please provide your client's name	Annington Property Limited
-----------------------------------	----------------------------

## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	Annington Property Limited
Address	<input type="text"/>
Postcode	<input type="text"/>
E-mail address	<input type="text"/>

**Comments should be received by 5<sup>th</sup> August 2022**

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes ☐ Y No ☐

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

**[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)**

**Data Protection** - The comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

## Please return completed forms to:

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).



Please use a separate sheet of paper if required.

- 1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

General comments on the entirety.

- 2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☐

Support with  
modifications ☐

Oppose ☐

Have Comments ☐ Y

**Please give details of your reasons for support/opposition, or make other comments here.**

---

Please use a separate sheet of paper if required.



Dear Mr Dawson,

Further to your e-mail dated 16<sup>th</sup> June 2022 regarding the Draft Neighbourhood Plan, I write to introduce Annington to you, set out what we do and how we hope we can work with the Council and the MoD on bringing forward those parts of the wider Chetwynd Barracks site, in which we have a 175 year leasehold interest, to support the wider objectives of the Neighbourhood Plan.

Annington are one of the largest private real estate owners in the UK. The company's objective is to accelerate the refurbishment, redevelopment for rental or sale of affordable ex-MOD homes to families who need them. We have a portfolio of over 39,000 properties , most of them rented by the MoD to provide quality, reasonably priced housing to Service Families.

Within the Chetwynd Barracks site shown on the plan at Figure 4.5 of the Neighbourhood Plan, we have a leasehold interest in two large land parcels comprising the Married Quarters Estate. Details of these land holdings are enclosed on the attached plans. Noting this substantial Annington leasehold ownership as part of the text on page 16 of the draft Plan is important to give an accurate picture of land ownership across the Barracks site.

If and until such time that the MoD advise the Married Quarters Estate is no longer needed by the MoD, then we 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 we would be delighted to work with the MoD and Council to deliver on the principles of the draft Neighbourhood Plan of which we are supportive, including the provision of 1,500 new homes.

Typically, where Married Quarter Estates are no longer required by the MoD, our 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 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.

We look forward to working with the Council and MoD in taking forward the Neighbourhood Plan. We would be delighted to meet with you either with or without the MoD in the first instance to progress,

Best wishes

[Redacted signature]

[Redacted signature]

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.





KEY

 RETAINED



REV	AMENDMENT	BY	DATE
PROJECT:			
CH LWELL			
TITLE:			
COMPOSITE			
SCALE: NTS		DRWG SHEET: A3	
DRAWING No.: NOT001_CHILWELL_COMPOSITE			
DRAWN BY: AK		DATE: 24/06/2019	
CHECKED BY: IW		DATE: 24/06/2019	

ANNINGTON  
HOMES 

1 James Street,  
London,  
W1U 1DR

   
[www.annington.co.uk](http://www.annington.co.uk)







**From:**

**Sent:**

05 August 2022 16:24

**To:**

**Subject:**

Chetwynd: Toton + Chilwell Neighbourhood Forum - Neighbourhood Plan

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you for being asked to respond to the Neighbourhood Plan

Please find our comments on your consultation

### **General Comments**

We have previously responded to the first draft plan and provided detailed information about cycling and walking to the Forum. Plan modifications seem to answer many of the key concerns we may have had in the past.

For the level of specification needed at this second stage we think this is a very good document and can create the right sort of aspirational picture for the future/new garden village whilst preserving heritage buildings and sites.

There is of course a lot to fight for when the developers show their faces.

We compliment

- the Neighbourhood Forum and their volunteers for the sterling work that they have done over a protracted and uncertain period of time
- Broxtowe Borough Council for the support they have given in getting funding and making progress.

### **Neighbourhood Plans – 1.1 to 1.8**

The Civic Society strongly agrees 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 are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area'.

In short , Neighbourhood Plans can , together with good engagement practice

- allow residents to influence the development and sustainability of their neighbourhood - this engagement in turn can promote pride in the neighbourhood.
- help stakeholders engage proactively and constructively in planning matters
- ensure that the multitude of individual decisions add up to something coherent for the whole area.
- is an important part of the national and local borough planning processes.

Neighbourhood Plans are essential if there is no town or parish council with no open local forum to allow influence by the residents over the long-term development of an area. 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.

### **The Plan's Timing**

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 it must be of great concern that the Government 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. 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. The Toton and Chetwynd Barracks Strategic Masterplan dated October 2021, needs revising to take account of these about turns. The consultation document was revised in November before the Government announcement on 18 November that Toton would no longer be the East Midlands HS2 Hub, a decision with knock-on effects for the plan that go well beyond just editing out references to HS2. This decision raises important questions about the whole nature of the future neighbourhood as well as elements, for example about the future of the Innovation Park. Essentially the HS2 decision implies a rethink of the plan is needed

However

7.12 It is good heritage buildings and sites are identified for reuse and close attention is being paid to blue, green and sustainable travel infrastructure.

8 The core objectives are 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 without the Forum area. The quality of cycling infrastructure in and out of the area is in fact very poor and needs 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 regardless of barriers such as the river Trent and Canal. More attention to detail relating to walking and cycling are needed and infrastructure needs to meet latest cycle infrastructure standards.

9. We are supportive of the objectives and aspirations within the plan

10. Achieving the Vision –

- Taking the various zones that are envisaged it is essential that a mix of housing, leisure facilities, educational establishments, services and retail are provided within 15-minute walking time in a neighbourhood – this is to avoid unnecessary car journeys within a zone.
- Proposals for local energy generation and efficiency and water reuse are excellent

#### Access to Broxtowe Borough Council Planning Documents

We are sorry to end on a negative note, but maps and diagrams are hard to use and understand using just screens and rightfully the consultation documents were to be available for inspection at the Reception in Foster Avenue. The website is quite clear that copies of the Neighbourhood Plan, Policies Map and supporting documents, (including the Consultation Statement, Basic Conditions Statement, and Strategic Environmental Assessment) were available to view in the Reception of the Council Offices, Foster Avenue, Beeston, Nottingham NG91AB, (during normal opening hours). For some of our members the Council Office had nothing to inspect and, worse still, seemed to know nothing at all about the consultation. The Council does need to progress and improve their processes for being more visible about any comments on consultations and in providing accessible information either online or at their sites. Other local councils have resolved this problem successfully.



# CHETWYND: TOTON + CHILWELL NEIGHBOURHOOD PLAN

## REGULATION 16 CONSULTATION

Dear Beeston Civic Society members,

The Chetwynd: The Toton and Chilwell Neighbourhood Forum has submitted its Neighbourhood Development Plan ('Neighbourhood Plan') to Broxtowe Borough Council.

A Neighbourhood Plan is a community-led framework for guiding the future development and growth of an area. It may contain a vision, aims, planning policies, proposals for improving the area or providing new facilities, or allocation of key sites for specific kinds of development.

Broxtowe Borough Council is now inviting comments on this Plan.

Details of where to view the documents, and how to respond, are set out in the Consultation Notice (further below) or on our website: <http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan>.

The consultation period will run from **Wednesday 8th June 2022 to Friday 22nd July 2022**; all representations must be received within this time

Yours faithfully

Ryan Dawson

Head of Planning and Economic Development

**TOWN AND COUNTRY PLANNING ACT 1990**

**(AMENDED BY THE LOCALISM ACT 2011)**

**NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS AMENDED)**

**SUBMISSION OF THE NEIGHBOURHOOD DEVELOPMENT PLAN  
FOR THE CHETWYND: THE TOTON AND CHILWELL  
NEIGHBOURHOOD AREA (THE "CHETWYND: THE TOTON AND  
CHILWELL NEIGHBOURHOOD PLAN"):**



# **CONSULTATION UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS AMENDED)**

Notice is given, that on 24th November 2021, a draft neighbourhood development plan (the “Chetwynd: The Toton and Chilwell Neighbourhood Plan”) was submitted to Broxtowe Borough Council, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

## **The ‘plan proposal’**

In accordance with Regulation 16, Broxtowe Borough Council is now consulting upon the draft Chetwynd: The Toton and Chilwell Neighbourhood Plan. The following documents are available on our website at [www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan):

- Chetwynd: The Toton and Chilwell Neighbourhood Plan;
- Chetwynd: The Toton and Chilwell Neighbourhood Plan Policies Map;
- Map of the area covered by the Neighbourhood Plan;
- Notice of the Consultation;
- Consultation Statement;
- Basic Conditions Statement;
- Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report, Screening Opinions from Historic England and Natural England, and Final Conclusions;
- Strategic Environmental Assessment (SEA) produced by AECOM on behalf of the Neighbourhood Forum;
- Plan Modifications (April 2020); and,
- Supplementary Plan Modifications (October 2021)

## **Submitting Representations under Regulation 16**

If you would like to make comments on the Neighbourhood Plan proposals, please email your comments to Broxtowe Borough Council at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk). A response form is available on our website at:

[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan).

You can also post a copy of your comments to Broxtowe Borough Council at:

Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation,

Planning Policy Team,  
Broxtowe Borough Council,  
Council Offices,  
Foster Avenue,  
Beeston,  
Nottingham,  
NG9 1AB.

Paper copies of the form are also available at the locations listed below.

A paper copy of the Neighbourhood Plan and related documents is also available to view at the Reception of Broxtowe Borough Council's Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB (during normal opening hours). Copies of the response form are also available at the same location.

**The consultation will run from Wednesday 8th June until Friday 22nd July 2022. All responses must be received within this time.**

Any representations may include a request to be notified of the local planning authority's decision under regulation 19 in relation to the neighbourhood development plan. Therefore, please confirm within any representations whether you would like to be notified when a decision is taken by the Borough Council on whether or not to 'make' the plan (i.e. if it is adopted as Council Policy under Regulation 19).

If you require any further information or assistance in relation to this public consultation or the Neighbourhood Plan document, please do not hesitate to contact the Planning Policy Team on **0115 917 3452 or 3015**. You can also email us at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

### **Data Protection**

Please note that the comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

**A large print version of this notice is available on request.**

Got to the application's page

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 05 August 2022 15:00  
**To:** Policy  
**Subject:** Chetwynd Neighbourhood Plan  
**Attachments:** chetwynd-toton-chilwell-neighbourhood-plan-regulation-16-consultation-form  
BHS response 5 August 2022.docx

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Policy Team

Please see attached response from the British Horse Society.

Kind regards

---

[REDACTED]

**The British Horse Society**

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Website: [www.bhs.org.uk](http://www.bhs.org.uk)

Right now, hundreds of horses are being rescued from a life of mistreatment, cruelty, and neglect. Our Second Chance project rehomes horses who have suffered an unhappy past, giving them a second chance to rest, recover and rediscover a better life at one of our BHS Approved Centres. Our centres are home to BHS-qualified professionals who are equipped with the understanding, patience, skills, and knowledge needed to assist and rehabilitate those horses in desperate need.

Without your help and our brilliant riding schools, these horses face an uncertain future.

Donate today to help give neglected horses a second chance [here](#).

# SECOND CHANCE APPEAL

**This email is confidential and intended solely for the use of the individual or individuals to whom it is addressed. Any views or opinions presented are solely those of the author and do not necessarily represent those of The British Horse Society or associated companies. If you are not the intended recipient be advised that you have received this email in error and that any use, dissemination, forwarding, printing or copying of this email is strictly prohibited. If you have received this email in error please contact the sender. The British Horse Society is an Appointed Representative of SEIB Insurance Brokers Ltd, who are authorised and regulated by the Financial Conduct Authority.**



# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> :
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	The British Horse Society
Address	<input type="text"/> Works
Postcode	<input type="text"/>
E-mail address	<input type="text"/>

Comments should be received by 5<sup>th</sup> August 2022

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes

☒

No

☐

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)

**Data Protection** - The comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

Please return completed forms to:

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

Please use a separate sheet of paper if required.



**1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

Neighbourhood Plan Infrastructure/Getting Around and Leisure/Heritage and Community

**2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☐ Support with modifications ☐ Oppose ☐ Have Comments ☒

**Please give details of your reasons for support/opposition, or make other comments here.**

The British Horse Society is the UK's largest equestrian Charity, with over 118,000 members representing the UK's 3 million horse riders. Nationally equestrians have just 22% of the rights of way network and are increasingly forced to use busy roads to access them.

Between 29.02.2020 – 28.02.2021

- 1,010 road incidents involving horses have been reported to The British Horse Society
- 46 horses have died
- 118 horses have been injured
- 130 people have been injured
- 45% of riders were victims to road rage or abuse
- 80% of incidents occurred because a vehicle passed by too closely to the horse
- 43% of incidents occurred because a vehicle passed by too quickly

This illustrates the importance of protecting, improving and extending safe off-road provision will help to prevent these numbers from increasing in the future.

DEFRA has recorded a population of 514 horses just in the immediate NG9 postcode area (2021). BETA (2019) calculated that each horse owned results in a £5,548 contribution to the economy annually so £2,851,672 in this neighbourhood. It is encouraging to see images of horse riding included in the documents.

*The Plan is misleading in the subheading 'footpaths and cycleways' as the public rights of way mentioned are footpaths and bridleways (Beeston BW27, BW28, BW21) . 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. Upgrading routes to continue connections eg Beeston FP17 should be advocated by the BC. The BHS works collaboratively with organisations such as Sustrans to establish successful shared routes. 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, the Leisure Facilities and green corridors described could include equestrian access around the perimeter of or through open spaces where this could reduce the need for equestrians to use the roads in order to reach the PRow network.*

Active travel does include equestrians. Jesse Norman in House of Commons debate on Road Safety, 5 November 2018: "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". 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. The Nottingham City ROWIP recognises the health and wellbeing benefits of horse riding and Broxtowe BC could use this as an opportunity to enhance rather than fragment safe access.

Please use a separate sheet of paper if required.

***This form is available in large print and other formats on request.***

- 1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

Neighbourhood Plan

- 2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support

☐

Support with  
modifications

☐

Oppose

☐

Have Comments

☐

**Please give details of your reasons for support/opposition, or make other comments here.**

Please use a separate sheet of paper if required.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 05 August 2022 15:01  
**To:** Policy  
**Cc:** [REDACTED]  
**Subject:** Chetwynd: The Toton and Chilwell Neighbourhood Plan - Bloor Homes Reps  
**Attachments:** chetwynd-toton-chilwell-neighbourhood-plan-reg-16-consultation-form Bloors.pdf;  
Toton-Chilwell NP reg 16 consultation - Bloors July22 FINAL.pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom this may concern.

Please find the attached representations submitted on behalf of Bloor Homes to the Chetwynd: The Toton and Chilwell Neighbourhood Plan regulation 16 consultation. I trust these will be considered as the Neighbourhood Plan progresses.

If the Council wish to discuss any matters raised within the representations further, then please do not hesitate to contact me.

Regards.

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]



Oxalis Planning, Toll Bar House,  
Landmere Lane, Edwalton, Nottingham, NG12 4DG

# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

## Agent (if applicable)

Please provide your client's name	Bloor Homes Limited
-----------------------------------	---------------------

## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	Oxalis Planning on behalf of Bloor Homes Limited
Address	<input type="text"/>
Postcode	<input type="text"/>
E-mail address	<input type="text"/>

**Comments should be received by 5<sup>th</sup> August 2022**

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes ☒ No ☐

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

**[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)**

**Data Protection** - The comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

## Please return completed forms to:

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

**1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

Please refer to the supporting statement submitted with this form – this highlights changes which are required to the Neighbourhood Plan as currently written.

**2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☐

Support with  
modifications ☒

Oppose ☐

Have Comments ☐

**Please give details of your reasons for support/opposition, or make other comments here.**

Please refer to the supporting statement submitted with this form – this highlights changes which are required to the Neighbourhood Plan as currently written.

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.



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**REGULATION 16 CONSULTATION RESPONSE  
to the  
CHETWYND: TOTON AND CHILWELL  
NEIGHBOURHOOD PLAN**

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Representations on behalf of  
BLOOR HOMES LIMITED

July 2022



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## **CONTENTS**

- 1. Introduction**
- 2. Toton – ‘unique opportunities’**
- 3. The Integrated Rail Plan**
- 4. The Neighbourhood Plan**
- 5. Land east of Toton Lane and north of the tram line**

## **Appendix 1 – Site Location Plan**

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## 1.0 Introduction

- 1.1 These representations are submitted by Oxalis Planning on behalf of Bloor Homes Limited who have significant land interests in the Toton site. The proposals set out by Bloor Homes are widely supportive of the objectives and vision for the area as outlined in the Chetwynd: Toton and Chilwell Neighbourhood Plan (CTTC-NP). However, Bloor Homes consider that there are opportunities for the delivery of a more comprehensive scheme which would better deliver the objectives and vision of the CTTC-NP in a truly transformational way.

## 2.0 Toton – ‘unique opportunities’

- 2.1 The vision for the Neighbourhood Plan rightly acknowledges the ‘unique opportunities’ presented by the proposed development in the area which reflect Toton as a strategic and highly sustainable location. The recent Integrated Rail Plan (IRP) also promotes accelerated investment in local transport at Toton which will help bring forward these unique opportunities and reinforces the area as being suitable for growth.
- 2.2 The Toton area was reviewed as part of a study of the growth options around Greater Nottingham, prepared by Aecom (2020). The study concluded that the Toton area has a ‘high potential’ for strategic growth due to the “*existing high accessibility levels*” within the area which include the A52, Toton Lane Tram Extension and associated Park and Ride public transport connections and facilities. Further accelerated investment in local transport, as stated within the IRP, enhances the connectivity of Toton and demonstrates its suitability as a focus for sustainable growth.
- 2.3 The land at Toton, east and west of Toton Lane, is therefore exceptionally well-placed to meet the needs of the community through, for example, new housing, accessible green space and new and enhanced footpath/cycle link connections. The land at Toton can also contribute to the needs of Broxtowe and also the wider economic growth of Greater Nottingham and indeed the East Midlands region.

## 3.0 Integrated Rail Plan

- 3.1 The IRP was published in November 2021 and outlines a £96bn strategy of rail construction and upgrades for the Midlands and the North to be delivered over the next 30 years.
- 3.2 In terms of Toton, the IRP details updated proposals for HS2 which no longer includes plans for a HS2 station at Toton. The IRP does however set out that further investment will be made in local transport at Toton which would include a station for local/regional services. The IRP proposes to accelerate economic investment for Toton as part of the regeneration planned for the area through match-funding with the private sector and the East Midlands Delivery Vehicle. The IRP also notes that the Government will look to exploit any linkages with other investments in Nottinghamshire, including a shuttle from Toton to the HS2 stop at East Midlands Parkway.
- 3.3 Notwithstanding the proposed HS2 changes affecting Toton within the IRP, it is clear that Toton remains a focus for growth and investment. Indeed, the IRP proposes to accelerate investment in the area much sooner than previously planned which will bring opportunities for growth and regeneration.
- 3.4 The CTTC-NP 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.

---

## 4.0 The Neighbourhood Plan

4.1 The vision within the CTTC-NP responds to consultation with the community and sets out four key principles that are required to achieve the vision. These key principles stated below and include some of their explanatory text:

- *“Improve existing and create new green infrastructure. Our vision is to create a green infrastructure which forms a multifunctional network, operating at a landscape scale across the whole Area...”*
- *“New footpaths / cycles routes and improve road congestion. Our vision is to promote active travel routes through our Area to reduce car journeys and limit their impact on air quality....Also, our vision is to build a new north-south access primary road to ease traffic congestion before significant further homes are built”*
- *“Sustainable design and construction. Our vision is that developments should take account of best practice examples of energy opportunities, carbon reduction technologies and sustainable design and construction practices...”*
- *“A focal point for the community. Our vision is to create friendly, plaza-style neighbourhood shopping centre(s) to form a new ‘heart’ for the community.”*

4.2 Bloor Homes support the above key principles and acknowledges the corresponding Figures 9.1, 9.2 and 9.3 which 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.

4.3 Notwithstanding the general support for the key principles referred to above, it is also vital that policies within the CTTC-NP do not prevent development from coming forward through measures and ambitions which are unduly restrictive or have uncertainty in how they can be delivered. This is 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 masterplanning process for the site which considers landscaping, ecology, accessibility and housing delivery. The Policy should therefore be amended to remove the stated widths and allow this to come forward through the masterplanning process.

4.4 The CTTC-NP shows the potential for further development north of the tram line and outside Policy 3.2 of the Broxtowe Part 2 Local Plan which sets the Toton Strategic Location for Growth (SLG) boundaries. Bloor Homes supports 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, Bloor Homes consider the CTTC-NP should be more positive about the potential for development north of the tram line and should advocate for a more comprehensive approach that would also include more housing and accessible open space to meet the needs of the community.

4.4 Bloor Homes also wish to highlight that there are differences between the CTTC-NP and the Toton and Chetwynd Barracks SPD (October 2021) which would provide a confusing setting for development coming forward within the Toton area. In particular, in respect of Toton the SPD sets out three-character areas: Toton North, Toton South and Toton East; which should be reflected in the CTTC-NP. With regards to Toton East and Toton South the focus for these areas in the SPD is residential with an inclusion for community facilities, whereas the CTTC-NP focuses on community and leisure/education provision. The CTTC-NP should be updated to reflect the SPD for these areas.

4.6 It is important that the CTTC-NP and SPD are more closely aligned to avoid complications in bringing development forward with two different plans covering the same area. It is also

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important that they both facilitate development at Toton in a more comprehensive way than currently set out, as highlighted in these representations.

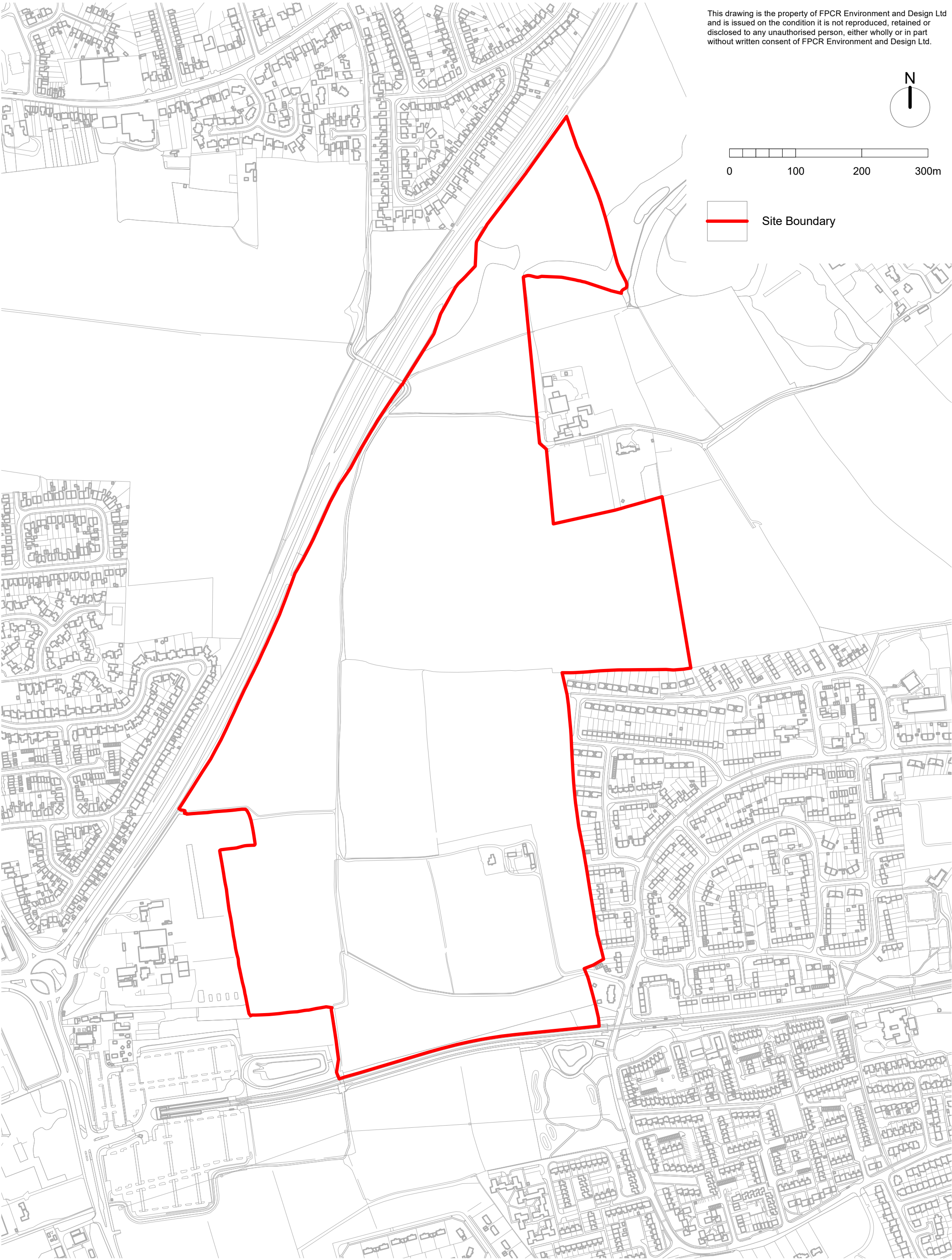
## **5.0 Land east of Toton Lane and north of the tram line**

- 5.1 Notwithstanding the general support for the key principles in the Neighbourhood Plan, Bloor Homes considers 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 SLG site area (as set out in Local Plan Policy 3.2).
- 5.2 The inclusion of additional land could deliver a significantly better outcome for the community and which would help deliver the key principles of the Neighbourhood Plan. In particular, 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 Stapleford, Bramcote and Chilwell;
  - Extensive green space, including the potential to create a Community Park on the northern part of the site
  - A significant number of sustainable new housing to meet the needs of the Borough and the community.
- 5.4 It is considered that the inclusion of the land east of Toton Lane and north of the tram line, within a comprehensively masterplanned scheme, can add to the CTTC-NP proposals and is indeed key to delivering a scheme which more fully meets the vision and key principles set out.
- 5.5 The land available, and which should be included within the masterplan for Toton, is identified on the attached Site Location Plan (**Appendix 1**). This land is outside the SLG area and predominantly outside the CTTC-NP area boundary but would allow a more comprehensive Toton scheme to be developed which could deliver substantial levels of housing and enable key infrastructure to be brought forward early. The additional land would also provide a significant area of open space with footpath and cycleway connections throughout the site, connecting communities in the area.
- 5.6 We acknowledge the advanced development of the CTTC-NP but would ask that the Neighbourhood Plan takes a positive approach to development north of the tram line and identifies the Bloor Homes land for a mix of infrastructure, landscaping and residential development to help with the delivery of a more comprehensive scheme at Toton.

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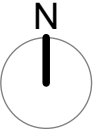
## **Appendix 1 – Site Location Plan**





NOTES

This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd.



Site Boundary

5538  
Toton  
Bloor

SITE LOCATION PLAN

STATUS 1:5000 @ A3  
13th January 2022 CEP/CEP  
5538-I-21 rev -

Project Code - Originator - Zone - Level - Type - Role - Drawing Number

- masterplanning
- environmental assessment
- landscape design
- urban design
- ecology
- architecture
- arboriculture

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 05 August 2022 14:58  
**To:** Policy  
**Cc:** [REDACTED]  
**Subject:** 20339 Toton and Chillwell Neighbourhood Plan Consultation Response DBC  
**Attachments:** 20339 DBC Reps to Toton Chillwell NP 05.08.22 (2).pdf; Neighbourhood Plan Consultation Response Form DBC (1).pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir / Madam,

On behalf of DB Cargo, I write to provide the following response to the Toton and Chilwell Neighbourhood Plan.

- Letter/Written Statement in response to Neighbourhood Plan Consultation (Firstplan, dated: 05.08.2022) (attached)
- Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form

I would be grateful for your confirmation of receipt of these representations and if we could be kept updated on progress and any future consultations in this respect.

Kind regards,

[REDACTED]

[REDACTED]

Associate

**FIRSTPLAN**

Broadwall House

[REDACTED]

[REDACTED]

[REDACTED]

: [www.firstplan.co.uk](http://www.firstplan.co.uk)

*Firstplan Ltd Registered Office: Broadwall House, 21 Broadwall, London, SE1 9PL  
Registered in England No. 4882565*

# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name	DB Cargo (UK) Ltd
-----------------------------------	-------------------

## Your Details

Title	■■■■■
Name	■■■■■
Organisation (if responding on behalf of an organisation)	Firstplan Ltd
Address	■■■■■ ■■■■■ ■■■■■
Postcode	■■■■■
E-mail address	■■■■■

**Comments should be received by 5<sup>th</sup> August 2022**

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes ☒ No ☐

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

**[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)**

**Data Protection** - The comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

**Please return completed forms to:**

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

- 1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

- Figure 10.1
- Section 9. The Vision for the Neighbourhood Area; Achieving the Vision (Page 40, Paragraph 9.6)
- Section 10. Guidelines and Aspirations; Housing and Urban Design; Guideline 07 (Page 49, Paragraph 10.29).
- Section 16. Urban Design. Policy URB05 (Page 76).

- 2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☐      Support with modifications ☐      Oppose ☐      Have Comments ☒

**Please give details of your reasons for support/opposition, or make other comments here.**

---

Please use a separate sheet of paper if required.

Please refer to accompanying covering letter (Firstplan Ltd, dated 05.08.22) and comments below submitted on behalf of DBC which suggest areas where the plan should be amended.

Figures 6.2 / 10.1 / Images on Title Pages of Sections B and C

- The figures identified above all provide 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.).
- As stated in the letter accompanying this response form DBC are committed to their site and operations, which are expected to continue for the foreseeable future.
- Following publication of the Integrated Rail Plan for the North and Midlands in March 2022, the Council will also be aware that it is no longer proposed to provide a HS2 Hub Station at Toton, with this proposed to be relocated to East Midlands Parkway. It is not correct to continue to illustrate that a HS2 station will be provided at Toton.
- It is suggested that these figures be updated and references to development outside the neighbourhood plan area be removed.

Section 9. The Vision for the Neighbourhood Area; Achieving the Vision (Page 40, Paragraph 9.6)

- This section details the vision for the 'Commercial / Innovation Campus (Blue Zone)' which in particular notes that the prime focus is for commercial development; however, there will be significant residential quarters in this zone to give a small city feel.
- DBC are concerned that there is a lack of reference to amenity issues. There is no consideration of the existing rail related operations which are being undertaken on the opposite side of the rail way line in relation to any new potentially sensitive (residential) uses coming forward as supported by the neighbourhood plan.
- DBC suggest the wording for bullet point 2 under the heading 'Commercial / Innovation Campus (Blue Zone)' is amended as follows (new text in red):

***"Prime focus is commercial development; however, there will be significant residential quarters in this zone to give a 'small-city' feel (subject to amenity issues for new noise sensitive uses being appropriately addressed)."***

Section 10. Guidelines and Aspirations; Housing and Urban Design; Guideline 07 (Page 49, Paragraph 10.29).

- Paragraph 10.49 details objectives and guidelines for masterplans being developed for and within the neighbourhood plan area.
  - DBC are concerned that there is no reference to consideration of amenity issues within the points listed.
  - DBC suggest that an additional bullet point be included as follows:
- 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).

Section 16. Urban Design. Policy URB05 (Page 76).

- Policy URB05 sets out support for the 'Toton Innovation Campus' which includes a mix of uses with integrated and standalone buildings for business, residential and retail uses.
- Similar to previous comments DBC are concerned there is no reference to issues of amenity.
- We reference paragraphs 4.4 and 4.5 (Page 61) of the Draft Toton and Chetwynd Barracks Strategic Masterplan SPD which states:

*"Proposals will need to demonstrate how they comply with Policy 19 of the Part 2 Local Plan, ensuring that development identifies potential nuisance issues and addresses impacts accordingly."*

*"This applies to the impacts of development within the Masterplan area on existing communities, as well as new development within the Masterplan having regard to existing and committed future"*

Please use a separate sheet of paper if required.

*sources of noise, light and odour in accordance with the 'agent of change' principles set out at paragraph 182 of the National Planning Policy Framework. This requires that existing businesses, uses and operations should not have unreasonable restrictions placed upon their operation as a result of development permitted after they were established – this includes businesses, uses and operations which are proposed for relocation in the masterplan, given that these will continue to operate in the short term and that their relocation in the long term cannot be guaranteed. Where an existing business, use or operation could have a significant adverse impact on new development in the vicinity, the new development will need to provide suitable mitigation. Details of such mitigation measures should be included as part of any planning application.”*

- DBC are of the view that similar text should be included alongside Policy URB 05 to ensure that in progressing detailed proposals, issues of amenity are considered centrally and at the outset.

***This form is available in large print and other formats on request.***



Our Ref: 20339/DBC/VW/jc  
Your Ref: n/a  
Email: [REDACTED]  
Date: 05 August 2022

Broxtowe Borough Council  
Planning Policy Team  
Council Offices, Foster Avenue  
Beeston, Nottinghamshire,  
NG9 1AB

**By email only: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)**

Dear Sir/Madam,

**CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN CONSULTATION: 08 JUNE 2022 – 05 AUGUST 2022 - RESPONSE ON BEHALF OF DB CARGO UK LTD**

**1. Introduction and Background Information**

We are instructed by our clients, DB Cargo UK Ltd ('DBC'), to provide the following response in respect of the Toton and Chilwell Neighbourhood Plan Consultation.

DBC are a local landowner and operator of Toton Sidings which immediately neighbours the Neighbourhood Plan Area to the west, on the opposite side of the train line. DBC is the UK's largest rail freight operating company and they hold both a significant freehold and leasehold interest in part of Toton Sidings and utilise the site for a range of rail freight related functions. It is a well-used and highly important strategic location for DBC operations across the country. Rail served sites of the size and nature of Toton Sidings comprise a scarce resource which are particularly difficult to replace.

A broad outline for all land containing operations at Toton Sidings is identified in red on the annotated Google Earth image provided at Figure 1.



**Figure 1:** Google Earth Annotated Aerial Image identifying Toton Sidings.

DBC are aware of the large scale regeneration proposals being progressed in the area and have actively engaged with Broxtowe Borough Council and EM Dev Co (East Midlands Development Company) in regard to preparation of the Toton and Chetwynd Barracks Strategic Masterplan SPD. For assistance, a copy of representations submitted in respect of the Strategic Masterplan are appended to this letter (Appendix 1). This provides further information relating to the nature of the site, DBC's operations and the relevant policy context. It also confirms DBC's position that they are committed to the site for the foreseeable future.

The key issues raised as part of these representations to the Strategic Masterplan SPD are set out below:

- Ensuring the correct and accurate representation of DBC's existing landholding and operations within Toton Sidings on both side of the railway.
- Ensuring that any redevelopment objectives of land owned and operated by DBC is based on the understanding that a suitable and viable relocation site is first identified and secured to ensure the relocation of operations uninterrupted and in full.
- Should DBC remain on site, as is expected for the longer term, that its operations are protected. Any redevelopment progressed for land surrounding DBC is compatible with DBC's operations. This is to ensure both an acceptable level of amenity for these uses / occupiers and that new development does not impose new restrictions on the ability of DBC to operate their site in accordance with the agent of change principle.
- Identifying that DBC is an active business, and it may adapt its operations and / or evolve as necessary whilst also securing new opportunities as they present themselves.

DBC have worked with Broxtowe Borough Council and EM Dev Co to agree changes to the Strategic Masterplan SPD to accord with these objectives.

The Toton and Chilwell Neighbourhood Plan must be in general conformity with the policies of the development plan (including the Strategic Masterplan SPD once adopted). The opportunity has therefore been taken to make similar representations to the Toton and Chilwell Neighbourhood Plan to ensure the plans are consistent.

## **2. Response to Neighbourhood Plan**

DBC's position at their site remains as set out above and detailed in the representations submitted to the Strategic Masterplan SPD. They are committed to site and expect to remain in situ for the foreseeable future.

Accordingly, DBC are concerned not just with safeguarding their existing site and operations but, of particular relevance to the neighbourhood plan, that any new development coming forward in the vicinity does not also prejudice their existing or future operation or place additional constraints on them. This approach is underpinned by the well-established Agent of Change principle in the NPPF.

On review of the Draft Neighbourhood Plan, DBC note that given residential uses are being supported within the plan area there is no clear reference to associated issues of amenity. Concerns are particularly raised regarding the 'Blue Zone' development area which is subject to policies LHC01 / EMP01 / EMP 04 / EMP05 / URB05. The 'Blue Zone' is located to the north west of the Neighbourhood Plan Area and directly on the opposite side of the railway to DBC's operations.

Given the close proximity of residential uses in relation to the rail way line / associated railway uses (Incl. DBC operations) being supported in the plan, issues of amenity should be built so that they are being actively considered at the outset when detailed development proposals are being formed. This is a key omission from the Neighbourhood Plan. Proposing sensitive uses which may impact on the operations of an existing business would conflict with the Agent of Change Principle and in turn the NPPF, in addition to the Strategic Masterplan SPD.



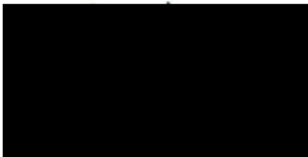
In addition to the comments above, representations are provided on behalf of DBC as set out in the accompanying consultation response form. These suggest where amendments should be made to ensure this key principle is built into the Neighbourhood Plan. This will both ensure that DBC will be able to continue to operate their site fully and that where residential uses being proposed within the Neighbourhood Plan area, they are appropriately designed and mitigated to achieve an acceptable level of amenity for future residents.

These align with the representations submitted to the Toton and Chetwynd Barracks Strategic Masterplan SPD and will ensure the plan is therefore consistent with adopted planning policy and the NPPF.

DBC would be very happy to further discuss these comments made to the Neighbourhood Plan Consultation.

In the meantime, we would be grateful if you could confirm receipt of these representations and that they have been duly made. We would request that we be kept updated on the progress of the Neighbourhood Plan and any future consultation.

Yours faithfully,



Associate



## Appendix 1

Our Ref: 20339/DBC&NR/VW/jc  
Your Ref: n/a  
Email: [REDACTED]  
Date: 20 November 2020

Broxtowe Borough Council  
Planning Policy Team  
Council Offices, Foster Avenue  
Beeston, Nottinghamshire,  
NG9 1AB

***By email only: [planningpolicy@broxtowe.gov.uk](mailto:planningpolicy@broxtowe.gov.uk)***

Dear Sir/Madam,

**TOTON AND CHETWYND BARRACKS STRATEGIC MASTERPLAN CONSULTATION: 12 OCTOBER 2020 – 22 NOVEMBER 2020  
RESPONSE ON BEHALF OF DB CARGO UK LTD AND NETWORK RAIL**

**1. Introduction and Background Information**

We are instructed by our clients, DB Cargo UK Ltd ('DBC') and Network Rail ('NR'), to provide the following response in respect of the Toton and Chetwynd Barracks Strategic Masterplan Consultation.

DBC is the UK's largest rail freight operating company and they hold both a significant freehold and leasehold interest in part of Toton Sidings and utilise the site for a range of rail freight related functions. The sidings is otherwise owned by Network Rail and utilised as a High Output Operations Base (HOOB) and Local Distribution Centre (LDC). A broad outline for all land containing operations at Toton Sidings is identified in red on the annotated Google Earth image provided at Figure 1.



**Figure 1:** Google Earth Annotated Aerial Image identifying Toton Sidings.

## **2. Toton Sidings and Current Operations**

### **i) DB Cargo**

A plan identifying land ownership parcels for DB Cargo at Toton Sidings and key operations is provided at Document 1.

#### **DOCUMENT 1**

As is evident from Document 1, DBC have a significant freehold and leasehold landholding at Toton Sidings and their operation extends to numerous functions across the site. These areas and operations notably extend significantly further than the 'Operational rail depot' (D) as identified on the consultation 'Constraints' Plan, on consultation slide 'Constraints and Opportunities'. The preparation of the masterplan must be based on accurate and up to date mapping and a full understanding of the DBC operations and landholdings at Toton Sidings.

By reference to Document 1, a summary of the DBC operation at Toton Sidings is provided below. DBC would be very happy to provide further information as required.

The Toton Traction Maintenance Depot (TMD) comprises the wider facility owned and operated by DBC. The main Traction Maintenance Shed (No. 5) is the only heavy maintenance depot for diesel locomotives operated by DBC in the UK and undertakes both heavy and light maintenance of DBC's diesel locomotive fleet. The TMD facility maintains a fleet of in excess of 250 DBC locomotives and Toton is also home to DBC's UK components supply warehouse.

The Toton TMD comprises a workforce of approximately 250 (of which circa. 150 are Engineering Staff and 50 are Support Staff) and consists of the following key elements which are all critical to DBC's operation at Toton Sidings:

- Secured vehicle and pedestrian entrance with gatehouse and 24/7 security.
- Good rail access.
- Traction Maintenance Shed.
- Associated facilities including: Fuel tanks, Infrastructure Maintenance Compound, Parts Storage, Paint Shop, Wagon Repair Depot, Engine Testing Area.
- Significant banks of rail sidings for site circulation, train stabling, storage of operational trains, rolling stock and surplus stock. It is relevant that old trains cannot simply be sent for recycling due to regulatory requirements, limited facilities and must be stored for extended lengths of time. The bank of surplus trains form DB Cargo's strategic reserve of locomotives.
- Administrative functions including: Admin, office and welfare buildings, training and driver simulator and staff car parking.

Vehicular access is provided to the north of the sidings via Derby Road. Rail access is provided to the north of the site just below the bridge at Brian Clough Way and there are also a number of rail connections to the south of the site.

The site is a secure facility and operates on an up to 24/7, 360 days a year basis. The site conducts a range of enclosed and open potentially noisy rail related functions such as locomotive testing which requires running diesel locomotive engines at full power over extended periods. The site also incorporates significant external lighting to accommodate operations taking place outside of daylight hours.

### **ii) Network Rail**



Network Rail also occupy an approximate area of 12.9ha within the wider sidings. Operations undertaken by Network Rail include a Local Distribution Centre (LDC) for receipt and transfer of ballast and stabling / maintenance of a High Output Ballasting Train which operates to replace rail track ballast, within a High Output Operations Base (HOOB). Associated functions include, loading fresh ballast into the train wagons, unloading old ballast, dividing and forming the train, stabling of the train and general maintenance, fuelling and crewing.

Additional land provides open areas with sidings access and are used on an ad-hoc basis for a range of functions.

### iii) Overview

Toton Sidings is a well-used and highly important strategic location for both DBC and NR's operations across the country. It is a valuable asset in which DBC and NR together comprise the predominant landowners and otherwise long leaseholder.

DBC and NR are particularly concerned not just with safeguarding their TMD, HOOB and LDC operations in terms of retaining their functions but also in ensuring that any new development coming forward in the vicinity does not prejudice their future operation or place additional constraints on them. This approach is underpinned by the Agent of Change principle in the NPPF.

Rail served sites of the size and nature of Toton Sidings comprise a scarce resource which are particularly difficult to replace. As evidenced at Document 1, the rail related functions undertaken at Toton require a considerable amount of land to accommodate train stock, large warehouse style buildings, the ability to work under unconstrained operating hours and appropriate separation distances from sensitive uses to undertake potentially noisy works. The importance of safeguarding rail served sites is underpinned by policy requirements at national level.

This context, together with an appreciation of how the site functions and the role this type of facility plays in assisting with the strategic maintenance of rail freight movement and sustainable supply of materials, is critical to understanding the basis for the objections made in response to the proposals as outlined in the Toton and Chetwynd Strategic Masterplan.

## 3. Relevant Policy Context

Critical to the consideration of future development and plans for the Toton and Chetwynd Strategic Masterplan area and how the DBC and NR rail served sites are planned for, are the relevant National, Strategic and Local planning policy requirements to which some reference has already been made. For avoidance of doubt the key policy context is detailed as follows:

### i) National

The National Planning Policy Framework (NPPF) (2019), in the context of *Facilitating the Sustainable Use of Minerals*, requires at Para 204(e) that:

*"Planning policies should:*

- e) Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products..."*

The DBC TMB at Toton sidings, whilst not undertaking minerals operations itself, is critical to the maintenance of DBC's extensive locomotive fleet and performs vital maintenance for rail freight locomotive workhorses.

In the context of safeguarding existing businesses which have the potential for creating noise or other disturbance, the Agent of Change principle as introduced by the revised NPPF is clear in its requirements at para 182 that:

*"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."*

It is also relevant that the continued operation and success of the heavy industrial operations at Toton Sidings by both Network Rail and DB Cargo would support the governments wider national 'levelling up' agenda. Freight is a vital component to the wider UK supply chain and significant contributor to the UK economy.

ii) Strategic

Nottinghamshire Minerals Local Plan (Adopted December 2005, Saved Policies September 2007)

Toton Sidings is noted as railway ballast recycling centre with planning permission granted in 2001 to allow for 100,000 tonnes of aggregate to be processed per annum.

There is no reference to Toton Sidings within the Minerals Local Plan – Publication Version (October 2019).

Nottingham CC Waste Local Plan (Adopted January 2002, Saved Policies September 2007)

Toton Sidings is identified as an 'Existing Waste Facility' at appendix A to Nottinghamshire and Nottingham Annual Monitoring Report. Identified for 'Recycling (Aggregate – restricted user) with a permitted capacity of 205,000 tonnes and operational capacity of 205,000 tonnes.

There is no reference to Toton Sidings within the Waste Local Plan – Consultation on Issued and Options Document (Feb 2020).

Greater Nottingham Strategic Plan (Growth Options Consultation September 2020)

The Strategic Plan is an emerging document covering the Greater Nottingham Area and centres on how Greater Nottingham's longer-term development needs can be met up to 2038.

Toton Hub, the proposed HS2 route and the Tram (Net) are identified within the Strategic Plan area in the vicinity of the Toton Sidings site.

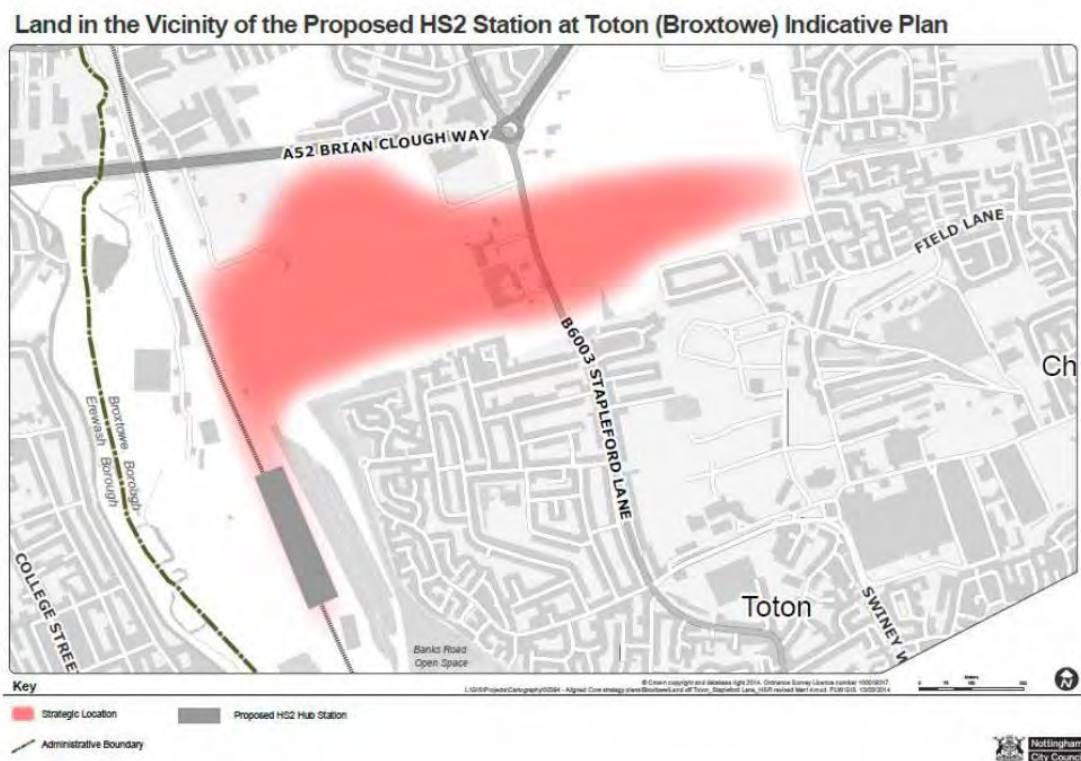
iii) Local

The Development Plan for Broxtowe BC comprises the Greater Nottingham Part 1 Local Plan and the Broxtowe Part 2 Local Plan.

## Greater Nottingham Part 1 Local Plan – Aligned Core Strategy (September 2014)

Policy 2, *The Spatial Strategy*, part 3 (a) iii, of the Aligned Core Strategy ('ACS'), confirms that approximately 24,995 homes in or adjoining the existing main built up areas of Nottingham areas to be provided and distributed across three boroughs including 3,800 in Broxtowe Borough Council. This provision is to include: 'A Strategic location for growth on land east and west of Toton Lane including Toton Sidings in the vicinity of the proposed HS2 station at Toton, in Broxtowe. This will include a minimum of 500 homes with the appropriate mix of this and other development to be recommended by Broxtowe HS2 Working Group and determined in Broxtowe's part 2 Local Plan'.

A Strategic Site Schedule and Plan is provided at Appendix A to the ACS. The Plan for 'Land in the Vicinity of the Proposed HS2 Station at Toton (Broxtowe)' is reproduced at Figure 2. It is notable that the 'Strategic Location' on the indicative plan includes only a very limited part of the DBC/Toton Sidings site, to the east of the railway line.



**Figure 2:** Extract from Greater Nottingham ACS Appendix A Strategic Site Schedules and Plans.

## Broxtowe Part 2 Local Plan (October 2019)

The adopted Policies Map for the Broxtowe Part 2 Local Plan identifies the DBC/Toton Sidings site as part of the 'Toton Mixed Use Allocation' and partly within Safeguarded Land for HS2.

Policy 3.2, *Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)*, refers to the site as a Strategic Location for Growth and introduces the requirement for a strategic masterplan to be prepared to help deliver development at the site. Part (d) of this policy relates to key development requirements to be subject to the Strategic Masterplan and confirms that:

*“Land allocated at Toton Strategic Location for Growth is expected to be brought forward for the following development, on a phased basis to achieve a comprehensive, high quality development. The precise type, quantum and form of development including infrastructure will be subject to further assessment as part of the preparation of the Strategic Masterplan and future revisions to the Infrastructure Delivery Plan”*

Policy 3.2 (d), amongst other things, is clear in confirming what is envisaged in terms of ‘Land Assembly’. The policy is very specific in its terms:

*“xxiii. Relocate the plant nursery, electricity substation, sewage works and Network Rail / DB Schenker off site subject to the viability of such proposals and appropriate relocation sites being identified and secured”*

### 3. Policy Assessment

At national level there is strong policy support for safeguarding of sites for bulk transport, handling and processing of minerals. As already confirmed, whilst the DBC activities at Toton Sidings are not for the bulk transport of minerals, they do perform an essential maintenance function to support the rail freight industry in this respect. The NR function does however include the receipt and bulk transport of railway ballast for use across the country and performs a critical maintenance function to the wider rail network. There is also a strong emphasis on ensuring existing businesses are not unduly compromised by restrictions placed on them as a result of development permitted after they were established under the agent of change principle.

This policy context supports the safeguarding and retention of Toton Sidings and resistance to any sensitive development being provided in the near vicinity of the site that may impact on the operation.

At regional and local level, there is significant strategic guidance surrounding broad development goals for Toton Sidings, in association with the proposed HS2 hub, and Chetwynd Barracks, when it closes (due 2024), which forms the backbone to preparation of this Masterplan. However, neither Broxtowe Borough Council, nor the Masterplan process will be responsible for how, when or indeed if the rail related uses at Toton Sidings are relocated.

We would reiterate the Broxtowe Part 2 Local Plan Policy 3.2 (d) with regard to land assembly, where relocation of Network Rail and DB Schenker is very much predicated on the basis of it being *‘subject to the viability of such proposals and appropriate relocation sites being identified and secured’*.

The implication of this is of course that there is a possibility that Network Rail/DB Schenker (now DB Cargo) cannot be relocated from the Toton Sidings site either as a result of viability considerations and/or the failure to identify appropriate relocation sites or those sites not being secured.

On this basis it would be a major failing of the Masterplan process if it were predicated on the basis that the Network Rail/DB Cargo activities will be relocated. For the Masterplan to be sound it must conform with the adopted development plan and it must deal with the likely scenario that these uses will remain on the site and in probability, for the long term. The Masterplan must have in built flexibility to deal with phasing and the assumption that the rail related uses will not be relocated for some time and potentially not at all.

### 4. Relocation Requirements

In the context of Policy 3.2 (d) of the Local Plan Part 2 it is considered important to provide a level of understanding as to the challenge that relocation poses and what will be required in that respect. Reference is made again to Section 2 of this letter which details the considerable landholding and range of operations



accommodated at Toton Sidings. In particular, it is reiterated that Toton Sidings and the DBC Toton TMD is a highly important, strategic facility for DBC and the wider rail freight industry and its operation is planned to continue for the long term and that any relocation would need to ensure and maintain continuity of operations.

Key relocation requirements are identified as follows:

- **Operations:** Any alternative site would require provision of the following:
  - Approx. 5500m of rail track with accompanying points
  - Large warehouse buildings to house the Traction Maintenance Shed, Parts Store Paint Shop.
  - Offices and Car Parking for up to 250 people.
  - Land to accommodate associated functions of Infrastructure Maintenance Compound, Wagon Repair Depot, Engine Testing Area, training, and driver simulator
  - Land to accommodate fuel tanks of approx. 500,000l in capacity.
- **Location:**
  - Site to be open, level uninterrupted land with no environmental constraints.
  - Any site would need to be of considerable size to accommodate the required functions (in the region of 12.5ha and above) and be of an appropriate land value.
  - The DBC workforce comprises a collection of locally based skilled workers and a location within the vicinity of the existing Toton Sidings site is required to ensure retention of the existing skilled workforce.
- **Access:**
  - Excellent rail access is required including easy routing to all other regions and ability to provide several connections to the rail network.
  - The site will also need to be accessible for the workforce.
- **Environmental:**
  - Any location will need to be suitably separated from any sensitive neighbouring land uses to allow the unrestricted operation of the facility as it currently enjoyed (24/7/365 days a year).
  - Any location will need to be clear of any planning restrictions in terms of hours of operation or other operational controls.
- **Transitional/De-canting Arrangements:**
  - It is critically for any alternative site to be secured, built out and operational prior to relocation taking place to ensure no interruption to the business and continuity of operations.

The above criteria is not an exhaustive list, but merely sets out the range of fundamental requirements when assessing both viability and identification of alternative sites. DBC is not aware of any suitable sites that have been identified, and certainly none that have been proposed to them in recent times. DBC are of the clear view that securing an alternative site in the short to medium term will be extremely challenging. Even in the long term it is considered that meeting their relocation requirements will equally prove challenging.

Network Rail's operations similarly have a range of specific operational and environmental requirements for appropriate relocation.

DBC and NR are clear in their position that they will seek to protect their operation at Toton Sidings unless substantive, robust and clear evidence and a business case can be provided to them as to how a relocation could be achieved.

## 5. Response to Toton and Chetwynd Strategic Masterplan Consultation (Oct 2020 – Nov 2020)

The Toton and Chetwynd Barracks Strategic Masterplan is being produced to ensure the coordinated planning and delivery of development and infrastructure at Toton and Chetwynd Barracks as required by the Broxtowe Part 2 Local Plan and to set a framework to guide future development of the two sites.

In the context of what has been detailed in the preceding sections of this letter it should be evident that for the Masterplan to provide a robust framework for guiding future development it must be realistic about the long term retention of the rail related activities at Toton Sidings. In this context DBC and NR confirm their objection to the Masterplan as currently detailed in the consultation document in that it simply does not have regard to the need to deal with the likely scenario of these operations remaining on site for the long term. It is considered that in taking forward the Master planning exercise the following requirements / changes to the consultation proposals must be made:

- a) The Masterplan must comprehensively and robustly deal with the likely scenario that the DBC / NR operations will remain in part or in whole for the long-term. This will likely need to be demonstrated either through phasing proposals or provision of alternative options. It will need to be sufficiently flexible to deal with the uncertainty of relocation. As the Masterplan process itself does not have control in terms of finding and securing alternative sites nor indeed funding or delivering any relocation - then it must work on the basis the DB Cargo are likely to remain on site for the foreseeable future;
- b) The Masterplan must directly reference and confirm that any future potential relocation of DBC / NR's operations must fully accord with adopted Local Plan Part 2 Policy and is subject to the viability of such proposals and appropriate relocation sites being identified and secured.
- c) The Masterplan, on the basis that the DBC and NR Toton Sidings operations will likely remain for the long-term, must ensure that any sensitive development (residential/mixed use allocations) in close proximity to the sidings and existing or retained operations are expressly required to ensure they are planned, laid out, designed and mitigated so as not to prejudice the future operation of the sidings in accordance with the Agent of Change principle.

Any departure from the above approach, in particular by virtue of proposals for redevelopment of the sidings area itself without the inclusion of retained DBC uses and/or provision of sensitive development in the vicinity of the sidings is objected to in principle.

On the basis of the above background information, policy, relocation requirements and in principle objection to the assumption in the Masterplan that the operations at Toton sidings will be relocated - the following specific points of objection / response are made on behalf of DBC and NR to the Toton and Chetwynd Strategic Masterplan Consultation.

- **Objection (Over-arching):** That no provision has been made for the highly likely scenario that the NR and DB Cargo activities at Toton Sidings will remain for the long term and potentially permanently. All slides (including 'Our Vision', 'Transport and Movement', 'Character Areas', 'Open Space Network') simply assume the rail related activities will be relocated with no regard to phasing or timescales.
- **Objection to 'Background to the Consultation' Slide:** Either in the context of relationship to other plans or elsewhere within the document there should be direct reference to the Adopted Local Plan Part 2 requirement – with regard to the specific terms for any potential relocation of the NR and DB Cargo activities at Toton Sidings.

- **Objection to ‘Constraints and Opportunities’ Slide:**

Mapping – As is evident from Document 1, DBC and NR have a significant freehold and leasehold landholding at Toton Sidings and their operation extends to numerous functions across the site. These areas and operations notably extend significantly further than the ‘Operational rail depot’ (D) as identified on the consultation ‘Constraints’ Plan, on consultation slide ‘Constraints and Opportunities’. The preparation of the masterplan must be based on an accurate and up to date mapping and understanding of the DBC and NR operations and landholdings at Toton Sidings.

Text – Under the heading of ‘constraints’ – there is notably no reference to the Toton Sidings operation. This should be identified as a key constraint both in term of the challenges of relocation and the likelihood it will need to be retained and planned round.

On the basis of the information available to date and in respect to Toton Sidings, it would appear that the consultation document is some very significant way off being able to demonstrate how the form of development envisaged by the Masterplan could possibly be achieved (certainly not in the short to medium term). Given the logistical, financial and range of other challenges there will be to provide a comparable facility for relocation not planning for long term retention of the rail uses at Toton Sidings raises critical issues in terms of the deliverability of the Masterplan.

## **6. Conclusions and Next Steps**

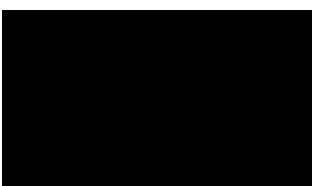
Given the likely uncertainty with regard to a suitable/available alternative site being secured the Strategic Masterplan must be progressed on the basis that the DBC and NR facilities and associated uses are to be retained and need to be integrated/consolidated within the Strategic Masterplan area. This will include the need to ensure that there is appropriate separation between the DBC / NR activities and any potentially sensitive receptors. The Masterplan should expressly require that residential uses are planned, laid out, designed and mitigated to ensure they do not prejudice the future operation of the rail uses in accordance with the agent of change principle.

As already stated, it would be a major failing of the Masterplan process if it were predicated on the basis that the Network Rail/DB Cargo activities will be relocated. For the Masterplan to be sound it must conform with the adopted development plan and it must deal with the likely scenario that these uses will remain on the site in probability for the long term. The Masterplan must have in built flexibility to deal with phasing and the assumption that the rail related uses will not be relocated for some time and potentially not at all.

DBC and Network Rail would be very happy to meet to review the objections made on the Strategic Masterplan Consultation with a view to working collaboratively to resolve the objection points raised and / or provide any further information or clarification as may be required.

In the meantime, we would be grateful if you could confirm receipt of these representations and confirmation that they have been duly made. We would request that we be kept updated on the progress of the Masterplan and any future consultation.

Yours faithfully,



Director

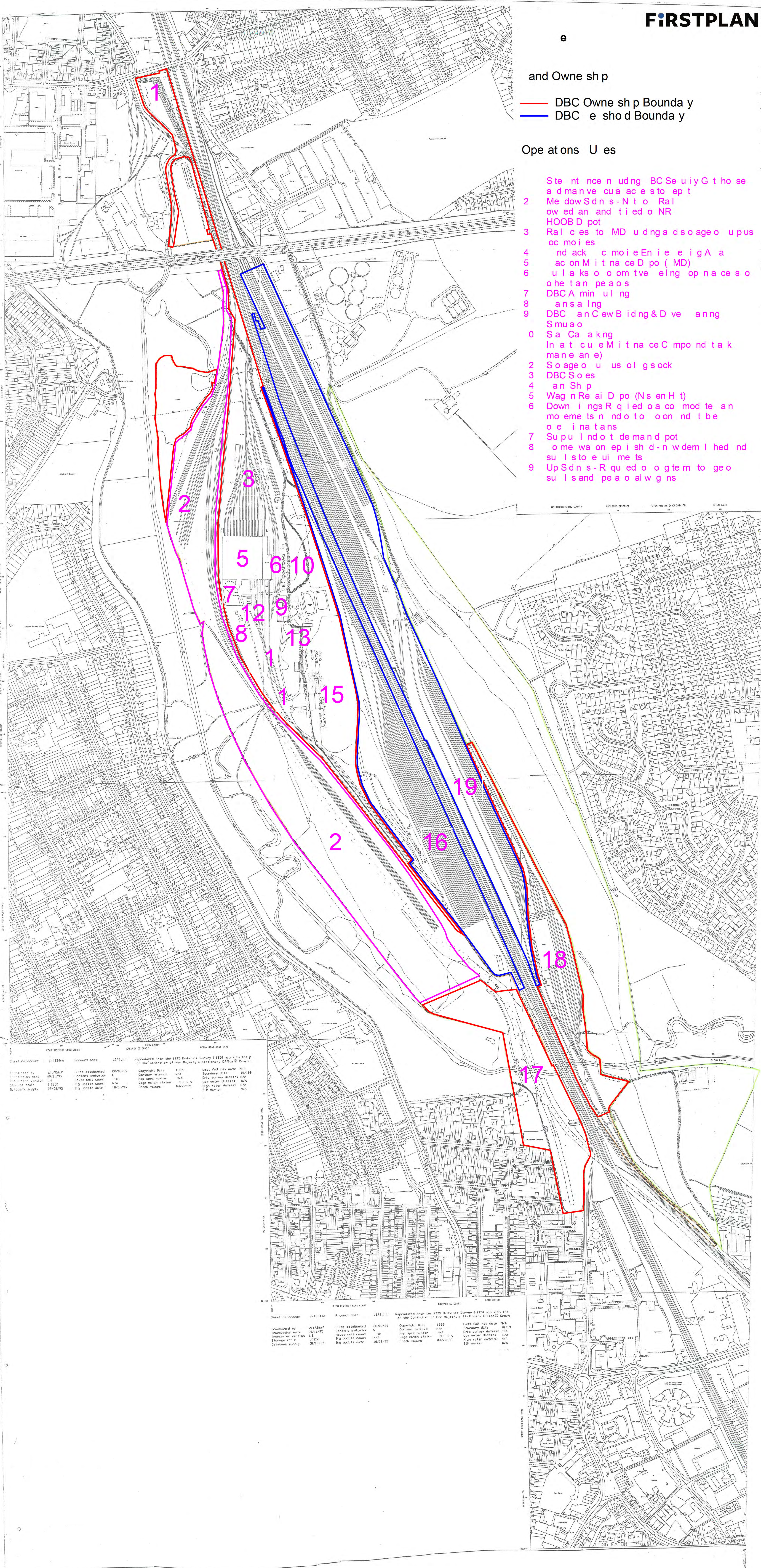
cc.





— DBC Ownership Boundary  
— DBC Leased Boundary

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 04 August 2022 17:09  
**To:** Policy  
**Subject:** Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation  
**Attachments:** Chetwynd Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Letter.pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Madam/Sir

Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation

Please find attached Derbyshire County Council's revised response to the above consultation. This replaces the response sent to you on 22 July 2022 which should now be ignored.

If anything is unclear, or if you have any questions, please contact me.

Yours faithfully

[REDACTED]  
Policy and Monitoring Team, and Joint Chair, Central Local Information Partnership (CLIP): Planning Sub-Group

[REDACTED]  
[REDACTED]  
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Beeston  
NOTTINGHAM  
NG9 1AB

Telephone [REDACTED]  
Ask for [REDACTED]  
Email [REDACTED]  
Our ref PM/DMD/Chetwynd: Toton and  
Chilwell Neighbourhood Plan  
Your ref  
Date 04 August 2022

Dear Sir/Madam

## **Localism Act 2011 – Strategic Planning Comments**

### **Chetwynd: The Toton and Chilwell Neighbourhood Plan Submission (Regulation 16) Consultation**

Thank you for consulting Derbyshire County Council (DCC) on the Submission version of Chetwynd: The Toton and Chilwell Neighbourhood Plan 2020-2040 (CTCNP). The comments below are DCC's Member and Officers' technical comments in relation to general matters, public transport, and climate change aspects of the Plan.

#### **Local Member Comments**

Councillor Alan Griffiths, the County Council Member for Long Eaton Electoral Division has been consulted. Thus far no comments have been received, but if I receive any I will forward them to you.

#### **Officer Comments**

##### **General**

DCC considers that CTCNP'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.

##### **Context**

DCC notes that much of the footprint of the CTCNP lies largely within the site of the Toton and Chetwynd Barracks Strategic Masterplan, which was the subject of a previous consultation (see DCC response attached).

As far as Derbyshire's transport networks are concerned, many of the wider transportation and access related 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. Notwithstanding the cancellation of the HS2 hub station at Toton (see 'Public Transport' comments below) DCC's Highways and Accessibility comments remain broadly as set out in pages 3-5 of the attached response.



**Public Transport**

From a public transport perspective, much of this plan still refers to the HS2 hub station at Toton. However, this was effectively cancelled last year as part of the Integrated Rail Plan for the North and Midlands. DCC would suggest that the CTCNP 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.

**Climate Change**

DCC welcomes the fact that an external Strategic Environmental Assessment on behalf of the Neighbourhood Forum has been conducted. This clearly details key impact areas that DCC would expect to be identified in a neighbourhood plan. DCC would suggest that reference should be made to this more widely in CTCNP as a running theme.

Within the document, DCC welcomes the reference to the mitigation of climate change in relation to the construction of dwellings (paragraph 7.26). This reference is built 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. DCC would suggest 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, DCC would suggest that these requirements should not simply be limited to new dwellings but should also be extended to existing buildings requiring extensions or retrofitting.

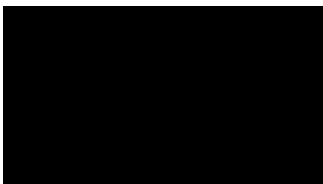
**Omission**

DCC would suggest 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 DCC would suggest 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 can be demonstrated that such proposals are essential for road and/or pedestrian safety.

DCC would like to be notified when a decision is taken by the Borough Council on whether or not to 'make' the plan (i.e., if it is adopted as Council Policy under Regulation 19).

Please contact me if you wish to discuss the comments further.

Yours faithfully



[REDACTED]  
Director

Broxtowe Borough Council

**By email**

Email: [REDACTED]

Telephone: [REDACTED]

Our ref: Developer Contributions/SB

Your ref:

Date: 20 November 2020

Dear Sir/Madam,

**Toton and Chetwynd Barracks Strategic Masterplan**

I refer to the consultation on the Toton and Chetwynd Barracks Strategic Masterplan. The comments set out below are Derbyshire County Council's comments on the emerging masterplan proposals, particularly in the context that the Masterplan has been commissioned by Broxtowe Borough Council and Nottinghamshire County Council with the support of Derbyshire County Council and Erewash Borough Council. Derbyshire County Council is working jointly and extensively with the other authorities referred to above through a number of Member and Officer working groups to seek to deliver the major area of strategic growth covered by the masterplan and particularly to maximise the economic development and regeneration benefits for Derbyshire that would be delivered by the HS2 station hub at Toton and the areas of employment development that would be included in the masterplan area.

The need for the preparation of the masterplan is set out in the recently adopted Broxtowe Borough Local Plan Part 2 in respect of the two strategic growth sites that are allocated in the Plan at Toton and Chetwynd Barracks. The Local Plan Part 2 identifies Toton and Chetwynd Barracks as strategic locations for growth for the delivery of 4,500 new homes and a new innovation campus for new technologies and businesses associated with proposals for the development of a new East Midlands HS2 Hub Station at Toton Sidings. Derbyshire County Council submitted extensive comments on these proposed allocations through the Local Plan process, particularly the Publication Local Plan and was supportive of their identification in the Plan as strategic locations for growth.

On the Chetwynd Barracks Site, Derbyshire County Council considered that the site was located in a very sustainable location within the urban area between Toton and Chilwell and would be located to take advantage of the recent opening of the NET extension and proposed HS2 station at Toton.

On the Toton Strategic Site, Derbyshire County Council considered that the broad area of the site would form a logical sustainable urban extension to the existing large area of residential development in Toton to the south of the allocation and west and north-east of the B6003 Stapleford Lane. The scale of housing and employment land identified was supported as the most appropriate scale and mix of development for the site. Because much of the area of land included in the allocation is Green Belt land, the comments



indicated that it was an important consideration in the design of the scheme that significant areas of landscaping and open space were incorporated to ensure that the separation of the urban areas Toton, Stapleford, Long Eaton and Chilwell were maintained. In terms of connectivity, it was welcomed and supported that policies in the Local Plan set out key requirements for the development of the site that would facilitate good connectivity of the site with the wider surrounding area, including within Derbyshire and particularly Erewash Borough through the provision of an integrated local transport system that facilitates access enhancements to the station from the two gateway towns of Long Eaton to the south (in Erewash Borough) and Stapleford to the north; and an integrated traffic system that flows well including proper consideration of access both from Long Eaton and Stapleford.

The County Council was also party to a joint submission in association with Nottinghamshire County Council, Nottingham City Council, Derby City Council, Erewash Borough Council, Broxtowe Borough Council and Chesterfield Borough Council to the Government's Housing Infrastructure Fund – Forward Funding Scheme for the HS2 East Midlands Network of Garden Villages. The Forward Funding bid included the identification of a range of large-scale housing development proposals in Derbyshire and Nottinghamshire, whose delivery could be facilitated through HIF and included the Toton Strategic Location for Growth and the Chetwynd Barracks site, which were supported as a key elements of the bid to maximise the delivery of housing growth associated with the development of HS2.

In addition, Derbyshire County Council is a partner on the Development Corporation that is being established to include the Toton and Chetwynd Barracks sites, the former Ratcliffe on Soar Power Station site and East Midlands Airport. In the context of the extensive joint working above, the preparation of the masterplan is welcomed and supported by the County Council. It acknowledged that this consultation sets out emerging work carried out so far by Arup and seeks views on some of the key elements of the proposals and, as such, much of the detail has yet to be finalised by Arup. The comments set out below, therefore, are made in that context and are made without prejudice to any further comments the County Council may make on the masterplan as it is finalised.

### General Comments

Overall, particularly in the context of the comments Derbyshire County Council has previously made on the two strategic growth sites through the Local Plan process, the vision; key development principles for the two sites; locations for development land uses and design principles for future development; and the transport and open space networks needed to support development including linkages to the surrounding area, including Long Eaton are all broadly supported.

It is considered that the broad design and layout of the site has been well conceived and appropriately seeks to maximise the connectivity of the two strategic sites, including the HS2 station hub, to the immediate and surrounding area, particularly to Long Eaton in Derbyshire. Current connectivity of the masterplan area to the wider area of Toton, Chilwell and Long Eaton is fragmented and so this has been well addressed as a priority in the Masterplan with proposed new and improved pedestrian and highway links and proposed expansion of the NET from Toton Lane through the site to connect with the HS2 station hub and Long Eaton. This priority is appropriately reflected in the Vision. In addition, this is a unique opportunity to create a new large carbon zero sustainable community, which is also appropriately set out in the Vision. This relates well to Derbyshire County Council's own priority to meet its commitment to net zero carbon emissions for the County by 2050, as set out in the Derbyshire Environment and Climate Change Framework.

In the context of the County Councils comments on the Publication Local Plan relating to the Toton and Chetwynd sites being situated within the Green Belt, the priority given in the masterplan to the provision of an extensive network of green infrastructure and open space is welcomed and supported. There are a number of distinct settlements in close proximity to the masterplan area including Long Eaton and Sandiacre (in Derbyshire) and Stapleford and Toton (in Nottinghamshire). It is important that the provision of green infrastructure and green corridors are appropriately planned to take this issue into account and seek to protect the separate identities of the four settlements. It is noted on the Open



Space Network Display Board 7, that a relatively extensive green corridor is proposed along the western and north western boundary of the masterplan area, which would help provide a degree of separation between Toton, Long Eaton, Sandiacre and Stapleford. This is welcomed and supported.

In the context of the character areas identified on Display Board 9, the location of the two key employment areas (Toton North and Toton West) are well positioned to be within relatively close proximity to residents in the settlements of Long Eaton and Sandiacre, which is fully supported and would provide relatively easy access to major employment opportunities for the residents of these two settlements. In this context, the provision of the proposed new walking and cycle links proposed to link to these two main employment areas, particularly from Long Eaton, is welcomed and supported.

### Highways and Accessibility Comments

The consultation identifies Toton and Chetwynd Barracks as strategic locations for growth for the delivery of 4,500 new homes and an innovation campus for new technologies and businesses associated with proposals for the development of a new East Midlands HS2 Hub Station at Toton Sidings. These proposals will clearly both generate significant movements of people and bring about large changes in travel behaviour across all modes of transport over a wide catchment area.

Earlier this year, Midlands Connect published its Access to Toton report. This sets out aspirations that are supported by both Derbyshire County Council and adjoining local Authorities. The proposed East Midlands Hub Station at Toton, as well as providing high speed rail services to London, will also provide new High Speed 2 connections within the Midlands and the North, with direct trains to Birmingham, Sheffield, Leeds, and Newcastle. The Access to Toton study was established to determine the most effective package of interventions to widen access to the Hub Station at Toton in order to boost the regional economic impact of HS2. The study was jointly funded by the four local transport authorities in the D2N2 area (Derby, Derbyshire, Nottingham, Nottinghamshire), DfT (HS2Growth Strategy funding), Highways England and Midlands Connect, with an in-kind contribution from HS2 Ltd, East Midlands Airport and Leicestershire County Council.

The package of recommended interventions is based around three phases: a package of well-defined measures that are operational for when the Hub Station opens, and a package of longer term measures (split into 2 phases), to be deliverable after HS2 opens, which can respond to changing patterns of travel demand and which as a result are generally less well defined at present. The Phase 1 package of 'day 1' measures comprise the following interventions, which are in addition to the Government's HS2 Reference Case, Midlands Connect Conventional Compatible services, and the proposed Strategic Housing Infrastructure Fund (SHIF) funded access road into Toton site:

- Local NET (tram) extensions to Long Eaton
- Enhanced local and sub-regional bus strategy
- Local Road Access from Long Eaton via A6005
- Part segregated Bus Rapid Transit (BRT) from Derby to the Hub Station
- Minimum of four conventional trains per hour from the Hub Station to Derby, Leicester & Nottingham via the Hub Station (requiring the proposed Trowell Curve); and
- New rail services between Mansfield and Derby/Leicester via the Hub Station, Ilkeston, and Langley Mill (the Maid Marian Line), with enhanced local bus services to both these stations.

The transport study work was underpinned by extensive research and modelling has provided an evidence-based account of how to best connect villages, towns and cities across the region to the HS2 East Midlands Hub, as well as identifying additional transport investments that will improve wider access to leisure facilities, educational institutions, local growth sites and employment centres.





These solutions include traditional rail, trams, tram-trains, bus rapid transit, conventional buses, and road improvements. Active travel, including walking and cycling routes will form a central part of the plan, and will be developed by local authorities. It will do this by:

- Maximising access to the East Midlands Hub station from across Nottinghamshire, Derbyshire, and Leicestershire
- Connecting development sites to towns, cities, and local communities
- Encouraging people to make more sustainable transport Choices

Extensive research and modelling has provided an evidence-based account of how to best connect villages, towns and cities across the region to the HS2 East Midlands Hub, as well as identifying additional transport investments that will improve wider access to leisure facilities, educational institutions, local growth sites and employment centres including Toton and Chetwynd Barracks.

The proposals currently under consideration in the latest Masterplan consultation include extension of the NET tram system from its current terminus at Toton Lane to the East Midlands Hub Station before going towards Long Eaton town centre. The NET extension, new bus terminus and taxi ranks are intended to complement the East Midlands Hub Station. New and extended bus routes will be provided, including 'bus gate' restrictions within Chetwynd Barracks to allow buses to serve the site and Chilwell. The proposals would also provide an extensive network of walking and cycling routes between Toton, Chetwynd Barracks, existing communities, and the East Midlands Hub Station. Road access to the Toton site will be provided from the A52 through new roads to the East Midlands Hub Station, and from the east of Bardills Island to Stapleford Lane.

In the context of the above, the County Council's main comment relates to the proposed road link from the site into Long Eaton (Board 8 Transport and Movement) which will then join up with the existing Midland Street in Long Eaton. Whilst the County Council is happy to see that this is shown as the route which the extended NET tram line will take into Long Eaton it has long been proposed that the new road link should only be for bus, taxis, cycles and pedestrians. This was to stop it acting as a rat run between Bardills and the A52 and Long Eaton and to ensure public transport, and cycles etc. got priority access to the HS2 station and surrounding new area.

However on the plans on Board 8 this is not mentioned as an option. This does need to be included if for no other reason than to reduce the amount of traffic trying to exit Midland Street onto the Long Eaton Green roundabout. This already struggles to cope with the existing situation and will be further complicated by the requirements of the extended NET line needing to get out and across into Market Street.

Further discussion with the County Council in relation to these matters is requested.

### **Community Facilities - Education**

It is noted that the masterplan includes proposals for two new primary schools within the site and expanded secondary school provision at George Spencer Academy to accommodate pupils likely to be generated by residents in the 4,500 new homes proposed for the masterplan area. This should ensure that the primary and secondary school place needs of the masterplan area are appropriately met within the site and should have no impact on school place provision within the adjoining Local Education Authority area in Derbyshire.



Derbyshire County Council would welcome the opportunity to engage in on-going discussions with Nottinghamshire County Council and Broxtowe Borough Council on this matter as proposals for the schools on the site are progressed.

I hope the above comments are of assistance in progressing the masterplan.

Yours faithfully,

[REDACTED]  
[REDACTED]



[REDACTED]

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**From:**

**Sent:**

[REDACTED]  
21 July 2022 17:47

**To:**

Policy

**Subject:**

20220721\_MINISTRY\_OF\_DEFENCE\_RESPONSE\_TOTON\_CHILWELL\_NP

**Attachments:**

20220610\_MOD\_Response.pdf

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DIO ref: 10038896

Planning ref: Toton and Chilwell Neighbourhood Plan

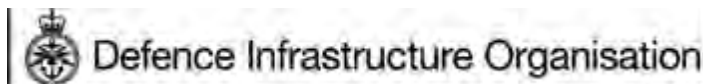
Dear Policy Team

Please find attached my letter, confirming the safeguarding position of the Ministry of Defence, in respect of the above policy planning consultation

Kind Regards

[REDACTED]

[REDACTED]



Website: [www.gov.uk/dio/](http://www.gov.uk/dio/)

Twitter: @mod\_dio

Read DIO's blog <http://insidedio.blog.gov.uk/>

[REDACTED]

---

**From:**

**Sent:**

22 July 2022 16:04

**To:**

**Cc:**

**Subject:**

RE: Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation 16 Consultation

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon James,

Thank you very much for ccing me into your email. We look forward to continuing our engagement with you and other Stakeholders across the Chetwynd site and within the locality, as we work towards submission of our Outline Planning Application.

Have a good weekend.

Kind regards

[REDACTED]

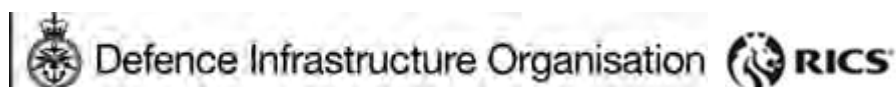
Assistant Head of Estates – Acquisitions and Disposals

[REDACTED]

---

[REDACTED]

**Website:** [www.mod.uk/DIO](http://www.mod.uk/DIO)



---

[REDACTED]

**Subject:** Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation 16 Consultation

Dear [REDACTED],

Further to your e-mail dated 16<sup>th</sup> June 2022 regarding the Draft Neighbourhood Plan, I write to introduce Annington to you, set out what we do and how we hope we can work with the Council and the MoD on bringing forward those



parts of the wider Chetwynd Barracks site, in which we have a 175 year leasehold interest, to support the wider objectives of the Neighbourhood Plan.

Annington are one of the largest private real estate owners in the UK. The company's objective is to accelerate the refurbishment, redevelopment for rental or sale of affordable ex-MOD homes to families who need them. We have a portfolio of over 39,000 properties, most of them rented by the MoD to provide quality, reasonably priced housing to Service Families.

Within the Chetwynd Barracks site shown on the plan at Figure 4.5 of the Neighbourhood Plan, we have a leasehold interest in two large land parcels comprising the Married Quarters Estate. Details of these land holdings are enclosed on the attached plans. Noting this substantial Annington leasehold ownership as part of the text on page 16 of the draft Plan is important to give an accurate picture of land ownership across the Barracks site.

If and until such time that the MoD advise the Married Quarters Estate is no longer needed by the MoD, then we 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 we would be delighted to work with the MoD and Council to deliver on the principles of the draft Neighbourhood Plan of which we are supportive, including the provision of 1,500 new homes.

Typically, where Married Quarter Estates are no longer required by the MoD, our 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 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.

We look forward to working with the Council and MoD in taking forward the Neighbourhood Plan. We would be delighted to meet with you either with or without the MoD in the first instance to progress,

Best wishes

[Redacted signature]

[Redacted name]

n.b I have also completed the form linked on your website with these comments and attach herewith.

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## Ministry of Defence

Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation  
Planning Policy Team  
Broxtowe Borough Council  
Council Offices  
Foster Avenue  
Beeston, Nottingham  
NG9 1AB

## Defence Infrastructure Organisation

Safeguarding Department  
Statutory & Offshore  
Defence Infrastructure Organisation  
St Georges House  
DIO Head Office  
DMS Whittington  
Lichfield  
Staffordshire  
WS14 9PY

[www.mod.uk/DIO](http://www.mod.uk/DIO)

21<sup>st</sup> July 2022

Your Ref: Broxtowe Borough Council -Toton and Chilwell Neighbourhood Plan Regulation 16  
Consultation

DIO Ref: 10038896 Rev2

Dear Sir/Madam

It is understood that Broxtowe Borough Council are undertaking a Consultation regarding their Toton and Chilwell Neighbourhood Plan Regulation 16.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

**Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.**

Having reviewed the supporting documentation in respect of Toton and Chilwell Neighbourhood Plan Regulation 16, the MOD have an area of interest in RAF Syerston.

The authority 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 authority area of the Toton and Chilwell Neighbourhood Plan.

Within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments as well as the creation of new waterbodies. Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development, potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.

In addition, and where development falls outside designated safeguarding zones, the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability by virtue of scale, height, or physical properties. Examples of these types of development include renewable energy development such as the installation of wind turbine generators or solar photo voltaic panels, or any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft. Solar PV development can compromise the operation of communications and other technical assets by introducing substantial areas of metal that degrade signals and, depending on the location of development, may produce glint and glare to the detriment of aviation safety. Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations potentially resulting in detriment to aviation safety and operational capability. This potential **is recognised in the Government's** online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more

The Toton and Chilwell Neighbourhood Plan contains references within the guidelines and aspirations section which identifies guidelines for development. 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, the MOD would wish to be consulted within the Toton and Chilwell 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.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

[Redacted signature block]



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 04 August 2022 13:57  
**To:** Policy  
**Cc:** [REDACTED]  
**Subject:** EMDC Neighbourhood Forum Plan Representations  
**Attachments:** EMDC Consultation Form .docx; EMDC Neighbourhood Forum Plan Representation Letter.docx

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Dear Broxtowe Policy Team,

Please find attached East Midlands Development Companies' representations regarding Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation 16 Consultation.

The required form has been completed alongside a letter detailing our response.

Kind Regards,

[REDACTED]

 [REDACTED] | [emdevco.co.uk](https://emdevco.co.uk)  
Trent Bridge House, West Bridgford, Nottingham, NG2 6BJ

# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	East Midlands Development Company (EMDC)
Address	<input type="text"/>
Postcode	<input type="text"/>
E-mail address	<input type="text"/>

Comments should be received by 5<sup>th</sup> August 2022

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes

☒

No

☐

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)

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Please return completed forms to:

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).



- 1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

EMDC's representations refer to a number of policies and aspirations, as detailed in the attached response letter.

- 2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☐

Support with  
modifications ☐

Oppose ☐

Have Comments ☐

**Please give details of your reasons for support/opposition, or make other comments here.**

Please see attached letter.

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.

Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation  
Planning Policy Team  
Broxtowe Borough Council  
Council Offices  
Foster Avenue  
Beeston, Nottingham  
NG9 1AB

26/07/2022

## Introduction

The East Midlands Development Company (EMDC) is grateful to have the opportunity to respond to the Regulation 16 consultation on Chetwynd: The Toton and Chilwell Neighbourhood Plan. EMDC is a company formed by five local authorities in the East Midlands to maximise the transformative potential and help to deliver three major development and regeneration sites, strategically located at the heart of the region – Toton and Chetwynd Barracks, Ratcliffe-on-Soar Power Station, and the East Midlands Airport area. EMDC brings together the ambition of local business, academia, and government partners, and is on a trajectory towards being formalised as a development corporation.

EMDC shares the Neighbourhood Forum's levels of ambition for the future of Toton and Chetwynd Barracks, and fully supports the Forum's vision to encourage world-class development of regional significance across the Neighbourhood Plan (NP) area. EMDC equally supports the Forum's desire to ensure that sustainable development takes place in a way which protects the area's important natural and historical characteristics.

## Alignment of the Neighbourhood Plan with the Strategic Masterplan SPD

The Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document (SPD) has been prepared by Broxtowe Borough Council in partnership with EMDC and Nottinghamshire County Council. Public consultation was undertaken on the SPD in Autumn 2021, and it is anticipated that the SPD will be adopted by Broxtowe Borough Council during late summer/early autumn 2022. The vision and objectives of the emerging NP are echoed in the emerging SPD, reflecting the Neighbourhood Forum's proactive engagement in the preparation of the SPD over a number of years.

The need for the SPD is enshrined in the Broxtowe Part 2 Local Plan (P2LP) 2018-2028, adopted in 2019. Policies 3.1 and 3.2 of the P2LP set out a number of key development requirements for development at Toton and Chetwynd Barracks and states that these will be resolved through the Strategic Masterplan process – notably the provision of appropriate green infrastructure, movement infrastructure and community facilities. These requirements in Policies 3.1 and 3.2 of the P2LP will therefore be fulfilled by the imminent adoption of the emerging SPD. It is in this context that the following representations on the Regulation 16 Neighbourhood Plan have been made.



### The Neighbourhood Plan's acknowledgement of the strategic masterplan process

Whilst the NP 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. For the NP to meet basic conditions test 'e' set out in Schedule 4B of the Town and Country Planning Act 1990 (as amended) – i.e., that the NP is in general conformity with the strategic policies set out in an existing development plan – the NP needs to be amended to make its relationship with the P2LP and subsequent SPD much clearer. We request that the NP include the SPD's Spatial Framework Plan (Figure 26) and note the Spatial Framework's significance in this context; namely that it establishes the framework for the future development of the area.

In addition, paragraphs 10.2-10.5 on page 46 of the NP variously refer to the preparation of 'masterplans', an 'overarching masterplan' and 'secondary masterplans.' To reflect the requirements of P2LP (and accord with basic condition 'e'), the NP should set out the distinction between different scales of planning within the area:

- Instead of an 'overarching masterplan', which is a vague term, the NP should refer specifically to the Strategic Masterplan SPD.
- The NP should be clear that the Strategic Masterplan SPD is (as it will be by the time the NP is made) adopted policy. As currently framed, the NP appears to require various things of the Strategic Masterplan, which will not be possible given this sequencing.
- The term, 'secondary masterplan', (and the matters required of this at Chetwynd Barracks), may need further clarification or consideration so as not to raise undue ambiguity in the context of the work that of site promoters and EMDC may also be undertaking to deliver sites within the NP area.

### Green infrastructure and movement infrastructure diagrams, Figures 9.1, 9.2 and 9.3

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. The P2LP gives the Strategic Masterplan the role of establishing green infrastructure and movement networks, and as such once the SPD is adopted it is considered that the NP will not meet basic condition 'e' in this regard. The inclusion of alternative networks in the NP will create uncertainty and ambiguity for developers, residents, and other stakeholders.

The NP 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 NP area which are covered by the Strategic Masterplan. It would be appropriate for the NP to add further detail beyond that set out in the SPD if desired, and EMDC would be pleased to support the Neighbourhood Forum in undertaking such an exercise.

### Relocation of George Spencer Academy, Paragraph 9.6, Figure 9.5, and Figure 10.1

EMDC is 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 NP area). 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. It has not been possible to establish at the present time whether any additional secondary school provision is necessary. The SPD therefore provides a flexible position on future provision, and the need (or otherwise) for the relocation of George Spencer Academy.

It is also noted that Figure 10.1 shows a green shaded 'development zone' within which a relocated school and other community uses could be located. This extends beyond the current allocated site boundaries in the P2LP, and into the Green Belt. This will require further consideration and dialogue through the examination process, including with Broxtowe Borough Council as the Local Planning Authority.

To avoid uncertainty and ambiguity for developers, residents and other stakeholders and ensure consistency between the SPD and NP, it is considered that the NP should adopt the same flexibility about options for future secondary education provision as the SPD.

#### Green corridor provision, Policies ENV03 and ENV04

Policy 3.2 of the P2LP sets out a requirement for a minimum 16ha of open space to be provided at Toton. As required by the P2LP, the Strategic Masterplan SPD sets out the means by which this will be achieved – notably the Green Infrastructure Framework Plan (Figure 22). By seeking to set out requirements for green infrastructure through a different route to that required by the P2LP, Policy ENV03 therefore does not meet basic condition ‘e’.

Policy ENV03 also seeks to meet all of the open space requirements for Toton through the provision of green corridors, without considering the contribution that other forms of green infrastructure will also make (parkland, playing fields, public realm etc), nor of the ability to meet some of the 16ha requirement on land within the P2LP’s allocation boundary that is not within the NP area. Whilst Policy ENV4 does reflect the existence of other forms of green infrastructure at Chetwynd Barracks, it still seeks to achieve a similarly large extent of green corridor provision as Policy ENV03 at Toton. As currently drafted, these policies are likely to make it impossible for the development quantum set out in the P2LP (and which the NP supports) to be delivered.

Policies ENV03 and ENV04 should be amended to ensure consistency with the general approach to green infrastructure provision set out in the P2LP and SPD.

#### Requirement for an infrastructure masterplan, Policy INF01

EMDC strongly supports the emphasis that the NP places on the provision of the right infrastructure to support development. This is consistent with EMDC’s own objectives, and the work it is undertaking to support the delivery of sustainable development. This includes a recent funding bid to the Government’s Levelling Up Fund to help deliver the first phase of the new boulevard at Toton and Chetwynd Barracks.

These matters have also been considered throughout the strategic masterplan process, effectively fulfilling the requirement set out in Policy INF01. It is noted that Policy 3.2 of the P2LP also indicates that Broxtowe Borough Council’s Infrastructure Delivery Plan will be the mechanism by which infrastructure delivery at Toton should be coordinated. It is therefore unclear what role Policy INF01 of the NP will have going forwards. 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 P2LP, this policy should be deleted.

#### **References to HS2 and the East Midlands Hub Station**

The NP includes 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, it is anticipated that the NP will need to respond to this change in context. Notwithstanding this, EMDC considers that development plans for Toton and Chetwynd Barracks should remain as ambitious as they were previously, particularly as the IRP proposes that Toton would still be served by a new National Rail station. It is therefore considered that the ambitious approach to development set out in the NP should be retained.



## Conclusion

EMDC strongly supports the Neighbourhood Forum's positive vision for the future development of Toton and Chetwynd Barracks. Subject to amendments being made to address the limited number of strategic-level conflicts with the P2LP and SPD set out above, EMDC considers that the NP will provide a strong basis for the area's future development.

Given the number of organisations involved in the delivery of development at Toton and Chetwynd Barracks (Broxtowe Borough Council, EMDC, the Neighbourhood Forum, Nottinghamshire County Council, developers, etc) and the general complexity of the strategic matters set out in this response, EMDC considers it necessary to hold hearings as part of the NP's examination to allow them to be adequately considered. This would also allow the latest implications of the Integrated Rail Plan and outcomes of EMDC's Levelling Up Fund bid to be fully explored and articulated to ensure the NP reflects the up-to-date position.

Yours sincerely,

A black rectangular redaction box covering the signature of the sender.

DRAFT

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 06 July 2022 13:45  
**To:** Policy  
**Cc:** [REDACTED]  
**Subject:** Chetwynd: The Toton and Chilwell Neighbourhood Plan

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Good Afternoon,

Thank you for consulting Erewash Borough Council on the Chetwynd: The Toton and Chilwell Neighbourhood Plan.

Erewash Borough Council have no further comments to make at this stage.

Kind Regards,

[REDACTED]

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 05 August 2022 16:27  
**To:** Policy  
**Cc:** [REDACTED]  
**Subject:** CTCNP Regulation 16 Consultation - Representations by Avison Young on behalf of Homes England and DIO  
**Attachments:** 22-08-05 CTCNP Reg 16 Comments HE-DIO FINAL.pdf; 22-08-05 CCTCNP Reg 16 HE-DIO Reps Cover Letter FINAL.pdf; 22-08-05 CTCNP Reg 16 Standard Form HE-DIO FINAL.pdf

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Good afternoon,

In response to the Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation 16 Consultation, please find attached:

- Standard Response Form prepared by Avison Young;
- Covering Letter prepared by Avison Young; and
- Representations made by Avison Young on behalf of Homes England and DIO.

Kind regards,

[REDACTED]

[REDACTED]

Planner

[REDACTED]

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# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name	Defence Infrastructure Organisation and Homes England
-----------------------------------	---

## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	Avison Young on behalf of Homes England (HE) and Defence Infrastructure Organisation (DIO)
Address	<input type="text"/>
Postcode	<input type="text"/>
E-mail address	<input type="text"/>

**Comments should be received by 5<sup>th</sup> August 2022**

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes

☒

No

☐

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

**[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)**

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**Please return completed forms to:**

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

**1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

HE and DIO have commented on a variety of matters in the Regulation 16 draft Plan. Rather than supply a Consultation response form for each, we have agreed with the LPA that we may submit one form, which cross refers to our Representations Letter. To assist the LPA, Forum and Examiner we have listed below the parts of the draft Plan to which HE/DIO's comments relate, and the relevant references in the Representations Letter.

Policy, Aspiration, Section, Objective or Paragraph	Avison Young Paragraph reference
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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**2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Please note that HE and DIO are seeking amendments to the Plan in relation to each of the above matters. This means that HE and DIO would object to the Plan being 'made' without the modifications that are sought (or would support the Plan if amended as proposed).

Support ☐ See above      Support with modification ☐ See above      Oppose ☐ See above      Have Comments ☐ See above

Please use a separate sheet of paper if required.



**Please give details of your reasons for support/opposition, or make other comments here.**

Please refer to the content of HE and DIO's representations letter which gives a full explanation of the reasons for their comments.

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.



Our Ref: 01C000793

[avisonyoung.co.uk](http://avisonyoung.co.uk)



5 August 2022

Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation,  
Planning Policy Team,  
Broxtowe Borough Council,  
Council Offices,  
Foster Avenue,  
Beeston,  
Nottingham,  
NG9 1AB

Dear Sir/Madam,

**The Chetwynd and Toton Neighbourhood Plan – Regulation 16 Consultation  
Representations on behalf of Homes England and the Defence Infrastructure  
Organisation, in relation to the Chetwynd Barracks**

Avison Young (AY) is instructed by Homes England (HE) to provide planning advice in respect of the redevelopment of Chetwynd Barracks (the Barracks). AY is instructed to prepare an outline planning application (OPA) for the redevelopment of the Barracks, and to engage as necessary in the preparation of relevant policy documents.

These representations to the Regulation 16 draft Neighbourhood Plan are submitted in this context. They are submitted on behalf of HE and with the input and agreement of the DIO. They reflect the position that HE and DIO have reached in respect of the gathering of evidence to support the preparation of the OPA, and are focused on matters that relate to the need for the Neighbourhood Plan to be in general conformity with the 'Strategic Policies' of the Local Plan, if the Basic Conditions are to be met.

HE and DIO wish to comment on various Policies, Aspirations, Guidelines, Objectives and paragraphs (twenty-five matters in total). Those comments are set out in full in the separate Representations Letter. Following a discussion with the Local Planning Authority, we have completed a single Standard Representation Form. In each case we are recommending changes to the Plan and so, to that extent, each comment represents an objection, but with means of resolving those objections suggested.

We have included in the Standard Representation Form, and have reproduced overleaf, a table which lists the matters on which HE and DIO have commented, and which cross refers to the relevant paragraphs in the Representations Letter. We hope that this will assist the Local Planning Authority, the Forum and the Examiner.

## Homes England and DIO – Schedule of Representations

Policy, Aspiration, Section, Objective or Paragraph	Avison Young Paragraph reference
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Section D, Chapter 18, Policy EMP05, Page 85 (Neighbourhood Centre)	46-53, 103
Policies Map	104

We hope that the approach adopted is clear, but should you require any further information or have any questions please do not hesitate to contact [REDACTED]

Yours faithfully

[REDACTED]



4 August 2022

Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation,  
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Dear Sir or Madam

**THE CHETWYND AND TOTON NEIGHBOURHOOD PLAN – REGULATION 16 CONSULTATION  
REPRESENTATIONS ON BEHALF OF HOMES ENGLAND AND THE DEFENCE INFRASTRUCTURE  
ORGANISATION, IN RELATION TO THE CHETWYND BARRACKS**

Avison Young (AY) is instructed by Homes England (HE) to provide planning advice in respect of the redevelopment of Chetwynd Barracks (the Barracks). HE has 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.

AY's instructions are to prepare an outline planning application (OPA) for the redevelopment of the Barracks, and to engage with the preparation of planning policy documents that affect the Barracks. AY made representations to the Greater Nottingham Strategic Plan (Growth Options) in September 2020, and to the 'Initial Consultation' on the Toton and Chetwynd Strategic Masterplan SPD in October 2020, and to the 'Draft Masterplan' SPD in January 2022.

Representations to the Regulation 14 draft Neighbourhood Plan were submitted by JLL on behalf of the DIO with contributions from Homes England, and by Homes England on its own behalf, in September 2019.

These representations to the Regulation 16 draft Neighbourhood Plan are submitted on behalf of HE, and with the input and agreement of the DIO. They are submitted having regard to the position that HE and DIO have reached in respect of the gathering of evidence to support the preparation of the OPA, 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' are to be met.

Policy 3.1 of the Broxtowe Local Plan No.2 (the BLP2) is particularly important in this respect given that:

- it allocates land at the Barracks for residential-led redevelopment, and
- it is a Strategic Policy (having regard to para: 076 Ref ID: 41-076-20190509 of the PPG which says that site allocations are strategic policies *"if they are central to achieving the vision and aspirations of the local plan"*).

HE/DIO continue to express the overall support for the Neighbourhood Plan process that they expressed at the Regulation 14 stage. They continue to support the overall vision, and the residential-led redevelopment of the Barracks, with there being a good deal of common ground between HE/DIO and the Forum.

HE/DIO are pleased to note the adjustments that have 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, have resolved or lessened their concerns. Nonetheless, there are some areas that remain of concern and which HE/DIO consider 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 Neighbourhood Plan is in general conformity with the Strategic Policies contained in the Local Plan for the area.

We start by commenting on various matters of principle and approach which provide important context to the more detailed comments that we make in Part 2 on the content of the Regulation 16 draft Plan. In Part 3 we summarise the changes that we have proposed in Part 2 and which we consider would ensure compliance with the Basic Conditions.

## **PART 1 - GENERAL COMMENTS ON KEY MATTERS**

### **Progress towards the submission of an Outline Planning Application**

1. In 2016 the Barracks was declared surplus to requirements by the MoD, although it currently remains operational. On 25 November 2021 the MoD published its 'Future Soldier' document, which sets out a vision for the future of the Army and, amongst other things, advises that the Royal Engineers that are currently stationed at the Barracks will relocate. Until the publication of Future Soldier, it was expected that the Barracks would be vacated over two phases in 2021 and 2024. The MoD now expects the Barracks to be vacated by 2026, possibly on a phased basis.
2. The partnering agreement with the DIO enables HE to act as master developer to bring the site forward for redevelopment. As part of this process HE appointed a multi-disciplinary team led by AY in August 2020 to promote the residential-led redevelopment of the site. Promotion will be by way of the submission of an OPA supported by a Masterplan, Parameter Plans and Design Code. The development is also deemed to be EIA development and so an Environmental Statement (ES) will be prepared.

3. The OPA will have regard to the content of Policy 3.1 in the adopted BLP2. It will include proposals for the phasing of the development, the mix of uses and the physical and social infrastructure that will be required to support the new community. HE and DIO anticipate that the OPA will be submitted in 2023.
4. HE has progressed a programme of site surveys and baseline analysis which is essential to inform the preparation of the Masterplan that will underpin the OPA. Surveys which have been completed include habitat and protected species surveys, a noise survey, topographic survey, tree survey and an assessment of the significance of the site's buildings. Strategic modelling of transportation impacts is ongoing, according to a methodology and scope agreed with Notts County Council (NCC) as Local Highway Authority (LHA) and National Highways. That process has been affected by the cancellation in late 2021 of HS2 north of East Midlands Parkway, which has created some uncertainty in relation to future year scenarios.
5. Utilities surveys and ground investigations are partially complete, and will be completed during 2022. The completion of these surveys is essential to the testing and preparation of robust Masterplan options, to the selection of a Preferred Masterplan, and to preparation of the OPA and the ES.

#### **Stakeholder Discussions**

6. HE has held initial pre-application discussions with Broxtowe Borough Council (BBC). HE has also established contact with the East Midlands Development Corporation (EMDC). It has started conversations with the Local Education Authority, Primary Healthcare Trust and Sport England in relation to the intention to incorporate into the OPA a primary school, healthcare and sports facilities.
7. HE has also met with the Chetwynd - The Toton & Chilwell Neighbourhood Forum (the Forum) on a number of occasions to keep the Forum updated on HE's progress, and to discuss issues and themes that are important to both parties in the preparation of the Chetwynd - The Toton & Chilwell Neighbourhood Plan ('the CTTCNP') and the OPA. Those discussions have highlighted that:
  - there is substantial common ground in relation to the vision for the future of the Barracks; and
  - there is substantial common ground in relation to key development parameters to be incorporated into the Masterplan and OPA.
8. Whilst there is a good deal of consensus, HE has some significant concerns that some of the content of the CTTCNP goes beyond the requirements of the Strategic Policies in the Aligned Core Strategy (ACS) and BLP2 (including Policy 3.1), and that some policies are not supported by a sufficient evidence base and so are not justified. For these reasons HE considers that a number of policy statements in the CTTCNP should be changed so as to advocate, rather than require, the outcomes that they seek. Others require amendment for other reasons to ensure compliance with the Basic Conditions. Others still should, in HE/DIO's view, be deleted.



**The Extent of HE's Interest**

9. The Site Location Plan at our [Appendix 1](#) indicates the land that will be within the OPA. This does not include all of the site which is allocated in Policy 3.1 of the BLP2. It differs in two respects.
- First, it does not include two areas of Serviced Family Accommodation (SFA) at the northern end of the site which are under the control of Annington Homes (AH). AH is required to maintain these areas of SFA until such times as it is released from its obligation to do so by the MoD. At that time, AH may decide to promote the redevelopment and/or disposal of all or part of these areas. These outcomes are uncertain and so the AH land does not form part of the OPA. It is worth noting, however, that:
    - DIO is obliged to maintain access and utilities connections to the AH land so that HE's Masterplan and OPA will ensure that the separate redevelopment of the AH land (if that is the outcome) in accordance with Policy 3.1 in the BLP2 is not prejudiced; and
    - the LPA is aware that HE's application will not include the AH land and is comfortable with that, provided that the OPA does not prejudice outcomes on the AH land; and
    - the Forum is also aware that HE's application will not include the AH land so that HE can only deliver those elements of certain infrastructure works which are important to the Forum that are within the OPA boundary.

These matters are particularly relevant to the references in the draft Plan to a Primary Access Road from Swiney Way to the A52, because any such route will pass through the Barracks, the AH land, land in public ownership, and other land that is under the control of residential developers.

- Second, the site excludes an area of land to the south-west which is within the BLP2 allocation but is to be retained by the MoD for use by the Cadets. The only implication this has for the development of the Barracks is that it will reduce the site's capacity (although not necessarily to below that anticipated in the BLP2).

**Evidence Base/Surveys and Basic Condition (e)**

10. HE had thought that the submission of the OPA might come before publication of the Regulation 16 draft Plan. That has not happened and may not happen before the Examination and Referendum, depending on the timing of the OPA and how the CTCNP proceeds through its remaining stages.
11. A robust OPA can only be submitted after HE has procured and considered the implications of all of the site surveys that are needed to inform the content of the Masterplan. The broader content of the OPA, including those matters that are to be secured by planning condition and/or obligation, must also be informed by Financial Viability Assessment, which is similarly dependant on a complete suite of site surveys. HE's comments on the content of the CTCNP, and those policies and proposals that seek to impose financial or other costs on the redevelopment of the site without an evidential basis for doing so, are made in this context.

12. 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”*.
13. At the same time, it is accepted that Neighbourhood Planning Bodies may not have access to similar levels of resource as LPAs, and that they may not be able to gain access to sites to carry out surveys. Or, as in this case, the evidence base relating to a site or to a general policy matter may simply not be complete. But, whilst the absence of evidence does not of itself lead to a failure 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. 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.
14. This conclusion is supported by the advice at para: 040 Reference ID: 41-040-20160211 of the PPG (11 02 2016) which advises that *“there is no ‘tick box’ list of evidence required for neighbourhood planning”* but that *“Proportionate, robust evidence should support the choices made and the approach taken”*.
15. The Forum may rely on evidence from various sources, including that which was gathered to support the preparation of the ACS and BLP2. In relation to Chetwynd Barracks and Policy 3.1, that evidence included various notes on technical and environmental matters prepared on behalf of DIO and which informed the Masterplan and Vision Document prepared by PRP. Whilst none of that evidence is referred to in Appendix IV of the Regulation 16 draft Plan, it is referred to at Paragraph 9.9. That material comprised an evidence base which was appropriate and sufficient to support the allocation of the Barracks in the BLP2. It was not sufficient, however, to enable the LPA to include detailed and prescriptive development requirements in Policy 3.1. Rather, Policy 3.1 identifies various development objectives and aspirations but defers, rightly, to the preparation of a planning application supported by more detailed evidence to determine how those will be manifest in any planning permission granted.
16. It follows that, if the CTCNP seeks to include more detailed or prescriptive requirements for the Barracks than those set out in the BLP2, without being able to place reliance on more recent, complete and robust site surveys, those policies or requirements may not be in general conformity with the Strategic Policies contained in the development plan for the area.

## **HS2 and Associated Infrastructure**

17. The Aligned Core Strategy (ACS) and BLP2 expect that HS2 would run through Toton and that it would be operational by 2032, which would encourage investment and job creation in the plan area during the plan period, and bring significant benefits in terms of sustainable transport and economic development in close proximity to the station, including the Innovation Campus. Certain infrastructure improvements (including the NET extension to Toton) are based on its delivery.

18. Since the Forum submitted the Reg 16 draft Plan government has published the Integrated Rail Plan (IRP). The IRP confirms that Phase 2b of HS2, which comprised the eastern leg of the network between Birmingham and Leeds, will not proceed. Instead, HS2 trains will run from the West Midlands to East Midlands Parkway on a high speed line, before continuing to Nottingham, Derby and Sheffield via the Midland main line, which is to be upgraded. In addition, the IRP reports that government will seek to promote *“transport improvements”* at Toton. However, the detail of those transport improvements remains to be confirmed.
19. It has been announced recently that the EMDC has been awarded £1m of funding by government to formulate a new strategy to make the most of the arrival of HS2 in the East Midlands. EMDC will manage local councils, Midlands Connect and others in the delivery of the strategy, which will examine the best ways to make high speed trains accessible to people and communities across the region, and look at the opportunities for economic growth that it offers through new development. It is understood that the strategy will also look at the potential for other rail connections to be linked up to high speed train services. The leader of NCC, Ben Bradley MP, who chairs the HS2 Executive Board in the East Midlands is quoted as saying that *“the funding will help us look at ways we can drive forward wider plans for investment projects at Toton ...”*. Press releases on 22 June 2022 advised that *“the work will also ensure that local masterplanning around stations is consistent with the HS2 growth strategy”* and that *“it is expected to take two years to complete”*.
20. Richard Carr, MD of EMDC is quoted as saying that *“this is a welcome investment by government which will enable our transport specialists to develop detailed plans aimed at maximising the connectivity of high speed rail. We will be looking at how HS2 will integrate with both existing transport networks and new projects planned for the future and the potential for development around the proposed station at East Mids Parkway”*.
21. Clarity over the rail and other transport infrastructure investment to be delivered following the IRP will not emerge for perhaps two years. HE does not believe that this has any direct implication for the Barracks, although the non-delivery of HS2 and associated transport infrastructure works does affect the assumptions to be made in the Transport Assessment that will support the evaluation of the impacts of the redevelopment of the Barracks. Whether it has substantive consequences for the content of the CTCNP insofar as that relates to Toton is not a matter on which HE/DIO wishes to comment.

#### **Primary North / South Access Road**

22. The CTCNP includes a vision *“to build a new north-south access primary road to ease traffic congestion before significant further homes are built”* (p.35). Para 9.17 says that *“this must be included as part of any masterplan for the [Barracks] site”* and para 10.16 that it should be *“safeguarded until it is constructed”*. Guideline 5 says 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 employment in the area”*. The supporting text at para 10.18 says that *“all masterplans must support this road and not compromise the timing of its delivery”*.



23. Policy INFO2 says 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”*. The supporting text says (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”*. An indicative alignment is shown on the Policies Map and at Fig 9.3.
24. The North-South Primary Access Road is expressed as an essential requirement to support the redevelopment of the Barracks, although no triggers for the delivery of any or all of it are set out. Moreover, there is no reference to the North-South Primary Access Road in the ACS, and only one reference to it in the BLP2. 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”*.
25. HE’s discussions with NCC, EMDC, BBC and the Forum have confirmed the aspiration to secure road infrastructure improvements. The BLP2 refers to these as a *“north/south link”*. The CTTCNP refers to them as the *“North-South Primary Access Road”*. NCC referred to the road as the *“Toton Lane Link Road”* when it formed one element of an unsuccessful bid for HIF funding in 2019. The Toton Lane Link Road was to provide additional capacity to address congestion at Bardills Island, whilst also providing a link to the north of the Barracks and improved links between Chilwell and Toton. That HIF bid sought £26.5m for road construction, land assembly and undergrounding of high voltage power cables.
26. In the absence of any published design, HE assumes that the Toton Lane Link Road scheme comprises 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.
27. At this point we refer to all of the content of paragraphs 54 to 76 of HE’s representations to the Strategic Masterplan SPD (which we have appended in full at [Appendix 2](#)). Those representations were drafted following a series of meetings with officers from the Development Management and modelling teams at NCC, and with those meetings and discussions supported by HE’s transport consultant Hydrock, and Systra who are carrying out the transport modelling in support of the preparation of the TA for the OPA. From those meetings emerged a clear consensus that the primary purpose of the Toton Link Road is to allow greater connectivity in the local area network. It provides an opportunity to take some pressure off Stapleford Lane/Toton Lane, but that is not its main aim. Moreover, the consensus is that the Toton Link Road will comprise a standard residential road with a 30mph design speed, which will follow a horizontal alignment to overcome the significant slopes in the western part of the Barracks site.
28. We note also that HE has agreed the approach to traffic modelling with NCC and with Systra, which developed and holds the strategic SATURN transport model which will be used to test the impacts of the proposed development on the highway network. The traffic modelling will test what proportion of

the Barracks may be developed without the construction of the Toton Link Road, but with the introduction of other mitigation, including active travel measures and public transport improvements.

29. Our discussions with NCC have confirmed that this will be the first time that any modelling has been undertaken to test the reliance of the Barracks on the delivery of a Link Road. That is unsurprising given that Policy 3.1 in the BLP2 does not require the delivery of the Link Road as a prerequisite to development (although BLP2 assumes the delivery of only 500 homes in the plan period).
30. It was announced in June 2022 that NCC is preparing a further bid for £40m of Levelling Up Funding to fund the Toton Link Road. This followed on from NCC's Economic Development and Asset Management Committee on 28 July 2021 resolving to commission the preparation of Phase 1 design work to progress the Toton Link Road so as to support future funding bids and a planning application in due course. A decision is expected in October. Until then, it remains the case that the Toton Link Road is neither designed, funded nor programmed and, moreover, in the course of our work for HE, we have not identified any studies or models which have set out its intended functional specification, or which have evaluated to what extent the development of the Barracks or the SLG is dependent on its delivery. Nor have its potential environmental consequences been evaluated.
31. Indeed, BBC confirmed in the SEA/HRA Screening Report in respect of the Submission version of the Neighbourhood Plan that the Forum was seeking additional development including *"a new road (proposed within Policy INFO2) presumably linking the A52 with the Chetwynd Barracks site. The land for this road has not been allocated either within the Broxtowe ACS or BLP2, and this has not been subject to a process of SA/SEA"*. The Screening Report goes on to note that because of this the CTTCNP *"will potentially influence strategic plans higher up in the spatial planning hierarchy, including the ACS and the Broxtowe Local Plan Part 2"*. This appears at odds with Basic Condition (e) because it indicates a conflict with the ACS and BLP2, because neither has tested or allocated provision for a Link Road. This is reinforced by the concerns expressed in the Screening Report about the inclusion of a policy in the CTTCNP 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. The Screening Report notes also at para 5.5 that:
  - there is no assessment in the draft CTTCNP of the road as a means of relieving congestion on Stapleford Lane, as per the wording of the CTTCNP (and we have noted that its primary purpose is, according to NCC, to provide transport choice); and
  - the boundary for the Chetwynd Barracks site used for the BLP2 Sustainability Assessment did not include land to the north which would presumably be required for the new highway link.
32. It is notable also that, despite BBC having recommended to the Forum that the Forum would be better to refer to an aspiration for the delivery of a North-South Primary Access Road (e.g. at para 5.9 of the Screening Report), the Forum has retained its proposed wording (see Supplementary Proposed Modifications, Table 3, p.14). Whilst we acknowledge that those recommendations were made by BBC in relation to the need for SEA of the CTTCNP (and the amended wording that BBC recommended would have enabled the Reg 16 Plan to have been published much sooner) they highlight a material risk of non-compliance with the Basic Conditions.

33. It is important to emphasise, however, that HE acknowledges the content of Policy 3.1, and that HE has explored how the OPA will “*facilitate*” a Link Road, should the need for that be confirmed through evidence, and has tested its conclusions on that matter with officers from BBC and NCC. This is also explained in the representations to the Strategic Masterplan SPD. We note the following points.
- a) First, that the only alignment of the Link Road in any published plan is in the Toton and Chetwynd Barracks Strategic Masterplan SPD (June 2021) and in the Regulation 14 and 16 versions of the CTTCNP. The alignments differ, and neither are achievable having regard to topography (although we acknowledge that Figure 9.3 is now annotated as being indicative only).
  - b) Second, BBC, EMDC and the Forum accept that HE can only deliver that part of any Link Road that falls within its boundary, and that this will be achieved by HE providing a suitable connection to the AH land so as “*positively facilitate*” delivery as and when other landowners bring forward proposals for the development of their land.
  - c) Third, HE/DIO are obliged to provide a connection to the AH land by virtue of the agreement between the MoD and AH, so that the OPA will in any event deliver that section of the route.
  - d) Fourth, the ongoing modelling exercise that HE is undertaking will establish for the first time the extent to which the development of the Barracks may be dependant on the creation of a Link Road, having first optimised the use of public transport and active travel opportunities.

### **Heritage Considerations**

34. Policy 3.1 of the BLP2 includes two references to heritage. 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”.*
35. The 2017 Masterplan prepared by PRP for the DIO to support consideration of the allocation of the Barracks in the BLP2 recognised the site’s heritage such that its vision included reference to maintaining four of the site’s military buildings (Williams Barracks, Building 125, Woodside House and the Red Cross Building) as well as the listed Memorial. HE continues to test the potential to retain these buildings, and potentially other structures, where that is practical, viable and beneficial in terms of place-making. A Statement of Significance forms the basis of HE’s assessment and concludes that none of the buildings on the site meet the criteria for statutory listing. There is no ‘local list’ in Broxtowe, but the Statement of Significance considers the extent to which buildings and structures might merit consideration as Non-Designated Heritage Assets. For those that do comprise Non-Designated Heritage Assets, the approach set out in paragraph 203 of the NPPF would apply to the consideration of their retention as part of the redevelopment of the site.
36. Building 157 will 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. 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) will be clearly set out in the OPA, so that the LPA may conclude whether the judgment required by paragraph 203 of the NPPF is appropriately applied.

37. We note the Forum's proposal in the supporting text to Policy LHC02 (on the recommendation of AECOM) that all those buildings and structures listed in Appendix II are to 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"*. As a matter of principle the approach set out conflicts with 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"*. It also conflicts with Basic Condition (e) because it promotes 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.

### **Green Infrastructure**

38. The site contains areas of green infrastructure which HE/DIO view as substantial assets to be retained within its OPA. The Vision in the 2017 Masterplan included that *"green corridors and public open spaces throughout the development will also deliver amenity and biodiversity benefits for people and wildlife alike"*.
39. Policy 3.1 of the BLP2 requires retention of the playing fields and sports facilities, Hobgoblin Wood and the Memorial Gardens. HE/DIO will retain these features in the Masterplan and OPA and will set out proposals for their future management and maintenance. The precise boundaries of these features are not included in the BLP2, and will be confirmed in the OPA by reference to a thorough, survey-based review of their extent, which will then be set out on a land-use Parameter Plan.
40. Policy 3.1 also refers to the retention and enhancement of *"green infrastructure corridors around the eastern and northern areas of the site"* as well as *"existing mature trees and grass verges"* to be incorporated into a boulevard approach to the street scene. HE/DIO supports these requirements in principle (as is evident from the Concept Masterplan in 2017). The general arrangement of these corridors and public open spaces will be indicated on the OPA Masterplan and in material that will describe the approach to strategic open space provision. The approach will be based on:
- the Tree Survey and Report that has been commissioned by HE,
  - the Preliminary Ecological Assessment/Habitat Survey and protected species surveys,
  - the drainage and SUDs strategy and the approach to the de-culverting watercourses,
  - the requirements of the Environment Act, and
  - wider place-making and design objectives, and the delivery of housing and other uses in accordance with the content of the ACS and BLP2.
41. HE is also pleased to note that the Regulation 16 draft Plan has annotated those figures and diagrams that relate to green infrastructure as 'Indicative' (Fig 9.1, 9.2, 9.5 and 13.2). HE remains concerned, however, that the CTCNP includes 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 is inappropriate and overly prescriptive for inclusion in the CTTCNP. These matters require careful and iterative assessment based on a complete evidence base and in balance with other place-making, design and development objectives. This is the approach that HE will adopt, in consultation with the LPA, Forum and other stakeholders, including through community consultation ahead of settling on a preferred Masterplan.

42. HE remains concerned also that some of the green corridors do not, and cannot, as per their stated aim, connect areas of POS, and that some extend outside the boundaries of the principal allocations. These concerns are, 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. This also addresses concerns that the green corridors pass across buildings that may be retained.
43. HE notes also that the Broxtowe Green Spaces Strategy is no longer extant so that references to it, and any reliance upon it, in the CTTCNP should be removed (e.g. at Table 13.1 and in the evidence base).
44. Moreover, whilst 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, HE is unsure of the extent of the areas that the Forum is seeking to designate. This is because they are defined only by 'pinheads' on Figure 13.1. Yet Appendix II of the CTTCNP includes site areas for Hobgoblin Wood, the playing fields and Memorial Gardens, and for other areas (which HE assumes might be those which the Forum refers to as potential future LGS). HE does not know how the pinheads relate to the areas in Appendix II. The lack of clarity over areas, and the lack of adequate justification for designation against the criteria in paragraph 101 and 102 of the NPPF is of concern and, as a consequence, the full implications of the proposal in ENV01 remain unclear. Given the comment at para 103 of the NPPF (that "*policies for managing development within a LGS should be consistent with those for green belts*") this is of great concern to HE, and is why DIO suggested at Reg 14 stage that the Forum must be clear about the boundaries of the proposed LGS. Because the Forum has chosen not to, ENV01 sets up a conflict with the Basic Conditions.
45. HE/DIO is also concerned that the reference to the Forum assessing the potential for other LGS to be designated during the plan period is 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 OPA, and in relation to the impact on the Strategic Policies of the Plan (i.e. Policy 3.1), if the effect of further designations were to impact on site capacity and viability.

#### **Local / Neighbourhood Centre**

46. To support the preparation of the 2017 Concept Masterplan and the promotion of the site through the BLP2 process DIO commissioned a retail needs assessment from JLL which concluded that an appropriate scale of floorspace within any planned new centre could comprise a foodstore of 2,000 sqm

gross (1,400 sqm net) and 1,000 sqm gross (700 sqm net) for local comparison shops and food and drink uses. The Concept Masterplan showed a Local Centre placed around the current access to the site from Swiney Way with the commentary noting that this location would allow it to complement the existing Tesco Extra.

47. Policy 3.1 which followed on from this work confirms that redevelopment is to be residential-led, but that various other elements will also need to be provided which include:
  - a small retail/service centre to meet local need *“along the main through route”* (i.e. its location is not specified or prescribed);
  - a new Primary School and Medical Centre within close proximity to the playing pitches and sports facilities at the south east of the site (and so the location of these facilities is indicated), and
  - small scale employment development (the location of which is not indicated).
48. The early draft Strategic Masterplan SPD proposed a centre on the Barracks that would *“meet local needs”* and would be located in the south-east of the site adjacent to the Memorial Garden. The draft SPD referred to school and healthcare uses being located in the Chetwynd West character area (possibly due to assumptions over the phasing of development) with Chetwynd East (north of Chetwynd Rd) to accommodate a new *“high-street style local centre focused around the listed Memorial and Memorial Gardens”* to include *“retail as well as other community facilities catering for local needs”*. There is no similar reference in the Chetwynd South text. HE commented by noting that the scale and distribution of uses is being tested and will have regard to site constraints and opportunities, viability and analysis of market demand.
49. HE has discussed this matter with BBC which has expressed a view that the new centre should meet local needs and should not exceed 2,500 sqm, with no individual unit comprising more than 500 sqm.
50. The Regulation 16 draft Plan promotes the delivery of a neighbourhood scale centre because that may create a sense of place that is currently absent from the area. The Plan anticipates 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 BLP2 requires to be located in the eastern part of the site. The Plan envisages the new centre as being car-free and comprising of an open plaza.
51. HE/DIO agree 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. HE/DIO also consider that these uses may be best located in the eastern part of the site, rather than as was shown on the 2017 Concept Masterplan. HE must, nonetheless, assemble evidence to support this view, and to inform the parameters that will be adopted in the OPA. This will include evidence from market-testing, and with that to be based on assumptions in relation to development phasing and programme, and the point at which different uses (including healthcare and education) may need to be delivered to meet needs. This makes the precise determination of the mix and scale of uses in the new centre challenging at present, so that incorporation of flexibility into the CTCNP is important.



52. For the purpose of these representations HE considers 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 is most likely to be delivered in the eastern part of the site. The centre may be anchored by a convenience store, and may comprise other uses in Classes E and F as well as sui generis uses. These various uses might be distributed around the site, and with some accommodated in any retained buildings, so as to support best overall outcomes.
53. Our comments on the relevant content of the Regulation 16 Plan are made in the context of the above. We have emboldened the text where HE/DIO are seeking changes to the Plan to ensure compliance with the Basic Conditions.

## **PART 2 - DETAILED COMMENTS BY SECTION**

### **Section B – The Neighbourhood Area – A Vision for the Future**

Section and Chapter	Policy No	Page No	Para No
9. Vision	-	35	-

54. The Vision comprises three statements. Whilst HE admires the Forum's ambition to prepare a plan that will set *"new standards in Britain"* HE is unsure how the Forum will measure that. Moreover, the third statement within the Vision refers to the East Mids Hub Station and Innovation Campus, the delivery of which are affected by the content of the IRP, so that the Vision may need to be adjusted to acknowledge that outcomes of the IRP are uncertain insofar as they may impact on the Neighbourhood Area.
55. In the text that follows the Forum explains that its vision includes building *"a new north-south access primary road to ease traffic congestion before significant further homes are built"*. As noted earlier NCC is preparing a bid for Levelling Up funding to support the construction of a Toton Link Road. Outcomes are uncertain and construction of any new road is not in the Forum's control. Moreover, the reference to the construction of the road being a constraint to the delivery of new homes is inappropriate, given that the Forum has no evidence to confirm how much development on the Barracks may be constructed without a need to build new road capacity. That is being prepared by HE and, as part of that, HE is exploring the potential for active travel and public transport improvements to reduce trips associated with the redevelopment of the Barracks. That may have a material impact on the need for and/or timing of any new road capacity. **The statement should be adjusted to state support for the construction of new road capacity if that is demonstrably required to deliver new development and if NCC secures funding.**
56. In relation to Sustainable Design and Construction, HE is committed to testing its development against Building for a Healthy Life, to delivering in accordance with the introduction of the Future Homes Standard, to investigating options for utilising MMC, to considering the feasibility of building conversions, and to ensuring that its applications are prepared according to the relevant policies in the development plan. Whilst this part of the Forum's vision is supported by HE, the Forum can only advocate that developers adopt the approaches that it sets out. **Replacement of the word 'require' with 'encourage' or even 'expect'** would be more appropriate (simply on the basis that the Forum is not the LPA, and so cannot require matters that may not be contained in the LPA's Validation Checklist).

57. In relation to the vision for a Focal Point for the Community we have explained the process that HE is following to determine the scale, composition and location of the new Neighbourhood Centre. **The reference in the text to the centre being located next to the Memorial Garden should be adjusted to reflect the 'preference' for such a location, so as to be consistent with the current wording of Policy LHC01.**

Section and Chapter	Policy No	Page No	Para No
9. Vision	-	39	-

58. HE supports the adjustment made to Figures 9.1, 9.2 and 9.3 with the addition of the word 'Indicative' since the Regulation 14 draft Plan. **HE proposes that the same annotation be added at Figure 9.4** given that this represents a sketch of only one option for delivering a 'focal point' for the community.

Section and Chapter	Policy No	Page No	Para No
9.4 Vision	-	40	9.6

59. The statements in the vision for the 'Community' zone needs to be amended to be consistent with other adjustments made in the Reg 16 draft Plan, and which HE recommends be made. **In particular, bullet 3 should indicate a preference for this location. The final bullet should not refer to the purpose of the North-South Primary Access Road being to ease traffic congestion, given the absence of evidence to support that statement.**

Section and Chapter	Policy No	Page No	Para No
9. Vision	-	43	9.21-9.23

60. Paras 9.21 to 9.23 refers to the Forum's aspiration to see Building 157 retained and re-used either on a temporary or permanent basis. At Regulation 14 draft Stage DIO advised that the retention of Building 157 had the potential to have a significant impact on the development of the site in terms of design and place-making outcomes and in terms of viability so that retention would have a significant impact on the ability to deliver 1,500 homes. The Forum's ideas in relation to the use of the building as a museum have not progressed, and the Forum has now acknowledged through changes to LHC02 that buildings will be retained only where it is feasible to do so. We have noted also that HE does not expect to retain Building 157 in its Masterplan and OPA because it is neither feasible nor viable to do so, having regard to the scale, form and location of the building, and because of the significant implications that retention would have for site capacity and layout. We note that the Borough Council shares these concerns as per their Comments and Observations on Policy LHC02. Retention on a temporary basis to support meanwhile uses will be considered in the context of HE's proposals for phasing and disposal. **Paras 9.21 to 9.23 should be amended accordingly.** HE comments in more detail on LHC02 later.

### Section C – A Framework for the Future

Section and Chapter	Policy No	Page No	Para No
10. Guidelines and Aspirations	Guideline 03	47	-

61. HE is considering the scope for de-culverting Moor Brook. However, it is yet to complete a survey of the culverted watercourses that cross the site; hence, any suggestion in relation to the approach to the culverts is premature. **HE therefore considers that Guideline: 03 should be changed to an 'Aspiration'.**

Section and Chapter	Policy No	Page No	Para No
10. Guidelines and Aspirations	Guideline 05	48	10.16-10.18

62. For the same reasons that are set out in Part A to these representations, and which are summarised in our comments on Chapter 9, p.35, **the text should be adjusted to accurately reflect the status of the Primary North-South Link Road in the BLP2. Guideline 05 should be re-cast as an 'Aspiration'.**

Section and Chapter	Policy No	Page No	Para No
10. Guidelines and Aspirations	Aspiration 04	50	10.31-10.33
	Aspiration 06	51	10.41-10.43
	Guideline 08	51	-

63. HE makes similar comments in relation to Aspiration 04, Aspiration 06, Guideline 08 and those paras that express a preference to retain Building 157 as per paras 9.21-9.23 and LHC02 below. More specifically:
- Aspiration 04 purports to relate to the re-purposing of Barracks Buildings but has a focus on developing an MMC factory, possibly on part of the land occupied by Building 157. **The second sentence has no relevance to re-purposing buildings (it talks about land) and should be deleted. If it was the Forum's intention that it should be read as relating to Building 157 or any other building (as opposed to land) the same points apply as at paras 36 and 60 above, so that it should be deleted in any event.**
  - Guideline 08 is a statement not a policy. It is also imprecise (it refers to "several" buildings, and so is incapable of reasonable interpretation), is not based on evidence of feasibility or viability and, moreover, suggests uses for retained buildings that are not suggested by Policy 3.1 (including a museum).
  - Aspiration 06 is unrealistic, as per paras 36 and 60 above, and should be deleted.**



## Section D – Neighbourhood Plan Policies

Section and Chapter	Policy No	Page No	Para No
13. Environment	ENV01 and Fig. 13.1	58	-

64. We have set out our concerns that the proposed LGS designations are defined only by ‘pinheads’ on Figure 13.1, yet their areas are defined in Appendix II (but without any explanation as to how those areas have been calculated), so that the extent of any designation (which brings with it policies akin to green belt) could impact on site capacity.
65. Moreover, the suggestion that additional LGS may be considered during the plan period is inappropriate having regard to paragraph 101 of the NPPF. **Figure 13.1 should at the very least show an indicative extent of the areas to be considered for LGS designation.**
66. **The final sentence of ENV01 should be deleted to accord with national policy.**
67. **Appendix II should be amended by removing the reference to ‘Area (ha)’ in the right hand column, or by referring to the areas as Indicative only.**

Section and Chapter	Policy No	Page No	Para No
13. Environment	ENV02	59	-

68. HE does not object to the principle of a proportionate contribution being made to enhance Toton Fields LNR where required but, to be consistent with CIL Regulation 122, **Policy ENV02 should be amended by the deletion of the words “or is likely to increase”** so that it is clear that a contribution will be made only where the statutory tests for financial contributions are met.

Section and Chapter	Policy No	Page No	Para No
13. Environment	ENV04 and Justification	60	

69. For the reasons set out in our general comments in Part 1, HE/DIO is concerned that the CTCNP includes in Policy ENV04, Table 13.1 and Appendix II a level of detail over the dimensions and land-take associated with green infrastructure that is inappropriate and overly prescriptive (not least as it is not based on evidence), and which go beyond the requirements of Policy 3.1. These matters require careful and iterative assessment based on a complete evidence base, and having regard to other place-making, design and development objectives.
70. **All width and area dimensions should be deleted from Policy ENV04 and the text under the heading ‘justification’ and amendments made to Appendix II as per para 67 above.**

Section and Chapter	Policy No	Page No	Para No
13. Environment	ENV05	64	

71. This policy amalgamates ENV04 and ENV03 from the Regulation 14 draft Plan. At that stage, DIO considered that ENV03 duplicated the requirements of policy in the ACS relating to planning obligations and included no trigger for ‘development’ within the Barracks. ENV04 was considered to be redundant given that arrangements for any necessary long-term stewardship will be determined at the OPA stage.

This remains the case (i.e. the policy is redundant as the matters that it covers have been reinforced by the adoption of the BLP2 and the content of Policy 3.1, 5 e)) so that **ENV05 should be deleted**.

Section and Chapter	Policy No	Page No	Para No
13. Environment	ENV06	64	-

72. There have been some changes to Policy ENV06 (previously ENV08), but those do not address the DIO's substantive comments at Regulation 14 stage. It remains the case that the text makes no provision for dead, dying or dangerous trees and does not make clear in what circumstances replacement trees are required (for example by reference to BS classification or if veteran/ancient). Moreover:
- there may be sound arboricultural, design, transport related or other reasons for removal, so that a measured approach is required to establishing a new landscape structure for the site; and
  - the meaning of 'replacement' is not defined by reference to number, size, species, or amenity value.
73. The explanatory text describes an approach that replicates the provisions of s.198 of the Town & Country Planning Act 1990 (as amended) in regard to TPOs, and a separate community designation which takes the Council's Arboricultural Officer out of the decision-making process is neither justified nor appropriate. The policy also duplicates provision made within Policy 3.1 of the BLP2.
74. On this basis **HE continues to promote the deletion of this policy** as being unnecessary and unworkable, and on the basis that these matters are covered adequately by Policy 3.1 of the BLP2.

Section and Chapter	Policy No	Page No	Para No
13. Environment	ENV08	65	

75. Policy ENV08 requires that any development has a "*positive impact*" on connectivity between ecological assets, including those beyond the Neighbourhood Area. It is not clear how BBC will be expected to apply this policy and to judge what constitutes a "*positive impact*" and which assets are to be connected. It is similarly not clear how applicants are expected to achieve such outcomes on land outside the Neighbourhood Area so that **those references should be deleted**.

Section and Chapter	Policy No	Page No	Para No
14. Infrastructure	INF02	67	

76. Since the Regulation 14 draft Plan was prepared the BLP2 has been adopted and the County and Borough Councils have progressed the preparation of the Toton and Chetwynd Strategic Masterplan SPD. HE/DIO and the Forum have had opportunities to comment on the Strategic Masterplan SPD. Moreover, since the Regulation 16 draft Plan was submitted government has issued the IRP, the implications of which for the area around Toton are to be considered by a two-year study. In addition the 2019 HIF funding bid associated with the Toton Link Road did not succeed, although NCC is now working on a bid for Levelling Up funding. The timescales associated with these matters is uncertain, as are the outcomes.

77. In this context HE/DIO will progress its assessment of transport impacts and any necessary mitigation in accordance with a process agreed with NCC and Highways England. That will adopt a 'vision and validate' approach and will determine the appropriate mix of active travel/public transport and any increase in road capacity required to support the development of the Barracks.
78. Given these circumstances and in the absence of (i) any evidence base to support the requirements of Policy INF01 or (ii) confirmation as to who will be responsible for progressing any such infrastructure masterplan (if that is any different from the Strategic Masterplan SPD) the policy has significant potential to prejudice the delivery of much needed homes and affordable homes.
79. **It should be amended so as to express the Forum's support for the delivery of a North-South Primary Access Road (but not a requirement for its delivery) and to refer to the preparation of Transport Assessments to test the need for new transport infrastructure.**
80. **It should not refer to the function of any route being to relieve issues with Stapleford Lane** as that is not its primary function and those 'issues' have not been evidenced.
81. **Policy should also, in HE's view, emphasise the need to maximise the potential of active travel measures and public transport** to reduce reliance on the construction of new road capacity.

Section and Chapter	Policy No	Page No	Para No
15. Housing and Sustainability	HAS01	71	

82. HE notes that the Regulation 16 version of HAS01 removes reference to Build to Rent and removes the proposed cap on social rented homes. The reference to the tenure mix reflecting the future needs of residents is welcomed, with that to be determined as part of the OPA process and with reference to the latest evidence on housing need at the time that any housing mix is fixed.
83. HE does not understand the addition of a reference to present proportions of owner occupied, affordable rented and market rented homes. The same principle applies that tenure mix should be determined having regard to the latest evidence at the time that planning applications are determined and in accordance with Policy 15 in the BLP2. Moreover, it is unclear what action the LPA is expected to take when "*recognising the present proportions in the Neighbourhood Area*" and there is potential for conflict with Policy HAS02 (which says that housing mix should meet the future needs of residents).
84. **On this basis the purpose of the policy is unclear and, if it is to be read as going beyond the requirements of BLP2 Policy 15: Housing Size, Mix and Choice, it should be deleted.**

Section and Chapter	Policy No	Page No	Para No
15. Housing and Sustainability	HAS03	72	

85. This policy replicates the Building Regulations (as it did at Reg 14 draft stage) so that, in accordance with Paragraph 154 (b) of the NPPF (which requires that '*any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards*') the policy should either;
- **be amended to cross refer to the NPPF and be in accordance with it; or**
  - **should be deleted.**



Section and Chapter	Policy No	Page No	Para No
15. Housing and Sustainability	HAS04	72	

86. This is considered an unreasonable requirement for a developer as there is no policy justification in the NPPF or the development plan for the policy as drafted.

87. **The policy should only advocate provision, so as to be consistent with para 114 of the NPPF, or it should be deleted.**

Section and Chapter	Policy No	Page No	Para No
15. Housing and Sustainability	HAS05	72	

88. HE welcomes the inclusion of wording that recognises that any requirement for low carbon energy capture, storage and distribution within new developments should be subject to assessment of feasibility and viability, within the context of other measures that may be adopted in relation to incorporation of passive design, high energy efficiency and low carbon technology.

Section and Chapter	Policy No	Page No	Para No
15. Housing and Sustainability	HAS06	73	

89. HAS06 explicitly advises that it covers matters set out in the Building Regulations. Planning policy should not replicate matters that are covered by separate legislation, so that **HAS06 should be deleted.**

Section and Chapter	Policy No	Page No	Para No
15. Housing and Sustainability	HAS07	73	

90. The purpose of the policy remains unclear (i.e. the use of MMC might reduce the time developers spend on site constructing individual homes, but may not necessarily reduce the time over which a site is built out, as that will depend on the rate of sales). **HE considers that the policy should be amended to require developers to consider the appropriateness of MMC**, including modular construction, having regard to anticipated build out rates.

Section and Chapter	Policy No	Page No	Para No
16. Urban Design	URB04	76	

91. Policy URB04 is incapable of application by the LPA given its reference to 'traditional orthodoxy'. It also potentially conflicts with the requirements of ACS Policy 10: Design and Enhancing Local Identity. To avoid these problems **HE recommends that the policy be revised to remove paragraph b) and that paragraph a) refers to an assessment against Building for a Healthy Life.**

Section and Chapter	Policy No	Page No	Para No
17. Leisure, Heritage and Community	LHC02	79	

92. Whilst some changes have been made to LHC02 it continues to refer to a list of 13 buildings and structures (Appendix II) which are considered by the Forum to be “*significant assets*” to the extent that the policy and text propose that they attain the status of ‘local listing’ in the CTTCNP.
93. Whilst the Forum refers to some of the “*assets*” being included in the HER, and elsewhere to the work carried out by JLL to support the allocation of the site in the BLP2, it presents no other assessment of the significance of the 13 buildings and structures. HE, on the other hand, has commissioned a detailed Statement of Significance as part of the evidence base to support decisions on building retention (alongside assessments of the viability and feasibility of conversion and the likelihood of securing occupiers for any retained space). That full suite of evidence will be presented to the Local Planning Authority and other stakeholders during consultation and as part of the OPA.
94. We noted earlier that the Forum’s proposal that all those buildings and structures in Appendix II are to be “*protected from future development by being ‘Locally Listed’ with the Plan*” and with a “*presumption in favour of their protections and/or re-purposing for public benefit*” conflicts with Basic Condition (a) except in relation to the War Memorial. The NPPF includes no such “*presumption in favour of retention*” in relation to non-designated heritage assets. For similar reasons it conflicts with Basic Condition (e).
95. HE continues to recommend that amendments must be made to LHC02 to ensure compliance with the content of Policy 3.1 and the NPPF (para 203). **If the first sentence were retained, but with the words “..., viable and sustainable” added, and the second sentence deleted, that would assist compliance with the Basic Conditions. The final paragraph of the supporting text should also be removed or reworded. Consequent changes should also be made to the Policies Map (by either deleting the building annotations or by making it clear in the Key that any retentions are subject to the approach in LHC02 (as proposed to be amended by HE).**

Section and Chapter	Policy No	Page No	Para No
17. Leisure, Heritage and Community	LHC07	81	

96. HE has held initial discussions with Sport England in relation to the future use of the playing fields and pavilion in the context of the requirement in Policy 3.1 that they be retained and enhanced. The BLP2 does not prescribe what enhancements may be made. That should be determined having regard to clear and up-to-date evidence in relation to supply and demand for main pitch sports. The Playing Pitch Strategy is out-of-date having been prepared in 2016, so that at the appropriate time HE and Sport England envisage the preparation of a proportionate and partial update of the PPS, if a full update has not been commissioned by BBC. That will inform decisions on an appropriate and sustainable mix of facilities, which may or may not include an AGP. HE will also agree with BBC what submissions will be required to demonstrate the long-term sustainability of the facilities.

97. So, whilst HE does not object to the policy, **the supporting text should reflect the need for robust evidence to support decisions on the mix of facilities.** That evidence may or may not conclude that there is a need for an AGP in the south of the Borough.

Section and Chapter	Policy No	Page No	Para No
18. Employment and Business	EMP02	84	

98. Policy 3.1 in the BLP2 specifies that proposals at the Barracks should include “*small scale employment development*”. It is assumed that this is the focus of EMP02, but that is not clear as EMP02 refers to a “*commercial zone*” which could include the Neighbourhood Centre.
99. HE will be exploring the delivery of employment floorspace, in relation to its scale, location and type, as part of the OPA. In doing so, it will have regard to up-to-date evidence base, market considerations and demand, impact on the capacity of the site for housing (and other infrastructure) and on securing the best design and place-making outcomes. It should also be noted that employment opportunities will also arise from the neighbourhood centre.
100. Alongside that, HE’s position on Building 157 is set out above. HE does not agree that Building 157 lends itself to being re-purposed (as the Regulation 14 draft Plan asserted) and considers that retention would impact on viability and be inconsistent with achieving best place-making and other outcomes. It would also appear inconsistent with the overall objectives of the Strategic Policies in the Local Plan (Policy 3.1).
101. **The policy should be amended to read “... where feasible and viable”.**
102. In addition, and in the absence of any evidence to support a conclusion that Building 157 lends itself to re-purposing, or that the area occupied by Building 157 is the most appropriate to accommodate commercial uses, **the second sentence should be deleted.**

Section and Chapter	Policy No	Page No	Para No
18. Employment and Business	EMP05	85	

103. HE explained in Part 1 the process that it is following to determine the appropriate scale, composition and location of a new Neighbourhood Centre. **The reference in the supporting text to EMP05 to the centre being located next to the Memorial Garden should be adjusted to reflect the ‘preference’ for such a location that is now included in LHC01.** That preference is repeated in EMP05. More generally, HE is unsure of the need for EMP05 as it appears to largely duplicate LHC01.

## The Policies Map

104. HE has reviewed the Policies Map in the context of all the above comments. Overall HE finds the Policies Map very difficult to read as a consequence of the choice of shading and other annotations so that consideration should be given to a review of presentation style. More specifically:
- a) INF03 – the pedestrian/cycle link is very difficult to pick out on the Policies Map.



- b) INF07 – the need for and location of any bus gate has yet to be fully tested so **the key should refer to this as 'Indicative'**.
- c) INF02 – the 'New Road' annotation appears to include both the North-South Primary Access Road and other roads within the site. Whilst HE appreciates that the annotation is 'Indicative' some appear to follow existing roads (and so are not new), and some that are new (for example that on the southern boundary) are unlikely to be routed as shown. **HE suggests that only the North-South Primary Access Road is shown, as an indicative alignment (to correspond with the annotations on the Figures in the Plan).** This is subject to HE's comments in relation to references to the road generally in the Reg 16 draft Plan.
- d) INF03 – whilst we note that is also 'Indicative' the route appears to run through existing dwellings.
- e) ENV01 – as per HE's comments on the relevant content of the Regulation 16 draft Plan, **references to the LGS should be to 'Proposed' LGS and with their extent being 'Indicative'**.
- f) ENV03/04 – again, whilst we note that the green corridors are indicative, they appear to run through areas of existing housing.
- g) LHC03 – HE does not consider it appropriate to indicate the proposed Heritage Trail on the Policies Map. A Heritage Trail is something that HE/DIO will consider carefully in preparing the OPA, but if the intention is that it be based around retained buildings (as page 80 suggests), the pattern of retentions is not yet determined. **The annotation should be removed from the Policies Map.**
- h) LHC05 – HE has explained that it has started discussions with the Local Education Authority and Primary Health Trust. The location of the school and healthcare facilities will be considered through ongoing discussions that will take into account development phasing and masterplan outcomes. It is premature to suggest a location for those on the Policies Map at this stage. Moreover, HE does not expect them to be located as shown on the Policies Map, and Policy 3.1 already indicates their likely location (which differs from that shown on the Policies Map).

### **PART 3 - BASIC CONDITIONS AND RECOMMENDED CHANGES**

- 105. HE/DIO are pleased to see that the Forum made a number of changes following on from DIO's comments on the Regulation 14 draft Plan which have met some of the concerns expressed at that stage. Nonetheless, HE/DIO has some significant outstanding concerns in relation to some of the content of the Neighbourhood Plan and its compliance with the Basic Conditions.
- 106. Basic Condition a) is that, having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan. This means that a neighbourhood plan must not constrain the delivery of important national policy objectives, which will include the delivery of housing and affordable housing. In a similar vein, paragraph 13 of the NPPF is clear that neighbourhood plans should support the delivery of strategic policies contained in local plans.
- 107. Basic Condition e) is that the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area (or any part of that area). The explanatory notes advise (Paragraph: 075 Reference ID: 41-075-20190509; 09 05 2019) that, when

considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider whether:

- the neighbourhood plan supports the general principle that the strategic policy is concerned with;
- the degree, if any, of conflict between the draft neighbourhood plan policy and the strategic policy;
- whether the draft neighbourhood plan policy provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy; and
- the rationale for the approach taken in the plan and the evidence to justify that approach.

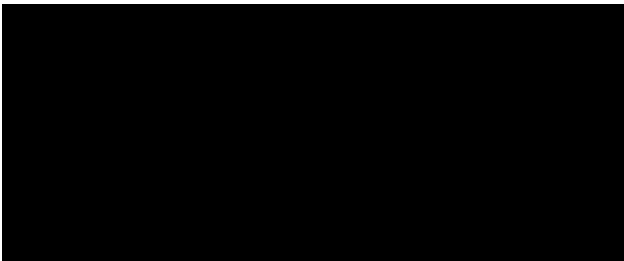
108. HE/DIO has paid particular attention to the potential for the policies in the Regulation 16 draft Plan to delay, prevent or reduce the delivery of housing from the Barracks. HE/DIO has concluded that there is that potential and, moreover, that certain approaches that go beyond the content of the ACS and BLP2 are not supported by evidence. **HE/DIO's principal concerns are as follows.**

- a) The Regulation 16 draft Plan includes multiple references to the North-South Primary Access Link being required to support any significant housing development, but with the Access Link being neither designed, funded nor programmed, and with no evidence yet in place to justify a conclusion that the development of significant further homes (with "significant" undefined) should not proceed ahead of its delivery, and with no trigger for delivery set out. The references to the Link Road in the Regulation 16 draft Plan go beyond the requirement in Policy 3.1 that the development of the Barracks should "*positively facilitate*" the provision of the link. This raises concerns about the impact on the delivery of new homes in the area, including on the Barracks. Moreover, it is not clear how the LPA is to apply Policy INF02 to an application on the Barracks, unless INF02 is intended to do nothing more than repeat in different form the requirement in Policy 3.1 that development should positively facilitate a link to the north.
- b) A second key area of concern is the multiple references to Building 157. Whilst LHC02 does not refer explicitly to Building 157 or to its retention, paras 9.23, 10.33, 10.41, 10.43, Aspiration 06 and Policy EMP02 do, whether in the construction or operational phase. HE/DIO are clear that retention will have a significant impact on viability and capacity, in conflict with the aspirations of Policy 3.1.
- c) Linked with this are the references to the CTCNP being a means of 'locally listing' 13 buildings and structures and the expression of a presumption in favour of their retention. This is not supported by evidence and goes beyond the requirements of paragraph 203 of the NPPF. We have suggested earlier how these conflicts with national and local plan policies may be addressed.
- d) A further key area of concern relates to the overly prescriptive approach to defining the dimensions of green spaces, which cuts across the confirmation that Figure 9.1 is indicative. Moreover, the approach to LGS is contrary to the relevant advice in the NPPF. Both may serve to unnecessarily and inappropriately reduce the contribution of the site to meeting local housing needs.

109. HE/DIO considers that these conflicts may be remedied by the changes to the wording of the relevant policies that we have suggested.

110. HE/DIO has also recommended other changes which, whilst they may not raise Basic Conditions issues, would ensure closer compliance with the content of the NPPF and Local Plan.
111. Following the completion of the Regulation 16 consultation, an independent examiner will be appointed to determine whether or not the Plan meets the Basic Conditions required to enable it to be 'made'. The legislation that controls the examination of Neighbourhood Plans state that the examiner should reach a view by considering written representations. Nevertheless, 056 Reference ID: 41-056-20180222 of the PPG states that, where the independent examiner considers it necessary to ensure adequate examination of an issue or to give a person a fair chance to put a case, they must hold a hearing to listen to oral representations about a particular issue.
112. We have, on behalf of HE/DIO, raised some significant issues in relation to infrastructure requirements, the approach that is taken towards the re-use of buildings generally, and other matters. Given the implications for the delivery of the objectives of the Strategic Policies of the Local Plan if the delivery of housing is limited or constrained unnecessarily, we would be pleased to examine the points via a discussion between our client, the Examiner and the Forum. A public hearing would be the most appropriate mechanism through which to assess these issues and ensure an adequate examination of the points.

Yours faithfully



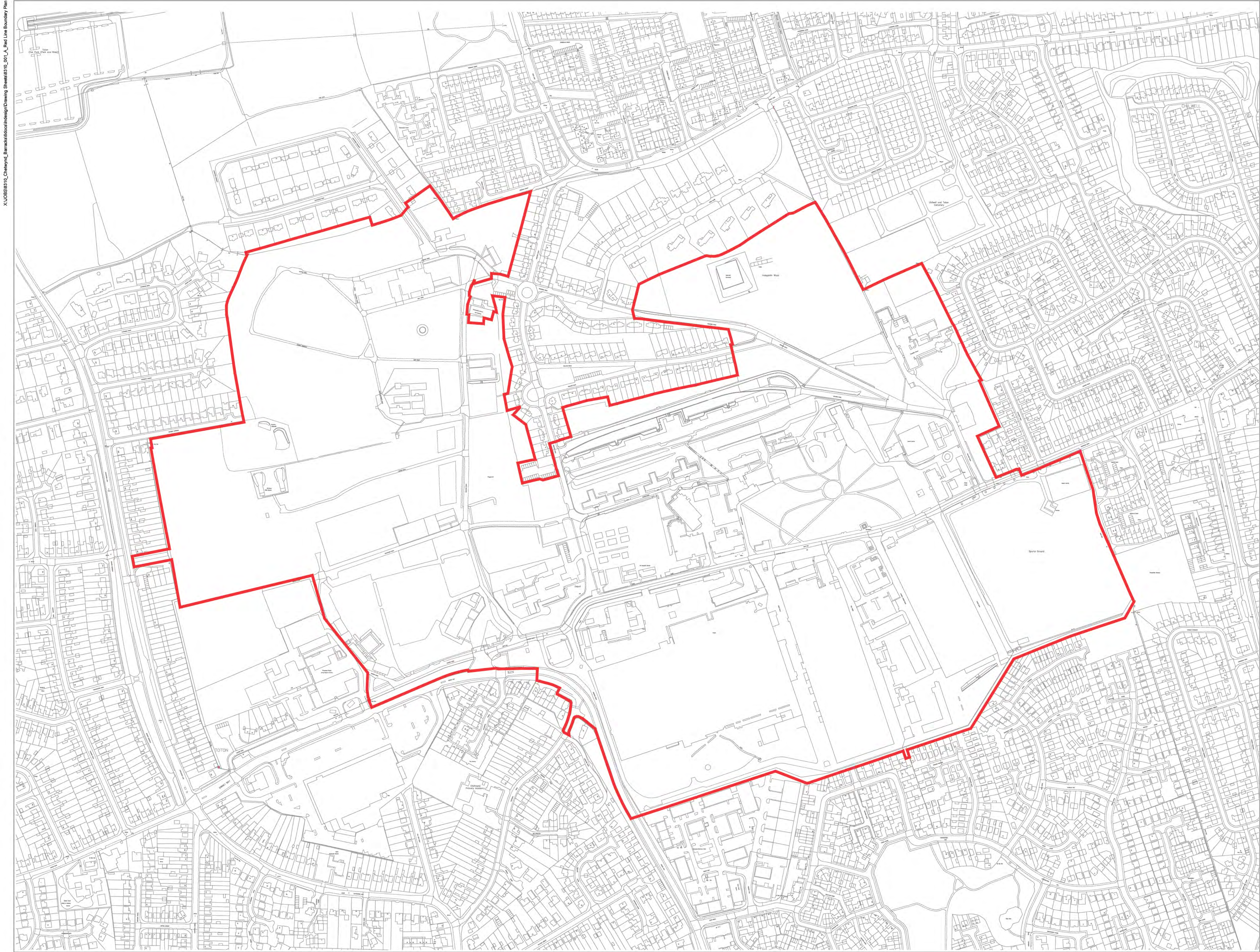


# Appendix I

Homes England / DIO Site Boundary Plan



X:\0889310\_Chetwynd Barracks\docu\design\Drawing Sheets\810\_001\_A\_Red Line Boundary Plan



LEGEND

Site Boundary

READ THIS FIRST

**Note for Contractors**  
This drawing should be considered along with the risk information contained in the CDM Pre Construction Information. This information will include details of the SIGNIFICANT risks which LDA Design has identified which may arise from constructing their designs shown on this drawing. A Competent Contractor should be aware of the typical risks associated with doing this work.

**Note for Workers**  
DO NOT START YOUR WORK unless you know the Risks and Controls relating to the work on this drawing (including SAFE SEQUENCES OF WORK and EQUIPMENT).

**STOP**  
Do not issue copies of parts of this drawing without the above Note for Workers (unless you are sure that the Workers can undertake the work safely).

A	First Issue	STou 13/01/22
REV.	DESCRIPTION	APP. DATE

LDĀDESIGN

PROJECT TITLE  
CHETWYND BARRACKS

DRAWING TITLE  
Red Line Boundary Plan

ISSUED BY	London	T: 020 7467 1470
DATE	Jan 2022	DRAWN JBa
SCALE@A1	1:2500	CHECKED STou
STATUS	Draft	APPROVED STou

DWG. NO. 8310\_001\_A

No dimensions are to be scaled from this drawing.  
All dimensions are to be checked on site.  
Area measurements for indicative purposes only.  
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Sources: Ordnance Survey...

v2018.0



# Appendix II

Homes England / DIO representations to the Toton and Chetwynd Barracks Strategic Masterplan SPD



Our Ref: 01C000793/nch/md12

Your Ref:

13 January 2022

Strategic Masterplan SPD Consultation  
Planning Department  
Broxtowe Borough Council  
Council Offices  
Foster Avenue  
Beeston  
Nottingham  
NG9 1AB

Dear Sir or Madam

## **Toton and Chetwynd Barracks Strategic Masterplan SPD**

### **Representations on behalf of Homes England**

Avison Young is instructed by Homes England to provide advice in respect of the redevelopment of Chetwynd Barracks. Homes England has 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 (SoS) has responsibility. These representations are submitted with the input and agreement of the DIO.

#### **Introductory Points and Pre-Amble**

1. In 2016, Chetwynd Barracks (herein known as the Barracks) was declared surplus to requirements by the Ministry of Defence, although the Barracks currently remain operational. On 25 November 2021, the MoD published its 'Future Soldier' document, which sets out a vision for the future of the Army and, amongst other things, advises that the Royal Engineers that are currently stationed at the Barracks will relocate in future. The DIO expects the Barracks to be vacated by 2026.
2. The Partnering Agreement with the DIO enables Homes England to act as 'master developer' using its project management and investment resources to bring the site forward for redevelopment. As part of this Agreement, Homes England appointed a multi-disciplinary team in August 2020, led by Avison Young, to promote the residential-led redevelopment of the site. Promotion will be by way of the submission of an outline planning application (OPA), supported by a Masterplan, Parameter Plans and Design Code. The OPA will have regard to the content and requirements of Policy 3.1 in Broxtowe's Local Plan Part 2. It will include proposals for the phasing of the development, the mix of proposed uses, and the physical and social infrastructure works that will be required to support the delivery of the new community

on the Barracks. Homes England and the DIO anticipate that the OPA will be submitted in 2022.

3. Homes England has progressed a programme of site surveys and baseline analysis which will inform the preparation and testing of masterplan options and the selection of a preferred masterplan to underpin the OPA. Habitat surveys, a noise survey, a topographic survey, a tree survey, and assessments of the significance of various character buildings have been completed, as has an appraisal of baseline market conditions. Strategic modelling of transportation impacts is ongoing according to a methodology and scope agreed with the local highway authority (LHA) and National Highways. Utilities and ground investigation surveys will be undertaken in 2022.
4. The project team is also engaged in discussions with Broxtowe Borough Council (BBC), Nottinghamshire County Council (NCC), the East Midlands Development Corporation (EMDC), Chetwynd – The Toton and Chilwell Neighbourhood Forum (CTTCNF) and other stakeholders to test and explore issues that will directly influence the redevelopment of the site.
5. The enclosed Site Location Plan indicates the extent of land that will be the subject of the OPA. This comprises nearly all the land in MoD ownership, save for a small parcel at the western end of the site, to the north of HMS Sherwood, which will be retained for continuing military use. We note at this point that many of the figures in the SPD include this land within the site boundary for the Barracks. Accordingly, it is suggested that those figures are updated to reflect the revised site boundary. On a similar point, the red line on the enclosed plan includes the service road access from Stapleford Lane (denoted by the 'protrusion' in the red line along the western boundary). However, this isn't shown on the figures in the SPD. Again, Homes England requests that the figures are updated to reflect the true extent of the site boundary.
6. The red line also excludes two areas of service family accommodation (SFA) at the northern end of the site, which are under the control of Annington Homes rather than the DIO. They will not form part of the OPA.
7. As noted above, the OPA will have regard to the relevant content of the Local Plan Part 2, in particular Policy 3.1: Chetwynd Barracks and its supporting text and Policy 3.2: Land in the vicinity of the HS2 Station at Toton SLG. The Local Plan Part 2 establishes that the submission of the OPA should be made in the context of the preparation of the Strategic Masterplan SPD. As such, Homes England welcomes the SPD's preparation.
8. In October 2020, an initial consultation exercise was carried out by BBC and NCC ahead of the preparation of the draft SPD. That consultation comprised of a 'virtual room' with boards grouped around various themes. We provided representations to that consultation on behalf of Homes England, and these representations, where appropriate, build on points in that letter.
9. It is with these introductory points in mind that we submit these representations. We structure our representations so that they, first, comment generally on the purpose of the SPD, its

preparation, and its relationship with the OPA process. We then turn to comment on specific content in the draft document.

### **General Observations**

10. The SPD may be adopted before the OPA is submitted, or determined, and, if so, the SPD will be a material consideration in the determination of the OPA.
11. It is stated more than once, in both the Executive Summary and the main body of the draft document, that the SPD is intended to be a *"flexible framework"* that is not intended to be prescriptive, but instead seeks to guide and inform detailed masterplanning decisions by developers. The draft SPD does contain a 'Spatial Framework', the purpose of which is to establish, *"the broad structure for development... and the distribution of key uses, consistent with the development plan requirements"*. But, helpfully, and consistent with the references to the SPD being a 'flexible framework', this is later described as an, *"indicative diagram"*, which will enable, *"the alignment of the routes and the precise locations of buildings [to] be determined through the planning application process"*.
12. Homes England welcomes the clear explanation that the purpose of the SPD is not to establish a prescriptive masterplan for the Barracks. This is entirely appropriate given that: a) while the SPD has been informed by work undertaken by The Environment Partnership and Mott MacDonald, there is no published 'evidence base' accompanying the document; whereas b) Homes England and its project team are assembling a thorough, robust body of evidence, that will underpin the content of the OPA masterplan in relation to matters of scale, infrastructure, broad arrangement of uses etc.
13. The draft SPD comments on its relationship with other processes and planning documents, including the Local Plan Part 2 and the emerging Neighbourhood Plan (NP) being prepared by CTCNF. In our representations to the 2020 consultation, we said that it would be helpful for the SPD to clarify those relationships, and in particular: a) to confirm that it is subordinate to the Local Plan Part 2; and b) to confirm that it would need to be consistent with the NP. The latter point was made because there was some uncertainty around the timescales for the NP.
14. It is understood that that the Regulation 16 consultation on the NP will take place shortly with the intention that it will progress through examination and (potential) referendum in the first half of 2022. As such, both the SPD and the NP will need to be prepared in the context of the Local Plan. These representations are made having regard to that point.
15. A further general observation is that, since the consultation on the draft SPD was initiated, the Government has published its Integrated Rail Plan (IRP) for the North and Midlands. The IRP has confirmed that Phase 2b of HS2, which comprised of the eastern leg of the network between Birmingham and Leeds, will not proceed. Instead, HS2 trains will run from the West Midlands to East Midlands Parkway on a high speed line (instead of the previously proposed HS2 hub station at Toton), before continuing to Nottingham, Derby and Sheffield via the Midland Main Line, which is to be upgraded. In addition, the IRP reports that Government will seek to promote *"transport improvements"* at Toton. However it is Homes England's understanding that the precise detail of what those improvements will look like remains to be



confirmed (and, according to the IRP, will rely on private sector investment alongside Government spending).

16. Homes England notes the publication of the IRP and that it will have implications for the Toton Strategic Location for Growth (SLG) given the latter was linked to the delivery of the HS2 rail hub at Toton Sidings. Homes England notes that BBC has subsequently published a short note that comments on the IRP. This states that, *"The principles within the SPD relating to movement/access, green and blue infrastructure, and a drive to bring forward exemplary integrated development and infrastructure remain valid"*. It goes on to say that BBC will continue to engage with EMDC and / or those promoting development on sites within the coverage of the SPD to explore in more detail the implications of the IRP. BBC has concluded that it should, though, press on with the consultation on the draft SPD.
17. Homes England notes that BBC, EMDC and, we assume, NCC, will be considering the implications of the IRP for the SLG. However, Homes England's position at the time of the preparation of these representations is that the content of the IRP, and any implications of the IRP for development at Toton SLG, would not appear to have any direct influence over the form, or programme for delivery of, development at the Barracks.
18. Whilst we would not wish to speculate on the implications for the SPD of the IRP, we presume that there will be consequences for some of the assumptions made in relation to the proposals for Toton Sidings. From Homes England's perspective, we would, first, welcome an explanation as to how the SPD may be updated to reflect these changed circumstances, once the consequences of the IRP for the SPD area are known. Secondly, Homes England would like clarification on how the affected parts of the SPD may be applied in the interim period.
19. The final general observation that Homes England wishes to make is that on 10 November 2021, the Environment Act 2021 received Royal Assent and became law. Amongst other things, the Environment Act makes provisions for Government to mandate specific quantitative gains in biodiversity (although the mechanisms for achieving this will need to be secured through the preparation of secondary legislation). We note this given the emphasis that the draft SPD places on achieving sustainable outcomes and on protecting and enhancing biodiversity.

#### **Observations on Specific Content**

20. In the following paragraphs, we set out Homes England's observations on the specific contents of the draft SPD. For ease of reference, we comment on the chapters / section headings in the order that they are found in the SPD.

#### **Existing Land Uses**

21. Paragraphs 2.4 to 2.6 comment on existing uses at the Barracks. They recognise the presence of SFA on land controlled by Annington Homes, *"which is to be retained and sensitively integrated into the proposals"*. Homes England welcomes the recognition that the Annington Homes land will not form part of the OPA.

22. At Paragraph 2.5, the draft SPD advises that, *"the site's military use results in a legacy of ground contamination, which will need to be addressed as part of the planned redevelopment"*. The accompanying Figure 10 shows, diagrammatically, the presence of infrastructure and contamination on the Barracks. Various, it indicates the presence of unexploded ordnance, heavy metals, radioactive chemicals, and asbestos on the site. However, there is no reference to the evidence base that informs or supports the contents of Figure 10. Homes England is commissioning a full suite of intrusive ground investigation works as part of the development of its masterplan, and so ahead of that work being completed, it considers it is premature for the SPD to incorporate a diagram purporting to show the location of contamination on the site. Homes England would prefer for Figure 10 to be removed, or at least for content relating to contamination be deleted.

#### Movement, Access and Connectivity

23. Policy 3.1 of the Local Plan Part 2 requires development at the Barracks to 'positively facilitate' the development of a link road between the site and the NET Park and Ride facility to the north.
24. Homes England and its project team has held several discussions with NCC (in its role as both local highway authority (LHA) and stakeholder in the SPD) and EMDC about the way in which the OPA will satisfy the requirements of Policy 3.1 relating to the link road.
25. It is apparent from those discussions that the primary objective of NCC and EMDC in delivering a link road (or, at least, the section between the Barracks and the NET station, rather than the section to the north which acts as a bypass to the Bardills roundabout) is to provide user choice. The primary objective is, therefore, not to address significant capacity issues on Stapleford Lane, although by providing user choice, there will be some effect on traffic conditions on that road. It is with that in mind that Homes England notes the reference in Paragraph 2.21 of the draft SPD that Toton Lane / Stapleford Lane are *"relatively congested"*. We comment further on matters relating to the link road in subsequent paragraphs.
26. Homes England notes and supports the statement in Paragraph 2.24 that there are *"opportunities"* to improve accessibility to public transport as part of the OPA for the site. Homes England expects that its masterplan will demonstrate how the arrangement of uses, location of access points, and on-site infrastructure, will deliver enhanced accessibility to public transport.
27. Separately, Homes England notes that Figure 12 shows an 'existing' access point to the Barracks on its southern boundary, close to properties on Mountbatten Way. This is not a site access, and so the annotation on Figure 12 is erroneous, and should be removed.

#### Green and Blue Infrastructure

28. Paragraph 2.26 identifies existing green infrastructure assets at the Barracks and states these *"notably"* include Hobgoblin Wood, the memorial gardens, and sports pitches. The SPD reinforces the requirement of Policy 3.1 for development proposals to retain these features (and which Homes England expect to be a feature of its masterplan).

29. However, the same paragraph notes that there are areas of *"historical woodland"* on the site, *"which have since been cleared"*. Moreover, the draft SPD states that *"proposals could seek to bring back these areas of woodland and incorporate them into the design of the wider green infrastructure network"*.
30. It is not immediately apparent which areas this statement refers to, and the reprographic quality of accompanying Figure 14 makes interpretation difficult. It appears Figure 14 may identify an area of 'historic woodland' that straddles the southern boundary of the site, to the south of Building 157. If that is correct, then we note that: a) that part of the site currently comprises of open areas of hardstanding, and the camp circuit road; and b) land on the other side of the boundary has been developed and now accommodates the Chetwynd Business Park. Moreover, a requirement to re-plant previously cleared woodland would go beyond the scope of Policy 3.1 (the focus of which is on the retention and enhancement of existing assets). Homes England therefore believes the reference to re-planting of cleared woodland should be removed.
31. A further observation is that the Field Close Open Space, annotated as number 3 on Figure 14, is outside of the control of the DIO.
32. In relation to blue infrastructure, Paragraph 2.27 notes that the de-culverting of the existing watercourse on the site *"would help create a sense of place"*. Homes England generally agrees with this proposal. However, it is yet to complete a survey of the culverted watercourses that cross the site, hence, any suggestion in relation to the approach to the culverts seems premature. Homes England therefore considers that the SPD ought to refer to de-culverting as an 'opportunity' or 'potential outcome'.

#### The Historic Environment

33. Paragraphs 2.30 to 2.33 acknowledge that the military use of the site gives rise to *"an interesting and valued historic environment"*. Homes England agrees with this general view. The draft SPD identifies six heritage assets:
- a. the Shell Filling Factory Memorial (which is the only listed building / asset on the site);
  - b. the former Red Cross nurses' building;
  - c. Woodside House;
  - d. Williams Barracks;
  - e. the 'command centre' (also referred to as Building 125); and
  - f. the Filled Shell Factory (also referred to as Building 157).
34. Figure 16 identifies these assets on a plan. However, Figure 16 also annotates the Sergeant's Mess (located close to the existing entrance to the site) as a heritage asset, although this not referred to in the associated text. Homes England assumes that its identification on Figure 16 is an error and suggests that it be removed.



35. In addition, Figure 16 indicates that, while Building 157 may be demolished, its footprint should be retained as part of any redevelopment proposals. The evidence that Homes England is assembling will help it and its project team to reach views on the strategy that is to be pursued in relation to such matters, and which will be explored through engagement with BBC's Conservation Officer, and with other stakeholders. The suggestion that the footprint of Building 157 should be retained is one option, but there may be others of equal or greater merit.
36. For that reason, Homes England thinks it is premature for the SPD to state that the footprint of Building 157 will be incorporated into development proposals (certainly without acknowledging that there may be other appropriate options). It is considered that this represents a level of prescription that goes beyond a 'flexible framework'.

Summary of Opportunities

37. Paragraphs 2.35 to 2.43 provide a summary of 'opportunities' across both the Barracks and the Toton SLG. Homes England's comments on each of those opportunities are as follows.
- **Net-zero carbon development:** Homes England agrees with an aspiration for development in the masterplan area to deliver "*net-zero carbon*" outcomes. Homes England will take opportunities in its development proposals to contribute to this objective. It will seek to submit an application for development that is policy compliant, is in accordance with the principles of Building for a Healthy Life and the Future Homes Standard and is prepared having regard to positive place-making outcomes, viability and deliverability. It is important to also note that Homes England hope to submit the OPA in 2022, but with details reserved for later determination (through the approval of reserved matters). It will be those reserved matters submissions where specific, fine-grain details in relation to net-zero carbon development will be set out.
  - **Boosting connectivity through world class connectivity:** the text under this heading refers solely to HS2. As we have noted, that will no longer proceed, but in any event, need not have any consequence for the redevelopment of the Barracks.
  - **Biodiversity and nature recovery:** Homes England agrees that there is an opportunity to achieve net gains in biodiversity through redevelopment, and notes that the draft SPD is not prescriptive about the quantum of net gain that should be targeted. Homes England will be preparing its masterplan with an over-arching objective of delivering a net gain in biodiversity. Homes England is, of course, aware of the relevant content of the Environment Act, and that a 10% net gain will be prescribed in due course, once secondary legislation has been prepared. This matter will be discussed with BBC as part of the preparation of the OPA.
  - **Connecting existing communities:** Homes England supports the general objective of ensuring new development is connected to its surroundings and promotes journeys by foot and by bicycle. The OPA will seek to achieve this.

- **Providing new homes for local people:** Homes England agrees that the redevelopment can make a significant contribution to the delivery of new housing in the area. The OPA will be framed by a series of parameters, which will include ensuring that the maximum amount of housing that can be accommodated on the site, having regard to: a) the need to provide various infrastructure and non-residential uses; and b) the physical constraints of the site.

Paragraph 2.40 also states that development may provide an opportunity for development to promote the use of innovative methods of construction. Homes England is supportive of the inclusion of modern methods of construction (MMC) across the Barracks and will look to optimise opportunities for its inclusion where possible. This will be undertaken in conjunction, and working closely, with key stakeholders.

- **Maximising existing assets and integrating them into development:** Homes England's masterplan will seek to retain existing important green infrastructure assets and is assembling evidence that will inform decisions around building retention and conversion. Homes England therefore generally supports this opportunity.
- **New schools, community and health facilities:** Homes England agrees that there is an opportunity to accommodate new facilities within the development to contribute to the new and existing community and to support place-making objectives as prescribed by Policy 3.1. The masterplan will make provision for a new primary school, a medical facility and a new neighbourhood centre. The scale and distribution of those uses is currently being tested and will have regard to site constraints and opportunities, viability analysis and an appraisal of market demand.
- **New job opportunities for residents:** Policy 3.1 specifies that proposals at the Barracks should include "*small scale employment development*". Homes England will be exploring the delivery of employment floorspace – in relation to its scale, location and type – as part of the OPA process. In doing so, it will have regard to up-to-date evidence base, market considerations and demand, impact on the capacity of the site for housing (and other infrastructure) and, of course, on securing the best design and place-making outcomes. It should also be noted that employment opportunities will also arise from the neighbourhood centre.

#### Vision and Principles – Creating a Net-Zero Community

38. Paragraphs 3.8 to 3.15 note the challenges associated with delivering net-zero carbon outcomes. Homes England supports the text in the SPD that says that proposals should, "*maximise their contribution to supporting the transition to net-zero*".

#### Development Principles for Toton and Chetwynd Barracks

39. This section of the draft SPD identifies eight principles that are said to "*provide the framework for realising the aspirations*" as set out elsewhere in the SPD. These principally flow from the

opportunities described above. Homes England thinks that these principles are generally consistent with the principles that it is looking to adopt in the OPA masterplan.

#### Key Fixes

40. The draft SPD establishes a series of 'Key Fixes'. Paragraph 3.30 explains that some of these 'fixes' comprise of site features that are to be retained, and which the SPD assumes will be excluded from the developable areas of sites.
41. However, other 'fixes' appear to be driven by policy and are *"defined by reference to a prescribed amount of land for certain facilities or uses"*. A general observation is that identifying 'fixes' seems incompatible with the stated aim of the SPD operating as a 'flexible framework'. At the very least, it seems premature to identify 'fixes' before assessing the new infrastructure that is required to support the development and enable positive place-making outcomes to be achieved. Constraining the delivery of new infrastructure by identifying 'fixes' is at risk of constraining best masterplanning and design outcomes.
42. It is with this observation in mind that we note that the accompanying Figure 22 shows, diagrammatically, the 'fixes' and also various 'other policy requirements'. For the Barracks, two annotated 'fixes' are shown, which are: i) existing green infrastructure, comprising of the Memorial Gardens, Hobgoblin Wood and a section of tree planting on Williams Road, north of Williams Barracks; and ii) the two areas of SFA on the Annington Homes land. The diagram also shows 'heritage buildings', comprising of the Sergeant's Mess, Building 125, Woodside House, Williams Barracks, the Red Cross building, and, it seems, the substation on the fringe of the Memorial Gardens. It is not clear whether these are to be treated as 'fixes' or if they are shown on Figure 22 for some other reason. If the intention is to show 'heritage buildings' as fixes, then Homes England would not support the identification of specific buildings to be retained. This is on the basis that:-
- a) there is no evidence to underpin any content in the SPD about the retention of buildings, such as commentary on their significance, or their ability to be converted to alternative use;
  - b) such an approach would not be consistent with the objective of presenting the SPD as a 'flexible framework'; and
  - c) Homes England is assembling its own evidence base that will support the OPA and which will inform its discussions with BBC and its consultees, and other stakeholders including CTCNF.
43. Homes England therefore proposes that, to aid precision and clarity, annotations relating to 'heritage buildings' should be removed from Figure 22.
44. A similar point arises in relation to green infrastructure. Although some green infrastructure is shown as a 'fix', other existing green areas on the site are shaded green, with the grassed areas in the western part of the site shown in light green (denoting 'green infrastructure') and the sports pitches and various areas of woodland / extended tree planting shaded dark green (denoting 'Required Green Infrastructure').



45. There is no commentary in the text on pages 42 and 43 to explain the distinction between the two types of shading, or to explain why the playing pitches, or the area of woodland in the north-western part of the site, are not shown as 'fixes', despite earlier sections of the text confirming the expectation that these will be.
46. Homes England therefore thinks that Figure 22 must be labelled as 'indicative', so that it is clear that it will be for individual planning applications to include evidence-based proposals relating to green infrastructure and heritage assets.

Layer: Green Infrastructure

47. Following the 'fixes', the draft SPD presents a suite of 'layers'. These are different to fixes and are intended to be *"things which will need to be provided to build up a successful and comprehensively-developed new community"* (Paragraph 1.10, second bullet).
48. The first layer is 'Green Infrastructure'. This is said to comprise of three elements: i) the retention and enhancement of existing open spaces; ii) the provision of new, multi-functional open spaces; and iii) the delivery of new pedestrian and cycle links that aid accessibility to green infrastructure networks. Paragraph 3.38 states that the SPD takes *"an integrated approach"* to green infrastructure, where green spaces are 'combined' with *"streets, walking and cycling routes"*. Homes England is supportive of this general principle and aspiration.
49. Figure 23 identifies existing green spaces on the Barracks site, and in each case, identifies its 'typology' as well. Further, it shows a series of 'proposed green corridors'.
50. While Homes England is generally content with the identification of existing green infrastructure and proposed green corridors, it is important that the SPD makes clear that the contents of Figure 23 are indicative, and that it will be for planning application process to show how the green infrastructure proposals will be implemented.
51. Notwithstanding this, Homes England notes that the north-south link is shown as a proposed green corridor and is denoted as an 'urban boulevard'. This should be reviewed, given Homes England's discussions with NCC (in its role as LHA) about the design and alignment of that link (about which we comment on more below).
52. Similarly, Figure 23 shows a proposed green corridor extending from Hobgoblin Wood, in a north-westerly direction, and into land controlled by Annington Homes, which then links to another corridor running on an east-west alignment between Field Lane and Toton SLG. Given that the delivery of this depends on more than one landowner, Figure 23 should be labelled as 'indicative' and not be fixed.
53. Paragraphs 3.39 to 3.42 describe a 'Green Infrastructure Framework Plan', which comprises of a series of 'design principles' and three 'key elements'. Homes England is supportive of the design principles. However, in relation to the 'key elements', the second is said to be the formation of a *"multifunctional green infrastructure corridor"* connecting Hobgoblin Wood to the

south of Toton SLG. For the reasons given above, Homes England believes that that the alignment shown in Figure 23 should be annotated as being indicative and not fixed.

Layer: Movement

54. Figure 25 sets out a 'Movement Framework Plan'. In respect of the Barracks, it shows three types of streets, which are: a) boulevards; b) local streets; and c) neighbourhood streets. It also shows the alignment of pedestrian and cycle links, the position of pedestrian and cycle-only accesses, the location of bus gates, and a possible vehicular access from Stapleford Lane (albeit this is caveated to say that it is subject to technical work). It also appears that the diagram shows two vehicular accesses from Swiney Way.
55. Homes England believes that Figure 25 should also be clearly labelled as indicative. This is because the access and movement strategy that Homes England adopts in its OPA will be led by evidence base, detailed discussions with BBC and NCC (as LHA), and that it will be subject to robust testing. In contrast, the accesses and alignments shown on Figure 25 are not underpinned by evidence, and it is important, to fulfil the objective of creating a 'flexible framework', that the labelling of Figure 25 reflects this.
56. Paragraph 3.51 says that a "central part" of the movement layer is the creation of a transport network that is "*well integrated into surrounding communities and provides a choice of sustainable transport modes*". Homes England is supportive of this approach, and its OPA and masterplan will contribute positively to this objective.
57. Paragraph 3.63 goes on to say, that, notwithstanding that aspiration, "*there is still a need for roads*". It is in this context that Paragraphs 3.64 to 3.66 discuss the need for upgrades to the local highway network, with specific reference made to the provision of the north-south link, the 'facilitation' of which is required by Local Plan Policy 3.1.
58. Acknowledging the provisions of Policy 3.1 in this regard, Homes England and its project team has, as we noted earlier: a) been exploring how the OPA can facilitate a link road; and b) testing its conclusions with Officers from BBC and NCC since the beginning of the year. It is with that in the mind that Homes England makes the following observations.
59. Figure 25 shows the alignment of the link road, comprising of: i) a section between Stapleford Lane and the A52, which bypasses Bardills Roundabout; and ii) a section that branches off that route at the NET site, before heading through the Annington Homes land at Northfield Crescent, and then south through the Barracks along Readman Road, ending at Swiney Way. The key to Figure 25 advises that the road should be designed as an 'urban boulevard' (and which is consistent with the annotation on the Green Infrastructure Framework Plan).
60. Paragraph 3.65 states the section of the link road that will connect Stapleford Lane to the A52 will facilitate access to the Toton SLG site. The same paragraph goes on to say that, "*the latter route will continue to Swiney Way via Chetwynd Barracks and will help avoid significant increases in congestion on the A52, Stapleford Lane and around Bardills island*". However, Paragraph 2.21 describes Stapleford Lane as "*relatively congested*". Thus, our reading of Paragraph 3.65 is that

it is saying that the section of the link between Swiney Way and the north of the Barracks is intended to mitigate potential increases in congestion (from new development).

61. As such, and based on advice from Officers at NCC (as LHA), the primary purpose of that section of the link road is to provide greater transport choice and permeability, with any relief to Stapleford Lane being a consequential benefit. We suggest that Paragraph 3.65 ought to be reviewed accordingly.
62. The draft SPD refers to Policy 3.1 and the requirement for development on the Barracks to 'positively facilitate' the link road, although Paragraph 3.66 describes this as the "*minimum*" outcome. Reference is made also to Paragraph 3.4 of the Local Plan (which forms part of the supporting text to Policy 3.1); the draft SPD says that the requirement to facilitate the link road "*relates to the site as a whole*".
63. This leads Homes England to note that land controlled by Annington Homes will not form part of the OPA. Of course, Homes England will ensure that its proposals fully contribute to the objective of delivering a link road by providing a link between Swiney Way and the boundary with the Annington Homes land. The road will be capable of safe use by all road users, and will serve its primary function, which is to enhance user choice (with consequential benefits to Stapleford Lane). As such, Homes England suggests that the commentary in the draft SPD could be amended to say the following,
- "The requirement to facilitate the link road applies to any planning application for development which is submitted and which relates to land that is required to deliver any part of the link road. It is, of course, recognised that applicants can only be expected to meet this requirement within land that is in their control".*
64. Similarly, Paragraph 3.66 states that BBC "*expects*" the OPA to demonstrate how the link road will 'embed' the aspirations for the formation of an urban boulevard on the Barracks site. In this regard, Figure 25 indicates that this would in the form of a 'direct' route between the northern and southern boundaries.
65. It is important to comment here on the work that Homes England has undertaken to ensure that its proposals will: i) satisfy the requirement to positively facilitate the link road, and the primary function of that to increase transport choice, as confirmed to Homes England by NCC; whilst ii) ensuring that the design of the new road is fully compatible with the delivery of a high-quality residential development that will meet the design and place-making objectives of Homes England, DIO and, of course, BBC and other stakeholder authorities.
66. The topographical survey undertaken by Homes England has, however, confirmed that the changes in levels around Readman Road are very significant. At its steepest point, the site rises at a gradient of 1 in 8. In contrast, NCC's Highways Design Guide (2021) confirms that 'main streets' or 'residential streets' should achieve a gradient of no more than 1 in 20. The existing levels on the site would preclude the outcome of the link road having a straight alignment, as suggested in Figure 25.



67. The work undertaken by Homes England's project team has concluded that a 1 in 20 gradient can be achieved if the road has an alignment that traverses, on the diagonal, the existing levels between Swiney Way and the point at which the MoD's ownership adjoins the boundary with the Annington Homes land. This arrangement is entirely compatible with the proposed function of the link road. Moreover, it will enable the link road to have the character of an 'estate road' with a 30 mph design speed. This is entirely compatible and consistent with its role as part of the new residential neighbourhood through which it will pass, and to which it will provide access for cars, buses and other road users between the northern and southern boundaries.
68. In contrast, if the link road were to be aligned as shown on the diagram in the SPD, it would be incompatible with its role within the new neighbourhood. Moreover, Homes England would have concerns about the safety of a route on a straight alignment and with a gradient of 1 in 8 and which would not meet standards in the Design Guide.
69. Homes England's approach would 'positively facilitate' the link road because it would:-
- a) provide a vehicular route between Swiney Way and the Annington Homes land, thereby enabling future sections of the road to be connected to it if third party land becomes available;
  - b) be designed to accord with NCC's Highways Design Guide; and
  - c) achieve the objective of increasing user choice and permeability between Swiney Way and Stapleford Lane.
70. Homes England has tested the principle of this outcome with: NCC in its role as LHA (in a meeting on 14 January 2021); with BBC in a pre-application meeting on 8 February 2021; and with NCC, Arup and Mott MacDonald in relation to the SPD in a meeting on 17 February 2021. In all cases, the authorities agreed that this approach would comply with the requirement of 'positively facilitating' the link road that is written into Policy 3.1.
71. Drawing the above points together, Homes England's position is that the form of the 'estate road' described above would meet fully the transportation role that it is expected to perform, would support the delivery of a high-quality residential neighbourhood, and would be policy-compliant, evidence-based and deliverable. It would deliver a route that Paragraph 3.66 describes as being of, "*fundamental importance*". In contrast, no design or technical evidence has been produced to demonstrate that a 'boulevard' on a straight alignment is feasible or deliverable.
72. Accordingly, Homes England proposes that the content of the SPD relating to the link road should be reviewed and amended to confirm that the alignment of the section that passes through the Barracks will be designed having regard to the significant changes in levels through the site, and to ensure that it is compatible with, and fully supports, the delivery of the exemplar new residential development that the local authorities, CTCNF and Homes England and DIO wish to see.

73. Beyond the Link Road, Paragraph 3.67 expands on the annotation on Figure 25 of a 'potential' access from Stapleford Lane. It indicates that technical work must be undertaken to demonstrate that an access onto Stapleford Lane is "*necessary*". This comment is supported by four bullet points, which seek to define the scope of that technical work.
74. Homes England considers that an access from Stapleford Lane could comprise an appropriate element of the overall access strategy for the Barracks. Homes England is, therefore, testing the capacity of any access from Stapleford Lane. With that in mind, it notes firstly that there is no requirement in Policy 3.1 to apply a test of 'necessity' to an access in this location. Secondly, any proposal in the OPA to form an access onto Stapleford Lane will be underpinned by evidence to demonstrate that it can operate safely and, thirdly, Homes England would ensure that an access from Stapleford Lane is integrated into its access and movement strategy, so that consideration would be given to the types and numbers of vehicles that might use such an access. Fourthly, work undertaken by PBA in 2017 to support the promotion of the site by DIO to the Local Plan Part 2 concluded that an access from Stapleford Lane could serve development in the western part of the site, and so the principle of providing an access from Stapleford Lane has already been examined.
75. Accordingly, Homes England proposes that the SPD should simply note that any access that the OPA proposes from Stapleford Lane must be thoroughly tested and included only as part of the overall access strategy, alongside the primary access from Swiney Way.
76. Homes England also notes that Figure 25 shows access points on land controlled by Annington Homes and which is outside the control of DIO, and which will not form part of the OPA.
77. A final observation is that at least some of the content of the Movement layer is said to be informed by a 'Local Connectivity Study' prepared by Mott Macdonald. However, the Study has not been made available to review alongside the draft SPD. Homes England thinks that the Study should be published, as it is likely to provide important context to the proposals in the Movement layer.

#### Spatial Framework

78. Figure 27 provides a 'Spatial Framework', which "*aggregates the fixes and layers*" found in earlier sections of the draft SPD.
79. Consequently, the points we have raised in relation to the fixes and layers (including the need for the figure to be labelled as 'indicative') also apply here. There is no need for us to repeat those points, other than to say that Homes England believes the content of Figure 27 must be amended to take account of these representations.

#### Character Areas

80. The SPD defines 'character areas' for each site, "*within which defined types of development can come forward*". A general point is that an approach that seeks to 'define' the types of development that can come forward in particular areas is plainly inconsistent with the

objective of establishing a flexible framework. On the other hand, Homes England notes, and welcomes, the confirmation that the SPD *"does not specify which land uses should be located next to one another"* (Paragraph 4.4). The general distribution of uses will, of course, be tested through the preparation of OPAs.

81. In the case of the Barracks, three such areas are proposed: Chetwynd West, Chetwynd East and Chetwynd South.

- **Chetwynd West** is described as a *"primarily residential area"* but also a location where *"some community facilities"* (which the final bullet point on Page 67 says means the primary school and medical facility) may be delivered given that it is expected to be first part of the site to be delivered.

Homes England notes that this is a different position to that expressed in Policy 3.1 of the Local Plan Part 2, which states that both the school and medical facility should be located close to the retained playing pitches at the eastern end of the site. Therefore, the commentary on Chetwynd West, as drafted, is inconsistent with Policy 3.1.

The SPD should recognise the content of Policy 3.1 in this regard, and that the distribution of uses, and the phasing of the development, will be rigorously tested as part of the OPA process. Indeed, Homes England's project team is engaged with NCC in its role as local education authority (LEA), and with the Nottingham and Nottinghamshire Clinical Commissioning Group (CCG) in discussing how these elements can be best brought forward.

A further 'design consideration' is the *"provision of a new through route between Swiney Way and Toton"*. It is important to note that the test in Policy 3.1 is that development 'positively facilitates' the route, and that should be reflected in the wording of the SPD. We do not need to repeat the points in relation to the form and alignment of that route but will reiterate that the extent of DIO's ownership is such that a route can only be facilitated between Swiney Way and the boundary of DIO's land with the Annington Homes land.

In relation to residential uses, the first 'design consideration' says that development will be of *"lower densities, primarily comprising terraced, semi-detached and detached houses, with higher densities to the south near Chetwynd Road"*. Homes England is unsure on what basis the draft SPD promotes 'lower densities', having regard to the expectation in the Local Plan that the site will deliver 1,500 dwellings, or indeed how 'lower densities' is defined given the lack of evidence to support such an approach.

It is therefore important that the SPD does not constrain unnecessarily the flexibility that is needed in relation to the housing typologies to be delivered in the Chetwynd West character area.

- **Chetwynd East** will, the draft SPD says, *"be heavily influenced by retained military heritage"*. Homes England does not disagree with that general view, given it is this



character area in which the listed Memorial, the Memorial Gardens, and buildings of potential heritage significance, are located.

One of the design considerations for this character area is the *"sensitive conversion of key military buildings to residential."* Homes England thinks it important to note here that the retention and conversion of buildings will be informed by: i) an assessment of their cultural and historical significance; ii) an assessment of their feasibility and readiness for conversion; and iii) market analysis on likely suitable uses for retained / converted buildings, with all those issues to be thoroughly examined and evidenced via the OPA. Consequently, the SPD should say that the OPA process will explore the potential for conversion and retention and should not be prescriptive about the types of uses that might be accommodated in any retained building.

A similar point applies in relation to the reference to the creation of a 'heritage trail'. The way in which development responds to the heritage of the site is a matter that is most appropriately dealt with through the preparation of the OPA, having regard to the evidence base. Homes England would therefore prefer that reference to a 'heritage trail' is removed.

The commentary confirms that this character area will accommodate residential development and a new centre comprising of retail and other community uses *"catering for local needs"*. Homes England generally supports this statement.

The commentary also confirms that the new primary school and medical facility may be in Chetwynd East, *"if these can be delivered in parallel with the initial phases of development across both Toton and Chetwynd Barracks"*. This statement raises three points for Homes England.

First, the Toton SLG and the Barracks sites are in different ownerships and we have not been advised through engagement with BBC, NCC and EMDC of the programme for the SLG which might be different to that proposed by Homes England. Consequently, the delivery and phasing of the school and medical facilities on the Barracks should not be linked with or constrained by SLG delivery.

The second point is that, as we have noted above, the phasing of development at the Barracks will be very carefully examined, having regard to viability, market demand, engagement with the LEA and CCG, and place-making outcomes.

The third point, and which is linked to the second, is that the school could also be located in Chetwynd South, having regard to place-making objectives, and noting that doing so would also comply with the requirement in Policy 3.1 for the school to be *"in close proximity"* to the existing pitches.

The conclusion this leads to is that the SPD should not be prescriptive about which uses are to be provided in which character area but should instead say that uses 'could'

or 'might' be in one or more character areas, with the distribution of uses and phasing to be assessed through the OPA process.

Finally, the design considerations also refer to "*lower densities*". Homes England repeats its above comments about how 'lower densities' are defined, and the apparent lack of evidence to support restrictions on density in this part of the site. Again, Homes England would encourage the SPD to take a flexible approach to the densities and typologies to be delivered in this character area.

- **Chetwynd South** is again an area that the draft SPD says will be "*primarily residential*" and Homes England supports this.

The design considerations for this area say that development ought to "*make provision of between 2 and 3.5 hectares of land for small scale employment development*" (i.e. uses falling into use class E(g)). Homes England recognises the policy requirement in Policy 3.1 but proposes that the SPD acknowledges that the OPA will test the location, scale and type of employment use having regard to: the most up-to-date evidence base; evidence of demand and market considerations; impact on housing capacity; the amount of commercial floorspace delivered in the neighbourhood centre; and on securing the best design and masterplanning outcomes.

A further design consideration is that development will 'integrate' the culverted watercourse south of Building 157 into a SuDS and green infrastructure network. Homes England is supportive of this aspiration and expects its masterplanning process to test its feasibility. However, Homes England notes that the text goes on to say that the watercourse should be integrated with the "*restoration of Moor Wood*". We are unsure which part of the site 'Moor Wood' refers to but speculate that it is the 'historic woodland' shown on Figure 14. If that is correct, then we repeat our earlier point that a requirement to re-plant woodland would be inconsistent with Policy 3.1. Homes England thinks this statement needs to be amended accordingly.

In relation to the residential element of this character area, the first design consideration says that development could include "*terraced houses, maisonettes and low-rise apartments*". Given that the OPA will be informed by viability testing, which will consider the likely mix having regard to an appreciation of the local market characteristics, Homes England thinks it is important that the SPD is explicitly flexible around the types of housing that might be provided in this character area, to ensure deliverability of development.

Finally, we have noted in our commentary on Chetwynd East that the primary school could be located in Chetwynd South. For the SPD to meet its objective of being a flexible framework, Homes England thinks it ought to refer to the possibility of the school being located in Chetwynd South, whilst acknowledging that the OPA process will put forward an evidence-based approach for its eventual location.

Development Phasing

82. Section 5 of the draft SPD comments on the phasing of development and the delivery of infrastructure. Paragraph 5.7 lists *"physical infrastructure interventions"* that are *"likely"* to be required by 2028 (that is, the end of the current plan period). Of relevance to the Barracks, these include:-
- i) the new link road between A52 and Swiney Way;
  - ii) the green infrastructure corridor between Hobgoblin Wood and Toton Lane; and
  - iii) new access points.
83. We have commented on each of those matters in these representations and so do not need to repeat those points. However, suffice it to say:-
- a) Homes England is promoting an approach that will deliver a new estate road between Swiney Way and land controlled by Annington Homes, which will provide access to retained SFA and which will also be capable of connecting to future sections of the link road when those are delivered by others;
  - b) the delivery of the green infrastructure corridor between Hobgoblin Wood and Toton Lane is reliant on land in multiple ownerships, and the SPD should acknowledge this; and
  - c) Homes England will develop an access and movement strategy, founded on a robust evidence base that will inform the contents of the OPA masterplan in relation to access and egress for a range of transport modes.
84. Paragraph 5.11 addresses education provision and reinforces that the primary school to be delivered at the Barracks could be accommodated in either Chetwynd West or Chetwynd East. It indicates that the planning application process will need to assess *"the suitability and deliverability of locating the school in both character areas"*, having regard to *"place-making outcomes and accessibility"*.
85. As we have noted throughout these representations, the OPA (through the masterplan and the phasing of development) will be tested rigorously and be informed by engagement with BBC and the LEA. That said, the project team pays significant regard to Local Plan Policy 3.1, which is explicit about the location of the education and medical facilities being in *"close proximity"* to the Memorial Gardens (i.e. in Chetwynd East).
86. Moreover, Paragraph 5.11 reiterates the points made in the commentary on the Character Areas that a primary school at Chetwynd is needed to serve both development at the Barracks and development at Toton. As we have already stated, no evidence has been made available to support the view that delivery of a school at Chetwynd should be linked to the delivery of development at Toton. We therefore repeat Homes England's request that the references to linkages in the SPD are removed in favour of wording that says that phasing of facilities will be determined during the OPA process, having regard to the views of the LEA and to place-making outcomes.



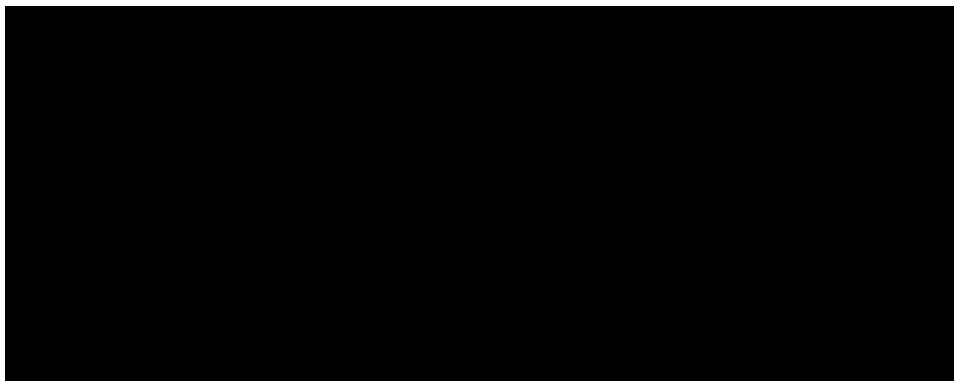
87. Paragraphs 5.14 and 5.15 refer to healthcare provision and make very similar comments to Paragraph 5.11. Accordingly, the same point applies. Indeed, the project team is engaged with the CCG and, at the time of writing, discussions continue around the scale of medical facility that may need to be provided on the Barracks. Rather than the current wording of Paragraph 5.15, the SPD should instead say that delivery of the new facility at the Barracks should be informed by discussion with the CCG and having regard to place-making objectives.
88. Paragraphs 5.16 and 5.17 address the delivery of 'other' community facilities. Homes England's only observation is that Paragraph 5.17 states that 'Chetwynd High Street' (i.e. the new centre) will be located in the Chetwynd South character area. That is inconsistent with the statement in Section 4 of the SPD that the centre will be provided in Chetwynd East. This reiterates the point that the SPD should not, and need not, be prescriptive about where the centre is located.
89. Without repeating points already made, the OPA process will test the appropriate locations for the centre, and may include locations across both character areas, or in one or the other. By being less prescriptive, the SPD would maintain its objective of being a 'flexible framework'.
90. Paragraphs 5.18 and 5.19 discuss the stewardship of woodland, green infrastructure, and open space. In short, the SPD says that long-term stewardship *"must be secured in perpetuity"* as part of the OPA. Homes England acknowledges this and expects the OPA process to identify and secure outcomes in relation to stewardship.
91. Finally, Paragraphs 5.20 to 5.22 discuss meanwhile uses, noting that they could *"play a role in early place-making"* by allowing vacant buildings to be temporarily occupied before development comes forward. Homes England agrees that meanwhile uses can make a positive contribution in this way.
92. Currently, Paragraph 5.22 states that *"all major development proposals will be required to submit a Meanwhile Feasibility Study at the planning application stage"*. The purpose of this, it is said, is to, *"identify whether the land or buildings affected by the development proposal are appropriate for meanwhile uses"*. Homes England is not convinced of the merits of obliging applicants to submit feasibility studies with planning applications. The preparation of the OPA (and the masterplan underpinning it), will, we anticipate, generate a conclusion on the merits of buildings being used for meanwhile uses, having regard to: a) the phasing of development; b) the identification of buildings to be retained and the buildings to be demolished; and c) the possible means of, and programme for, site disposal. Homes England thinks that the SPD would be more effective by providing support for meanwhile uses and advocating the submission of feasibility studies where promoters want to test potential temporary uses, rather than mandating their preparation.

## **Summary**

This letter has set out Homes England's comprehensive representations on the draft version of the Strategic Masterplan SPD. Should Officers wish to discuss any of the points raised in this letter, then please do not hesitate to contact Nick Hardy ([nick.hardy@avisonyoung.com](mailto:nick.hardy@avisonyoung.com)) or Miles Drew ([miles.drew@avisonyoung.com](mailto:miles.drew@avisonyoung.com)) of this office.



Yours faithfully



Enc.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 July 2022 12:12  
**To:** Policy  
**Cc:** [REDACTED]  
**Subject:** Consultation on the Toton and Chilwell Neighbourhood Plan  
**Attachments:** 220719 Toton and Chilwell NP.pdf

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FAO Planning Policy Team

Hi,

Please find attached the formal response from National Highways in relation to the above referenced consultation.

Regards

[REDACTED]

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21 July 2022

Dear Sir / Madam,

### **Consultation on the Toton and Chilwell Neighbourhood Plan**

National Highways welcomes the opportunity to comment on the Toton and Chilwell Neighbourhood Plan, which covers the period 2020 to 2040. We note that the document provides a vision for the future of the area and sets out several key objectives and planning policies which will be used to help determine planning applications.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Toton and Chilwell Neighbourhood Plan, our principal interest is safeguarding the operation of the A52 and M1 which route to the north and west respectively of the Neighbourhood Plan area.

National Highways most recently provided comments in May 2022 on the growth aspirations in this region through consultation on the Toton and Chetwynd Barracks Strategic Masterplan SPD.

From review of this Neighbourhood Plan, we note consistent growth aspirations such as the HS2 East Midlands Hub and the new direct highway connection to the A52 to the north of Bardills Roundabout. As such, to maintain consistency in our advice, our response to this Neighbourhood Plan aligns with our May response to the SPD.

Th growth aspirations at Toton do not appear to have been updated to account for the HS2 East Midlands Hub station no longer being situated at Toton. We therefore expect that the development aspirations, and potentially transport infrastructure proposals, will change from that set out in this consultation, however this should be clarified.

The Neighbourhood Plan aims to deliver growth supporting net zero carbon ambitions, with shared living and working spaces, and local centres in both Chetwynd and Toton providing sustainable transport, retail and service facilities.

We note the highway infrastructure proposal to serve the masterplan site via new junction onto the A52 located approximately 500m to the north of the Bardills roundabout. Although multiple connections to a particular highway link can be necessary to enable high demands from the local urban area to flow out onto the highway link, increased permeability of a strategic link such as the A52 can present major concerns.

The A52 serves as the major strategic link for long distance trips into Nottingham via the M1. The A52 between the M1 and Nottingham city centre is already congested due to high strategic demands, as well as serving its secondary purpose as a local commuter link road connecting the west of Nottingham area with the wider city. The provision of an additional junction onto the A52 will accommodate increased traffic flows onto a severely strained strategic link.

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. Decision to grant or refuse permission will not be made by National Highways, but by the DfT.

An additional concern is that this proposed junction will 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. This proposal will require an application for Departures from Standards to be approved.

National Highways is concerned that the delivery of this new connection to the A52 shall have a detrimental impact on journey times, reliability of the SRN to serve both local and long distance trips, as well as highway safety.

We have no further comments to provide at this stage but reiterate that National Highways is committed to continued engagement with the Local Planning Authority to agree an approach for any future mitigation needed on the A52 to support the delivery of the growth aspirations.

Yours sincerely,

[Redacted signature]

[Redacted signature]

[Redacted signature]





[REDACTED]

---

**From:**

**Sent:**

[REDACTED]  
02 August 2022 13:44

**To:**

**Subject:**

[REDACTED]  
RE: Extension to Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation  
16 Consultation

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello [REDACTED],

The ICB's response to this consultation would be to ensure that within the Infrastructure or Housing and Sustainability sections is that developers should be aware when submitting planning applications for housing developments to allow for Section 106 monies for provision for Primary Healthcare.

Kind regards

[REDACTED]



**NHS**  
Nottingham and  
Nottinghamshire

[notts.icb.nhs.uk/](https://notts.icb.nhs.uk/)  
[@nhsnotts](#)

Telephone: Due to the current situation I am working from home – please email me with your query and I will respond as soon as possible  
[nnicb-nn.estates@nhs.net](mailto:nnicb-nn.estates@nhs.net)

Head office: Sir John Robinson House, Sir John Robinson Way, Arnold, Nottingham, NG5 6DA

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Sent: 22 July 2022 11:09

**To:** estates (NHS NOTTINGHAM AND NOTTINGHAMSHIRE ICB - 52R) <nnicb-nn.estates@nhs.net>  
**Subject:** Extension to Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation 16 Consultation

Dear Sir or Madam,

**CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION**

The Chetwynd: The Toton and Chilwell Neighbourhood Forum has submitted its Neighbourhood Development Plan ('Neighbourhood Plan') to Broxtowe Borough Council.

A Neighbourhood Plan is a community-led framework for guiding the future development and growth of an area. It may contain a vision, aims, planning policies, proposals for improving the area or providing new facilities, or allocation of key sites for specific kinds of development.

Broxtowe Borough Council is now inviting comments on this Plan.

Details of where to view the documents, and how to respond, are set out in the Consultation Notice (further below) or on our website: <http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan>.

**The Borough Council has taken the decision to extend the deadline for the public consultation until Friday 5<sup>th</sup> August 2022; all representations must be received within this time.**

Yours faithfully

Broxtowe Borough Council

**TOWN AND COUNTRY PLANNING ACT 1990  
(AMENDED BY THE LOCALISM ACT 2011)**

**NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS AMENDED)  
SUBMISSION OF THE NEIGHBOURHOOD DEVELOPMENT PLAN FOR THE CHETWYND: THE TOTON AND CHILWELL  
NEIGHBOURHOOD AREA (THE "CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN"):  
CONSULTATION UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS  
AMENDED)**

Notice is given, that on 24<sup>th</sup> November 2021, a draft neighbourhood development plan (the "Chetwynd: The Toton and Chilwell Neighbourhood Plan") was submitted to Broxtowe Borough Council, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

**The 'plan proposal'**

In accordance with Regulation 16, Broxtowe Borough Council is now consulting upon the draft Chetwynd: The Toton and Chilwell Neighbourhood Plan. The following documents are available on our website at [www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan):

- Chetwynd: The Toton and Chilwell Neighbourhood Plan;
- Chetwynd: The Toton and Chilwell Neighbourhood Plan Policies Map;
- Map of the area covered by the Neighbourhood Plan;

- Notice of the Consultation;
- Consultation Statement;
- Basic Conditions Statement;
- Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report, Screening Opinions from Historic England and Natural England, and Final Conclusions;
- Strategic Environmental Assessment (SEA) produced by AECOM on behalf of the Neighbourhood Forum;
- Plan Modifications (April 2020); and,
- Supplementary Plan Modifications (October 2021)

### **Submitting Representations under Regulation 16**

If you would like to make comments on the Neighbourhood Plan proposals, please email your comments to Broxtowe Borough Council at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk). A response form is available on our website at: [www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan).

You can also post a copy of your comments to Broxtowe Borough Council at:  
Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation,  
Planning Policy Team,  
Broxtowe Borough Council,  
Council Offices,  
Foster Avenue,  
Beeston,  
Nottingham,  
NG9 1AB.

Paper copies of the form are also available at the locations listed below.

A paper copy of the Neighbourhood Plan and related documents is also available to view at the Reception of Broxtowe Borough Council's Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB (during normal opening hours). Copies of the response form are also available at the same location.

**The consultation will run from Wednesday 8<sup>th</sup> June until Friday 5<sup>th</sup> August 2022 (extended from Friday 22<sup>nd</sup> July 2022). All responses must be received within this time.**

Any representations may include a request to be notified of the local planning authority's decision under regulation 19 in relation to the neighbourhood development plan. Therefore, please confirm within any representations whether you would like to be notified when a decision is taken by the Borough Council on whether or not to 'make' the plan (i.e. if it is adopted as Council Policy under Regulation 19).

If you require any further information or assistance in relation to this public consultation or the Neighbourhood Plan document, please do not hesitate to contact the Planning Policy Team on **0115 917 3452 or 3015**. You can also email us at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

### **Data Protection**

Please note that the comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 July 2022 17:08  
**To:** Policy  
**Cc:** [REDACTED]  
**Subject:** Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation Response  
**Attachments:** Consultation Response 1 - North-South Access Road.pdf; Consultation Response 2 - Bus Services.pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

With reference to your email of 10<sup>th</sup> June 2022, concerning the above, please find attached the comments of Nottingham City Council, as Promoter of Nottingham Express Transit.

Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

Website: [www.nottinghamcity.gov.uk](http://www.nottinghamcity.gov.uk)  
Facebook: [www.facebook.com/mynottingham](https://www.facebook.com/mynottingham)  
Twitter: [www.twitter.com/mynottingham](https://www.twitter.com/mynottingham)

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# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	Nottingham City Council
Address	<input type="text"/> <input type="text"/> <input type="text"/>
Postcode	<input type="text"/>
E-mail address	<input type="text"/>

**Comments should be received by 5<sup>th</sup> August 2022**

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes

☒

No

☐

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

**[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)**

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**Please return completed forms to:**

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).



- 1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

Section 14, POLICY INFO2

- 2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☐

Support with  
modifications ☐

Oppose ☐

Have Comments ☒

**Please give details of your reasons for support/opposition, or make other comments here.**

It will 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.

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.

# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	Nottingham City Council
Address	<input type="text"/> <input type="text"/> <input type="text"/>
Postcode	<input type="text"/>
E-mail address	<input type="text"/>

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Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes

☒

No

☐

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For more information please visit:

**[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)**

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Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

- 1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

Section 14, POLICY INFO7

- 2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☐

Support with  
modifications ☐

Oppose ☐

Have Comments ☒

**Please give details of your reasons for support/opposition, or make other comments here.**

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 tramstops.

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 05 August 2022 11:40  
**To:** [REDACTED]  
**Subject:** Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation 16 Consultation

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

Thank you for consulting Nottinghamshire County Council on the above Plan.

## General

We note that the Neighbourhood Plan relates to the proposals in the adopted part 2 Broxtowe Local Plan in relation to the Chetwynd Barracks and Toton area. It deals primarily with the wider Toton and Chilwell neighbourhood but touches upon the area covered by the Toton-Chetwynd Masterplan SPD which was published by the Council in October 2021. This Masterplan will guide the Toton-Chetwynd strategic development area. This Masterplan SPD (on which the County Council has responded separately) forms the key document to guide strategic development and will be adopted by the Borough Council in due course. The Toton and Chilwell Neighbourhood Plan should be finalised in the context of this document, given the strategic importance of the Toton-Chetwynd growth area and it would therefore be best for it also to be independently examined following adoption of the Masterplan SPD so that the relationship of the Neighbourhood Plan policies and Masterplan SPD guidance is fully understood.

## Hub Station at Toton

The Plan refers to HS2 and the proposal for a Hub station at Toton. The announcement concerning the Integrated Rail Plan in November 2021 has of course changed this matter and indicates that the Government now supports the HS2 new railway line extending to East Midlands Parkway and will serve Nottingham and Leeds on existing rails, with Toton instead being served by a sub-regional rail station, subject to developer funding being obtained. The Plan needs to be updated as it is not expected to be able to deliver the Toton Hub proposal in light of this announcement.

## Minerals and Waste

We have no specific concerns about this Plan from a minerals and waste planning perspective.

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.

## Public Transport

The Transport Act 1985 places a duty on Nottinghamshire County Council to secure a "Socially necessary" bus network. Local bus operators provide services that they consider as commercial, and the Council provide subsidies

to enhance the commercial network to ensure communities have access to key services including education, work, health, essential shopping and leisure.

The level of revenue funding available to the Council to provide supported services is diminishing. Therefore, other funding sources are required to enable the council to maintain a socially necessary and sustainable network. Developer funding for the provision of local bus services, bus stop facilities and other sustainable transport measures to serve new planning sites is important to support and promote a vibrant and sustainable community.

Having reviewed the plan vision, objectives, opportunities and Neighbourhood Plan Policies, there is support for the general emphasis on sustainable transport, development and encouraging the use of public transport.

5.4 - It is 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.

7.22 - is noted which explains that the consultation sessions highlighted the need to improve public transport via new east-west links through the Barracks to both Stapleford Lane (and on to HS2), and the tram terminus at Toton Lane.

10.22 – supported 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 transport provision - more local bus services and more bus stops.

14. Infrastructure/Getting Around - we support the 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”

Policy INF09 - it is noted that this refers to technological solutions to reduce travel demand (car sharing, car clubs) and demand-responsive public transport.

Policy INF07 – it is noted that all development of the Strategic Location for Growth (SLG) and Chetwynd Barracks should preserve, enhance and encourage re-routing of bus services through the Area.

## National Bus Strategy

In March 2021 the government published its document ‘Bus Back Better: national bus strategy for England’ <https://www.gov.uk/government/publications/bus-back-better>, as part an initiative to build back better services post pandemic. The strategy requires Local Transport Authorities to implement ambitious bus priority schemes and draw up ambitious Bus Service Improvement Plans (BSIPs).The County Council published a BSIP in autumn 2021: <https://www.nottinghamshire.gov.uk/transport/public-transport/bus-service-improvement-plans-for-nottinghamshire> and an Enhanced Partnership was implemented in June 2022.

The Strategy requires the provision of economically necessary bus services, including a new duty on Local Transport Authorities to improve people’s access to employment at all times of the day and night. The aspirations set out in the 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.

## Community Transport

Community transport services are provided in the plan area by The Helpful Bureau, Stapleford. It is suggested that reference to their work is 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), taxi buses.

Taxis

There is 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. It is suggested reference to the role of taxis is included in the plan.

## General

It is not made clear how the Neighbourhood Plan relates to the Toton/Chetwynd Masterplan SPD which Broxtowe issued for consultation in October 2021. There is potential for confusion and it would be helpful to be clear how the two documents should be read together in terms of the overlaps with the Toton-Chetwynd strategic development area which is a key project of the East Midlands Development Company, which is to become a Development Corporation with associated planning responsibilities.

We hope these comments are helpful



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**Sent:** 22 July 2022 11:05

**Subject:** Extension to Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation 16 Consultation

Dear Sir or Madam,

CHETWYND: THE totON AND CHILWELL NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION



The Chetwynd: The Toton and Chilwell Neighbourhood Forum has submitted its Neighbourhood Development Plan ('Neighbourhood Plan') to Broxtowe Borough Council.

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Yours faithfully

Broxtowe Borough Council

**TOWN AND COUNTRY PLANNING ACT 1990  
(AMENDED BY THE LOCALISM ACT 2011)  
NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS AMENDED)  
SUBMISSION OF THE NEIGHBOURHOOD DEVELOPMENT PLAN FOR THE CHETWYND: THE TOTON AND CHILWELL  
NEIGHBOURHOOD AREA (THE "CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN"):  
CONSULTATION UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS  
AMENDED)**

Notice is given, that on 24<sup>th</sup> November 2021, a draft neighbourhood development plan (the "Chetwynd: The Toton and Chilwell Neighbourhood Plan") was submitted to Broxtowe Borough Council, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

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- Map of the area covered by the Neighbourhood Plan;
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- Supplementary Plan Modifications (October 2021)

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Planning Policy Team,  
Broxtowe Borough Council,  
Council Offices,  
Foster Avenue,  
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NG9 1AB.

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 July 2022 13:53  
**To:** Policy  
**Subject:** RE: CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN  
REGULATION 16 CONSULTATION

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Dear Broxtowe Borough Council,

Thank you for inviting Nottinghamshire County Council in its capacity as Highway Authority to provide comment on the draft Toton and Chilwell Neighbourhood Plan. We offer the following comments:

Whilst the Neighbourhood Plan (NP) has been put together with both the Aligned Core Strategy and Local Plan Part 2 in mind, it should also compliment the Toton and Chetwynd Barracks Strategic Masterplan (SM) produced by the East Midlands Development Company. An area where these documents conflict is on the issue of on-street parking provision. The NP advocates off-street parking should be provided on an actual rather than theoretical basis to reduce on-street parking, whereas the SM seeks to minimise the level of provision below current standards.

Toton Sidings is no longer being used to facilitate the expansion of HS2. At this stage, it is not known what will replace the Hub or what this will mean for the wider site. It may be worthwhile considering that piecemeal development will not be supported until the overall development aspirations have been finalised by the SM

Para 9.17 refers to a new north/south link road between the A52 and A6005. This is incorrect. The intention is for the link road to meet Swiney Way from which the A6005 can then be reached.

It is assumed the new north/south link road will help relieve some of the congestion on surrounding streets. 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.

Any works to improve junction performance will be determined by Transport Assessment. 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.

No reference has been made with regards to Nottinghamshire County Council's Highway Design Guide. Any future masterplan should be compliant with this document to ensure road layouts are properly designed and adopted as public highway.

Kind regards,

[REDACTED]

[REDACTED]

This advice has been offered in good faith, but is an informal opinion only, given on a without prejudice basis, that does not commit the Highway Authority to any action, recommendation, or decision.

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Sent: 10 June 2022 10:00

Subject: CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION

Dear Sir or Madam,

## **CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION**

The Chetwynd: The Toton and Chilwell Neighbourhood Forum has submitted its Neighbourhood Development Plan ('Neighbourhood Plan') to Broxtowe Borough Council.

A Neighbourhood Plan is a community-led framework for guiding the future development and growth of an area. It may contain a vision, aims, planning policies, proposals for improving the area or providing new facilities, or allocation of key sites for specific kinds of development.

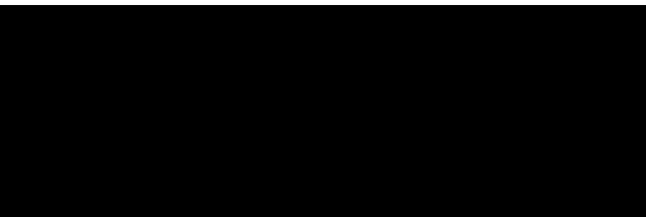
Broxtowe Borough Council is now inviting comments on this Plan.

Details of where to view the documents, and how to respond, are set out in the Consultation Notice (further below) or on our website:

<http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan>.

The consultation period will run from **Wednesday 8<sup>th</sup> June 2022 to Friday 22<sup>nd</sup> July 2022**; all representations must be received within this time.

Yours faithfully





**TOWN AND COUNTRY PLANNING ACT 1990  
(AMENDED BY THE LOCALISM ACT 2011)  
NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS  
AMENDED)  
SUBMISSION OF THE NEIGHBOURHOOD DEVELOPMENT PLAN FOR THE  
CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD AREA (THE  
“CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN”):  
CONSULTATION UNDER REGULATION 16 OF THE NEIGHBOURHOOD  
PLANNING (GENERAL) REGULATIONS 2012 (AS AMENDED)**

Notice is given, that on 24<sup>th</sup> November 2021, a draft neighbourhood development plan (the “Chetwynd: The Toton and Chilwell Neighbourhood Plan”) was submitted to Broxtowe Borough Council, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

**The ‘plan proposal’**

In accordance with Regulation 16, Broxtowe Borough Council is now consulting upon the draft Chetwynd: The Toton and Chilwell Neighbourhood Plan. The following documents are available on our website at [www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan):

- Chetwynd: The Toton and Chilwell Neighbourhood Plan;
- Chetwynd: The Toton and Chilwell Neighbourhood Plan Policies Map;
- Map of the area covered by the Neighbourhood Plan;
- Notice of the Consultation;
- Consultation Statement;
- Basic Conditions Statement;
- Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report, Screening Opinions from Historic England and Natural England, and Final Conclusions;
- Strategic Environmental Assessment (SEA) produced by AECOM on behalf of the Neighbourhood Forum;
- Plan Modifications (April 2020); and,
- Supplementary Plan Modifications (October 2021)

**Submitting Representations under Regulation 16**

If you would like to make comments on the Neighbourhood Plan proposals, please email your comments to Broxtowe Borough Council at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk). A response form is available on our website at:

You can also post a copy of your comments to Broxtowe Borough Council at:  
Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation,  
Planning Policy Team,  
Broxtowe Borough Council,  
Council Offices,  
Foster Avenue,  
Beeston,  
Nottingham,  
NG9 1AB.

Paper copies of the form are also available at the locations listed below.

A paper copy of the Neighbourhood Plan and related documents is also available to view at the Reception of Broxtowe Borough Council's Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB (during normal opening hours). Copies of the response form are also available at the same location.

**The consultation will run from Wednesday 8<sup>th</sup> June until Friday 22<sup>nd</sup> July 2022. All responses must be received within this time.**

Any representations may include a request to be notified of the local planning authority's decision under regulation 19 in relation to the neighbourhood development plan. Therefore, please confirm within any representations whether you would like to be notified when a decision is taken by the Borough Council on whether or not to 'make' the plan (i.e. if it is adopted as Council Policy under Regulation 19).

If you require any further information or assistance in relation to this public consultation or the Neighbourhood Plan document, please do not hesitate to contact the Planning Policy Team on **0115 917 3452 or 3015**. You can also email us at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

### **Data Protection**

Please note that the comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link:  
<https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

**A large print version of this notice is available on request.**

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**From:** [REDACTED]  
**Sent:** 29 July 2022 11:50  
**To:** Policy  
**Subject:** CTC Neighborhood Plan consultation  
**Attachments:** chetwynd-toton-chilwell-neighbourhood-plan-regulation-16-consultation-form\_NWT.docx

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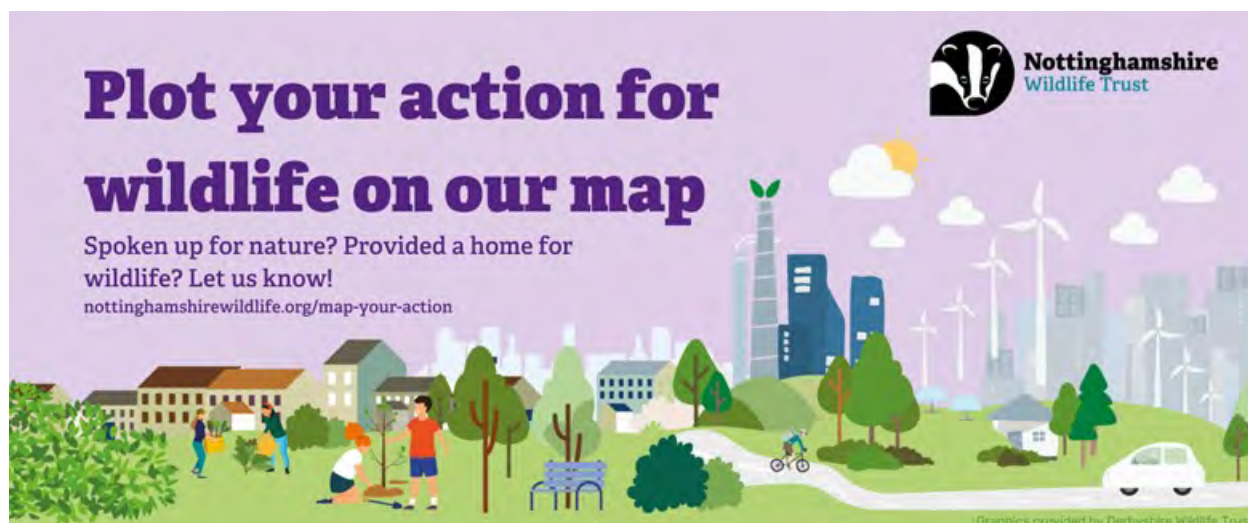
Dear Planning Policy Team

Please find our attached observations on the plan.

Kind regards,

[REDACTED]

[REDACTED]



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# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> :
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	Nottinghamshire Wildlife Trust
Address	<input type="text"/>
Postcode	<input type="text"/>
E-mail address	<input type="text"/>

Comments should be received by 5<sup>th</sup> August 2022

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes

☐ Y

No

☐

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)

**Data Protection** - The comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

Please return completed forms to:

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).



- 1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

**Pages 55-68**

**Environment Core Objectives and Supporting Policies**

- 2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☒

Support with  
modifications ☐

Oppose ☐

Have Comments ☒

**Please give details of your reasons for support/opposition, or make other comments here.**

We support all Core Objectives and all supporting policies (ENV01-08) and supporting text/ evidence base (pages 58-65)

In relation to Policy ENV 7, we query if the term green landscape plan has a formal definition. If not, we suggest using Biodiversity-focused (or Biodiversity-led) Landscape (Master)Plan, or similar wording might be more appropriate.

The Policy EN7 supporting justification paragraph mentions enhancing future management in the context of road verges and including wildlife 'features' in built environment, such as bird and bat boxes/ bricks etc. To help secure this, we suggest that the requirement for a 'Landscape and Ecological Management Plan' (LEMP) for any new development and associated open space is additionally included within the policy requirements. Post-construction monitoring and reporting on the success of habitat creation is important and often overlooked. We recommend this be secured by Policy ENV7.

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 03 August 2022 19:42  
**To:** Policy  
**Subject:** Toton & Chilwell Neighbourhood Plan consultation  
**Attachments:** NP Reps July 2022 FINAL.pdf; NP Reps September 2019 FINAL.pdf; Representation to BBC T and C Master Plan DECEMBER 2021.pdf

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Sir/Madam

I attach representations regarding the above on behalf of Peveril Homes Limited. Could you confirm receipt?

Thanks

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Ref: SPS/0013

Date: 5<sup>th</sup> September 2019

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Sir/Madam,

Toton & Chilwell Neighbourhood Forum: Neighbourhood Plan

We represent Peveril Homes Limited and Peveril Securities Limited with regard to the submission of Representations in response to the recently published Toton and Chilwell Neighbourhood Plan.

Generally our clients are supportive of the Plan but feel that a number of issues would benefit from clarification or revision.

These comments relate to the following:

- 6 – The changing Face of our area
- 8 - The Core Objectives
- 9 – The Vision for the Neighbourhood Area
- 11 – Environment
- 12. – Infrastructure /Getting Around

The Aligned Core Strategy (2012) identifies the Strategic Location for Growth for a range of commercial uses together with a minimum of 500 houses. The Part 2 Plan at policy 3.2 and the associated Major Modifications (MM4) identifies a larger Strategic Location for Growth and reinforces that between 500-800 homes will be accommodated to the east and west of Toton Lane. Furthermore, there is reference to an overall capacity of 3,000 homes

As you will be aware our client secured planning permission with regard to land west of Toton Lane (17/00131) . That consent related to the following:

Outline planning application with points of access to be determined for a mixed-use development incorporating a maximum of 500 dwellings, 380 sqm convenience store, two 95 sqm retail outlets, education floor space (maximum 2,300 sqm), day nursery (maximum 450 sqm), pub/restaurant, an 80 bed residential care facility, open space, plot for medical surgery (0.04 hectares), plot for community use (0.08 hectares), highways, drainage, removal of electricity pylons and overhead cables, erection of terminal pylon, demolition of 316 Toton Lane and associated infrastructure.

Furthermore, approval for Reserved Matters with regard to 282 houses (Ref:17/00499/REM) has also been issued. That approval not only related to the houses but also the highway and drainage structure, the extensive public Open Space and safeguarded tram route. Hence, the development of the northern part of the west of Toton Lane component is fixed.

---

[REDACTED]  
[REDACTED]  
[REDACTED]



# Stone Planning Services Limited

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Our clients have also submitted an application for the approval of Reserved Matters with regard the public house, convenience store, day nursery, residential care home and lock up shops.

The Neighbourhood Plan should give greater cognisance to the extant outline planning permission and the subsequent Reserved Matters approval. There is currently minimal reference and no recognition that the outline consent also relates to:

1. Public House
2. Convenience Store
3. Lock up shops (2)
4. Day Nursery
5. Residential care home.

**These will be grouped around a "public space " and adjacent the Toton Lane frontage and the tram route.** It is also very close to the new entrance to the George Spencer Academy and directly across Toton Lane from the tram stop and Park and Ride. It will create a strong community hub. We do not feel this has been considered in the Plan.

The Neighbourhood Plan also ignores the extensive open space within this area. This is considered later in these Representations.

## Route of tram extension

Condition 14 of the outline planning permission 17/00131 provides for a protected corridor to accommodate an extension to the tram. This has been approved by Broxtowe Borough Council following detailed discussion with the relevant highway authorities. Figure 9.3 and 12.1 do not recognise this route and shows a tram route adjacent the A52 through the George Spencer Academy site sweeping down to the proposed HS2 station hub. It would be helpful to understand the basis for this and evidence base as clearly there are ramifications for our client's site.

## HS2

We have been heavily engaged in the HS2 facility and how it has influenced the planning of the broader site. Notwithstanding the overwhelming support for HS2 in Broxtowe there is still no Act of Parliament to confirm its delivery. We understand that a further review has been instigated which is due to report to the new Prime Minister in the autumn.

Ahead of the Review the Secretary of State for Transport stated on 3<sup>rd</sup> September:

*"Regarding schedule, the Chairman does not believe the current schedule of 2026 for initial services on Phase One is realistic. In line with lessons from other major transport infrastructure projects, his advice proposes a range of dates for the start of service. He recommends 2028 to 2031 for Phase One - with a staged opening, starting with initial services between London Old Oak Common and Birmingham Curzon Street, followed by services to and from London Euston later. He expects Phase 2b, the full high-speed line to Manchester and Leeds, to open **between 2035 and 2040.**"*

We strongly urge that the Neighbourhood Plan also considers a without HS2 scenario

## Chetwynd Barracks site

The approval of outline consent 17/00131 relating to our client's site west of Toton Lane was the subject of detailed assessment. The impact on the Highway network attracted



detailed scrutiny and off site works were considered necessary to successfully deliver the development. These works related to Bardills Island, the A52 and Toton Lane. A series of improvements were required on the A52 and south of the site on Toton Lane; namely.

- a. Improvements to Bardills Island and A52 arm
- b. A52 slip road improvements
- c. Pedestrian crossing upgrade at Stapleford Lane/Swiney Way/Bank Road
- d. Microprocessor Control System at the A6005 Queens Road/High Road, Toton junction
- e. Puffin crossing on Stapleford Lane adjacent to Woodstock Road/Spinney Crescent
- f. Right hand junction improvement works at Stapleford Lane/Darley Avenue junction.

We are also aware of local concerns regarding increased traffic flows onto Toton Lane.

Hence a key driver in the formulation of a site Master Plan for the Chetwynd Barracks Site will be the points of access. We consider that Toton Lane is not suitable as a major access to serve a 1500 house scheme.

The County Council has submitted a Housing Infrastructure Fund bid to deliver a new highway link that will relieve the congestion at Bardills Island, improve access to the proposed HS2 station hub and the Strategic Location for Growth at Toton. It will also partially facilitate an access to the Chetwynd Barracks site.

Irrespective of the success of the HIF bid the primary access to the Chetwynd Barracks site should be from the north of the site and thence onto either the new road or Toton Lane/Stapleford Lane adjacent the Park and Ride.

## Road

We note that Figure 9.3 shows an Indicative north- south route from the A52 to Toton Lane. We do not disagree with this as a matter of principle but the route appears to deflect from the Nottinghamshire County Council HIF bid route. It is essential that an accurate representation is made as there are significant implications when assessed together with Figure 9.1 - Green Corridors. Notwithstanding, as stated above the general principle of access to Chetwynd Baracks from the north is supported subject to our comments below.

## Green Corridors

The approved Reserved Matters layout (17/00499/REM) provides an east-west corridor which links the NET crossing point on Toton Lane through to the western boundary en route to the potential HS2 Station Hub. This corridor will be further strengthened by its potential expansion to the south of the hedgeline to incorporate the public footpath. This would be considered as part of a Reserved Matters submission for the southern part of the originally consented site. This corridor is not recognised in Sections 4 and 6.

This corridor is multi functional providing:

1. Strong connectivity for both pedestrians and cyclists on dedicated routes. New footpaths and cycle ways are incorporated in the approved Reserved Matters layout and an alternative route for pedestrians and cyclists is available to the immediate south.
2. Play facilities are provided within the corridor including a MUGA.
3. Attenuation ponds, including pedestrian routes adjacent. These areas are designed to enhance biodiversity.

4. Extensive landscaping throughout the corridor to promote bio diversity and to create an attractive environment.

In addition the Reserved Matters layout also provides for an extensive area of formal play to the north.

There is no recognition of this anywhere in the Plan. Including such should very materially impact on the additional quantum and distribution of green corridors/open space in the Plan Area. There may be an opportunity to re plan the approved corridor as set out in 17/00499/REM and relocate the features further south. As a consequence Figures 9.1 and 9.6 and 11.1 are wholly inaccurate and the text and calculations which supports the figures should be reviewed.

The Plan indicates a desire for a 75 m corridor north to south and an 80 metre corridor east to west with no justification. These widths are excessive and potentially render development both impractical and unviable. It would make objectives in the Plan incapable of implementation. There should be clear justification of:

1. The routing
2. The width
3. The function

It appears that The Forum have assessed Green Corridors in isolation to its other objectives.

Figure 9.6 seeks to overlay green corridors, cycle routes and potential roads and the tram extension. In our view this completely misrepresents the actual impact of the green corridors on development East of Toton Lane and should be reconsidered. It results in small **areas of land being 'trapped' by proposed corridors or new road. It also fails to** sufficiently recognise the existing copse east of Toton Lane and how a more pleasant, functional and viable corridor could be created around this. We believe that it also confuses functional green corridors with **creating a "buffer" for existing residents.**

We object to the green corridors illustrated on Figures 9.1 and 9.6 and 11.1 and to the calculations and specification as set out in Sections 9 and 11. We are happy to discuss this direct with the Forum.

## Community Hub

We note the desire to encourage the development of a community hub which would involve the relocation of the George Spencer Academy and the provision of a new Leisure Centre to serve the south of the Borough. This is ambitious and is dependent on securing an access and sufficient land from private land owners. In addition to site acquisition costs a Secondary School at current rates would cost circa £25-30m to construct and fit out. Viability needs to be demonstrated.

Overall our concerns relate to:

1. No recognition of the extant outline planning consent and the approved Reserved Matters layout for the northern component of land to the west of Toton Lane. We see this as a fundamental flaw in the Plan making process that the Forum has pursued. It significantly affects the baseline. The Part 2 Plan at policy 3.2 and the associated Major Modifications (MM4) with regard to our client's site have been disregarded



## Stone Planning Services Limited

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2. No recognition of the commercial uses which have been approved on the northern component of land to the west of Toton Lane. The Part 2 Plan at policy 3.2 and the associated Major Modifications (MM4) specifically relate to these uses.
3. No recognition of the safeguarded tram route that passes through our client's site.
4. No technical, viability or ownership evidence to support the delivery of a revised tram route as indicated on Figure 9.3 and subsequent figures.
5. Whilst supporting the principle that Chetwynd Barracks should primarily be accessed from the north no evidence is submitted to support the route of road, which is the Housing Infrastructure Bid by Nottinghamshire County Council, on Figure 9.3. Greater precision is required in the Neighbourhood Plan
6. A comprehensive review of the proposed Green Corridors should be instigated for the reasons set out above.
7. The Plan does not consider the possibility that HS2 will be cancelled or modified or delayed. This is a major omission from the Plan and will have very significant implications for how the Strategic Location for Growth will come forward. Its form would be very different.
8. There is no viability evidence to support the Plan's encouragement to relocate the George Spencer Academy and the construction of the Leisure Hub.

Our client is a major stakeholder in the delivery of the Strategic Location for Growth at Toton and the delivery of a satisfactory access to Chetwynd Barracks and has been involved in the broader since its inception. We are happy for further dialogue with the Forum and Borough Council if this will assist in moving this forward.

Should you require any further information then do not hesitate to contact me.

Yours sincerely

[Redacted Signature]

[Redacted Name]

[Redacted Title]

Ref: SPS/0013D

Date: 10<sup>th</sup> December 2021

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Sir/Madam,

Representations: Broxtowe Borough Council's "Toton & Chetwynd Barracks Strategic Masterplan Supplementary Planning Document (SPD)"

Stone Planning Services Limited acts for Peveril Securities Limited. As you will be aware our clients have had considerable involvement in the Aligned Core Strategy and Part 2 Local Plan process and is very familiar with the locality.

The Toton and Chetwynd Master Plan is largely predicated on the closure of Chetwynd Barracks in 2024 and the provision of the HS2 East Midlands Hub at Toton.

The recently published Integrated Rail Plan for the North and Midlands (November 2021) has now confirmed that a HS2 hub will not be constructed at Toton. It indicates that Government will seek to accelerate rail improvements at Toton, but such will only be achieved on a 50:50 funding basis with the private sector. The station will then provide for local and regional services. This is very different in scale, character and attractiveness to investors compared with a HS2 Station.

Sections 1 and 2 of the SPD set out the background and the development context. Whilst much of this is relevant irrespective of the abandonment of the HS2 Hub it will need significant review. Section 3 sets out the Vision and Principles and Section 4 the Character Areas. Figure 28 identifies the Character Areas, and the accompanying text sets out the anticipated delivery from each Area.

As a result of the Rail Plan we believe that the Council needs to reconsider the Master Plan. It is understandably crafted in anticipation that the Toton HS2 Hub will proceed. The aspirations on housing delivery, employment and other community, education and retail uses are unlikely to be forthcoming in the manner and scale anticipated in the SPD.

As a consequence we ask the Council to consider the following:

1. Quantum of Housing

The SPD anticipates a delivery of 4,500 homes and 6,500 jobs within the SPD/Master Plan area up until the mid-2040s.

The Toton North area was anticipated to create a significant employment hub with an Innovation Campus. New homes would be accommodated on upper floors. Photographs within the SPD show high rise buildings and paragraph 4.9 refers to buildings being four to six storeys in height. There is reference to the potential for taller buildings near the Station Hub. Toton North would accommodate a large number of apartments akin to city centre living.

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[REDACTED]  
[REDACTED]

The Toton South area is indicated as being primarily residential with a mix of densities to include terrace houses, maisonettes and low rise apartments with higher densities towards the boulevards.

The Toton West Area refers to medium to high density development and reference is made to a **'significant number of houses' and to buildings four to six storeys high.**

Whilst the actual number of houses anticipated on the area west of Toton Lane is not specified it is clearly well in excess of the extant planning consent (12/00585/OUT) which is for 500 homes. The consented scheme provided a range of family housing which contrasts significantly with the Vision set out in the SPD. The absence of the HS2 Station Hub will dramatically alter the form and character of the resultant development.

In the absence of the Hub which would have attracted employment, education establishments, retail, leisure and residents wanting apartment type accommodation the character of the site will be very different. It will not deliver the anticipated quantum of housing. Ultimately, the Council will need to identify other sites for housing development in the Local Plan Review.

## 2. Availability of land to the west of Toton Lane

The Council will be aware that whilst the Toton HS2 Hub has been abandoned in favour of a more local/regional station the HS2 safeguarding of land remains. As a consequence, Toton South lies within this area and remains fettered until such time as that situation changes.

The outline planning consent for land west of Toton Lane expires in July 2022 and the southern land has not been secured by a house builder and there is no Reserved Matters consent. A new full planning application may be necessary.

Even if the HS2 safeguarding issue can be resolved there will be significant delay in delivering housing.

At 4.10 it is anticipated that Toton South (with Toton East - see below) will deliver 500 homes up to 2028. We consider this to be over ambitious.

The northern section has the benefit of an extant Reserved Matters consent for 282 houses, but no house construction has commenced.

The Rail Plan has provided some clarity, but much uncertainty remains not just with the safeguarded land but also on the northern consented area. The level of uncertainty is such that potential house purchasers will be very cautious until such time as they fully comprehend the environment they will be moving into. Is it a traditional housing site or a revised Innovation Park? The revised Toton Station proposal is not a rail priority and uncertainty will only delay housing delivery until the rail proposals are transparent.

In reality land west of Toton Lane is unlikely to deliver houses for a very considerable time; potentially no delivery for 10 years.

## 3. Japanese Water Garden and Bardills Garden Centre

Our clients own the Japanese Water Garden Site. It is a brownfield site within the green belt. We have long advocated that the site, together with the adjacent Bardills Garden Centre site should be removed from the Green Belt. Notwithstanding its green belt location we strongly feel that it should be included within the SPD area.

As a previously developed site it benefits from the exceptions to "inappropriate development" set out in paragraph 149 of the Framework. To ensure comprehensive planning it should be included within the SPD area.



## 4. Availability of land to the East of Toton Lane

Our client owns land to the east of Toton Lane and is working collaboratively with other owners to deliver a housing scheme. It lies within Character Area Toton East as identified on Figure 28 and considered at paragraph 4.11 which sets out a number of Design Considerations which are set out below:

- Density - we consider the site is suitable for a range of house types
- Green Infrastructure - the site has the capacity to incorporate green infrastructure. There is an existing footpath link from Toton Lane to the northern corner of the Barracks site. However, this leads solely to the Barracks site and is secured to prevent full open public access. The route is unlit and unobserved. A more valuable route to the proposed community facilities to the east can be provided. Green Infrastructure will be provided to the east.
- Green linkages to the Toton Tram Stop - this could be routed:
  - a. Along the new boulevard that will provide access into the Barracks site from the north; and
  - b. A new green route adjacent the existing copse.
- Integration with the retained accommodation on the Barracks site - this is primarily an issue for the redevelopment of the Barracks site.
- Provision of a new access between the A52 and Toton Lane with access into the Barracks site - our clients would incorporate the first section of this link from Toton Lane as an integral part of the residential development.
- Provision of 500 homes between Toton South and Toton East up to 2028 - we have commented earlier of our concerns that housing will not be delivered on Toton South due to the remaining HS2 safeguarding and the purchaser uncertainty. Toton East can deliver houses quickly including part of the proposed road link and the link into Chetwynd Barracks. It can make an early contribution to the 5 year housing supply.

## 5. Access to Chetwynd Barracks

Access to the Chetwynd Areas requires a through route from Swiney Way and Toton. Routeing all traffic onto Swiney Way and or the existing Toton Lane would be impractical. Our client controls land to the north of the Barracks site which would provide access onto the new A52/Toton Lane link road. We are willing to work constructively with the Council to facilitate access to the Chetwynd barracks site.

Overall, we consider that the SPD/Master Plan now requires review. The Rail Plan does not support the delivery of the HS2 Hub at Toton, nor does it promote the HS2 eastern leg any further north than East Midlands Parkway. The SPD will need to be reviewed in the light of this and housing and employment aspirations for the site very significantly reduced. The site will not deliver 4,500 homes and 6,500 jobs.

**Notwithstanding the Rail Plan's** clear decision regarding the HS2 Hub, uncertainty remains. Such uncertainty affects customer confidence. This together with the continued safeguarding of Toton South will fetter housing delivery west of Toton Lane for many years.

Land east of Toton Lane can come forward in the short term and will deliver houses, part of the Toton Lane - A52 link road and potential access to the Barracks site.

## Stone Planning Services Limited

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The Council has struggled to meet its housing targets. The latest Housing Delivery Test indicates that only 83% of target was delivered over the past 3 years. Consequently the Council now has to employ a 20% buffer; its position will deteriorate. The Local Plan Review will need to identify alternative sites to replace the ambitious housing and employment delivery at Toton which will not occur for the reasons set out above.

We trust that you will give consideration to our client's comments. If you require anything else then do not hesitate to contact me.

Yours faithfully

[Redacted signature]

[Redacted name]

[Redacted contact information]

Ref: SPS/0013

Date: 2<sup>nd</sup> August 2022

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Sir/Madam,

## Toton & Chilwell Neighbourhood Forum: Neighbourhood Plan (Vision) 2022

We represent Peveril Homes Limited and Peveril Securities Limited with regard to the submission of Representations in response to the recently published Toton and Chilwell Neighbourhood Plan (Vision) 2022.

As you will be aware we previously commented on the earlier 2019 consultation. Many of these comments are pertinent to the 2022 iteration. They are attached as Appendix 1 and formally submitted with these representations.

We also submit, as Appendix 2, our clients representations with regard to the Toton & Chetwynd Barracks Strategic Master Plan SPD. These were submitted in December 2021 shortly after the publication of the Integrated Rail Plan which confirmed that the HS2 East Midlands HS2 Hub would not be constructed at Toton.

It is against this background that the current iteration of the Neighbourhood Plan should be considered.

### Section A

We consider Figure 4.3 to be misleading. The notation attached to the green shading refers to Green Belt. The majority of the identified land is **NOT within Green Belt. It's status was** changed by virtue of the adopted Aligned Core Strategy and the Part 2 Plan. Furthermore, the Figure does not make reference to the Toton Strategic Location for Growth which we consider to be a serious omission and wholly misleading. This should be rectified; the Aecom Plan is no longer up to date.

### Section B

This refers to the Vision for the Future. It is predicated on the Strategic Location for Growth which in itself is largely focussed on the delivery of the HS2 East Midlands Hub at Toton.

Paragraphs 6.3 to 6.9 refers to the hub. There is no acknowledgement of the Integrated Rail Plan of November 2021 which was agreed by Government. This followed them publication of the Oakervee Review of HS2 in February 2021.

A HS2 STatuion Hub to serve the East Midlands is no longer proposed at Toton. It is to be delivered at East Midlands Parkway. **There may be a more local/regional station but it's scale** and form is unknown. Any delivery would be beyond the Neighbourhood Plan period. This is major omission from the Plan and so significant that the plan is not consistent with the framework. The Plan in its entirety needs review.

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[REDACTED]  
[REDACTED]  
[REDACTED]



## Paragraph 9.5 again refers to Character Zones, and refers to “East Midlands Hub Station”

(Outside the Forum Area) . This is highlighted on Figure 9.5. Similarly Figure 10.1.

The character and development zones are all driven by the construction of an East Midlands HS2 Station Hub. There is 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. We consider that the nature and form of development will be very different in a no HS2 Hub scenario. And that is the reality following Government announcements.

Policy ENV03 relates to open space and green corridors. It envisages green corridors up to 80 metres wide. This is excessive . It is a cordon sanitaire, not a corridor. The green corridor will be provided for:

1. Pedestrians
2. Cyclists
3. Horses
4. Biodiversity and wildlife.

Eighty metres is very excessive and totally unjustified. 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 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 the route of the new road that would link Toton Lane with the A52, and so reduce **pressure on the Bardill’s Island**, would pass through this land. The County Council has recently submitted a Government bid to secure some funding for its construction. Private sector contributions would be required. If there is no incentive to develop then private sector funding will not be forthcoming and the road will not be constructed. Public benefits would be lost.
3. Hinder the provision of access to the Chetwynd Barracks site. The northern access into the Barracks is dependent on the new road being constructed and landowners then agreeing to access the barracks. Again, if there is no incentive to build because the majority of their land is green corridor then the Barracks site will have to go forward without a northern access. That would have major implications for the local highway network in Toton and Chilwell. This has not been considered in the Plan.
4. Not taken into account the changing movement patterns of the Barracks if redeveloped. Pedestrians currently walk along an unlit dark path along the southern **boundary of the Toton site. It’s** point of connection with Toton Lane does not and would not be consistent with the future crossing points of Toton Lane. A diagonal corridor from the barracks site to the crossing point would be appropriate. That does not require a 80 metre wide corridor.

A maximum Twenty metres wide corridor will deliver a highly sustainable corridor which meets the objectives of the Plan.

Paragraph 37 of the Framework requires Neighbourhood Plans to meet the “basic conditions’ and “other legal requirements” as set out in Paragraph 8 of Schedule B of the Town and Country Planning Act.

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One such basic requirement is for the Plan to have regard to National Policy. It should also be in general conformity with Strategic Local Policy. The Plan's policies should be aligned with the strategic needs and priorities of the area. It is our view that if the Neighbourhood Plan persists 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 is inevitably flawed.

The Plan should be reconsidered without the Toton HS2 Station Hub. Its presence or absence is fundamental to the plan being positively prepared, justified, effective and consistent with National Policy.

Hence we object to the Plan for the following reasons:

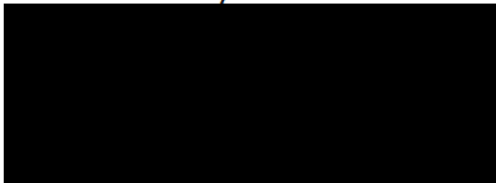
1. The Plan has been prepared on the basis that the East Midlands HS2 Station Hub will be constructed at Toton. This is clearly wrong and has implications across the plan in its entirety.
2. There are numerous references to land being within the Green Belt. It is not.
3. Policy ENV03 requires unacceptable and unjustified 80 metre wide green corridors. The objectives of the Plan can be achieved in much smaller corridors.
4. Wide unjustified corridors will stifle development and could prevent the provision of a northern access to the Chetwynd Barracks site.

We hope we will be afforded the opportunity to present our views to an Inspector.

Our client is a major stakeholder in the delivery of the Strategic Location for Growth at Toton and the delivery of a satisfactory access to Chetwynd Barracks and has been involved in the broader site since its inception. We are happy for further dialogue with the Forum and Borough Council if this will assist in moving this forward.

Should you require any further information then do not hesitate to contact me.

Yours faithfully



## Attachments

Appendix 1 – Representations Toton & Chilwell Neighbourhood Forum: Neighbourhood Plan 2019

Appendix 2 - Representations with regard to the Toton & Chetwynd Barracks Strategic Master Plan SPD. December 2021.

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 08 July 2022 16:03  
**To:** Policy  
**Subject:** RE: CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN  
REGULATION 16 CONSULTATION  
**Attachments:** Broxtowe 14.pdf

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ST Classification: OFFICIAL PERSONAL

Dear Sir / Madam

Thank you for giving Severn Trent an opportunity to comment on the Toton and Chilwell Neighbourhood Plan, We have no specific comment to make at this time, but have attached a copy of our standard response form with some common recommendations that we hope you may also find useful.

Kind Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

(Sat Nav postcode DE21 7BE)

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**Sent:** 10 June 2022 10:00

**To:** Growth Development <GrowthDevelopment@severntrent.co.uk>

**Subject:** CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION

Dear Sir or Madam,

## **CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION**

The Chetwynd: The Toton and Chilwell Neighbourhood Forum has submitted its Neighbourhood Development Plan ('Neighbourhood Plan') to Broxtowe Borough Council.

A Neighbourhood Plan is a community-led framework for guiding the future development and growth of an area. It may contain a vision, aims, planning policies, proposals for improving the area or providing new facilities, or allocation of key sites for specific kinds of development.

Broxtowe Borough Council is now inviting comments on this Plan.

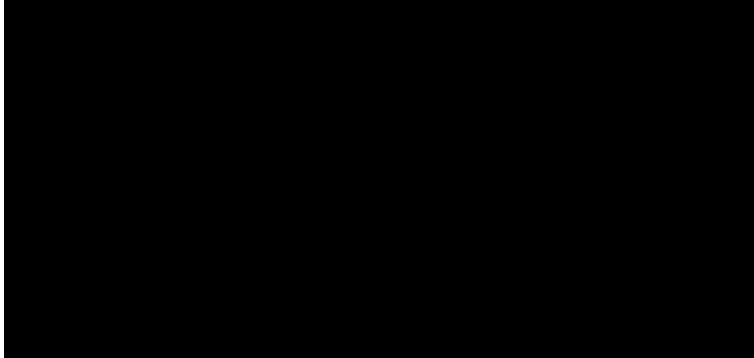


Details of where to view the documents, and how to respond, are set out in the Consultation Notice (further below) or on our website:

<http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan>.

The consultation period will run from **Wednesday 8<sup>th</sup> June 2022 to Friday 22<sup>nd</sup> July 2022**; all representations must be received within this time.

Yours faithfully



**TOWN AND COUNTRY PLANNING ACT 1990  
(AMENDED BY THE LOCALISM ACT 2011)  
NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS  
AMENDED)  
SUBMISSION OF THE NEIGHBOURHOOD DEVELOPMENT PLAN FOR THE  
CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD AREA (THE  
“CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN”):  
CONSULTATION UNDER REGULATION 16 OF THE NEIGHBOURHOOD  
PLANNING (GENERAL) REGULATIONS 2012 (AS AMENDED)**

Notice is given, that on 24<sup>th</sup> November 2021, a draft neighbourhood development plan (the “Chetwynd: The Toton and Chilwell Neighbourhood Plan”) was submitted to Broxtowe Borough Council, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

## **The 'plan proposal'**

In accordance with Regulation 16, Broxtowe Borough Council is now consulting upon the draft Chetwynd: The Toton and Chilwell Neighbourhood Plan. The following documents are available on our website at [www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan):

- Chetwynd: The Toton and Chilwell Neighbourhood Plan;
- Chetwynd: The Toton and Chilwell Neighbourhood Plan Policies Map;
- Map of the area covered by the Neighbourhood Plan;
- Notice of the Consultation;
- Consultation Statement;
- Basic Conditions Statement;
- Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report, Screening Opinions from Historic England and Natural England, and Final Conclusions;
- Strategic Environmental Assessment (SEA) produced by AECOM on behalf of the Neighbourhood Forum;
- Plan Modifications (April 2020); and,
- Supplementary Plan Modifications (October 2021)

## **Submitting Representations under Regulation 16**

If you would like to make comments on the Neighbourhood Plan proposals, please email your comments to Broxtowe Borough Council at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk). A response form is available on our website at: [www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan).

You can also post a copy of your comments to Broxtowe Borough Council at:  
Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation,  
Planning Policy Team,  
Broxtowe Borough Council,  
Council Offices,  
Foster Avenue,  
Beeston,  
Nottingham,  
NG9 1AB.

Paper copies of the form are also available at the locations listed below.

A paper copy of the Neighbourhood Plan and related documents is also available to view at the Reception of Broxtowe Borough Council's Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB (during normal opening hours). Copies of the response form are also available at the same location.

**The consultation will run from Wednesday 8<sup>th</sup> June until Friday 22<sup>nd</sup> July 2022. All responses must be received within this time.**

Any representations may include a request to be notified of the local planning authority's decision under regulation 19 in relation to the neighbourhood development plan. Therefore, please

confirm within any representations whether you would like to be notified when a decision is taken by the Borough Council on whether or not to 'make' the plan (i.e. if it is adopted as Council Policy under Regulation 19).

If you require any further information or assistance in relation to this public consultation or the Neighbourhood Plan document, please do not hesitate to contact the Planning Policy Team on **0115 917 3452 or 3015**. You can also email us at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

### **Data Protection**

Please note that the comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

## **A large print version of this notice is available on request.**

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**08 July 2022**

Our ref: Broxtowe 14

Dear Sir/Madam,

**Chetwynd – The Toton and Chilwell Neighbourhood Plan**

Thank you for the opportunity to comment on your consultation, we do not currently have any specific comments to make on your plan. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

**Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

**Wastewater Strategy**

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan will support future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling

to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

## Surface Water

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

### Drainage Hierarchy Policy

*New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.*

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.”

## Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

### Sustainable Drainage Systems (SuDS) Policy

*All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.*

*All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.*

*Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.*

Supporting Text:



Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

## **Blue Green Infrastructure**

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

### **Blue and Green Infrastructure Policy**

*Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.*

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:

“Planning policies and Decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”

### **Green Open Spaces Policy**

*Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.*

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

### **Water Quality and Resources**

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency's Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

#### **Protection of Water Resources Policy**

*New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology.*

*Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.*

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states:

"Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at

unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;”

### **Water Efficiency Policy**

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

*New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.*

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – [link](#).

We recommend that all new developments consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.



## Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

## Developer Enquiries

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage developers to contact us, details of how to submit a Developer Enquiry can be found here -

<https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/>

We hope that this information has been useful to you and we look forward to hearing from you in the near future.

Yours Sincerely,

[Redacted Signature]

[Redacted Name]

[Redacted Title]

**From:** [REDACTED]  
**Sent:** 14 July 2022 10:02  
**To:** Policy  
**Subject:** 20220714 Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation 16 Consultation

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED],

Thank you for consulting Sport England on the above.

### General

Our new Strategy 'Uniting The Movement' is a 10-year vision to transform lives and communities through sport and physical activity. We believe and will advocate sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all. We will be a catalyst for change and join forces on 5 issues which includes connecting communities, connecting with Health and Wellbeing and Active Environments.

The new strategy can be downloaded from our website [here](#) The strategy seeks to;

### Connect Communities

We want more communities to enjoy the benefits of what sport and physical activity can do, both for individuals and the place where they live and work. Those benefits will come from a more bottom-up approach, working with – not doing things to – communities, and helping those affected to play a role in what happens in their neighbourhood and how it gets done.

Active communities can be such a powerful tool in building great places to live.

### Connect with Health and Wellbeing.

We know that there are many organisations working to improve health and wellbeing, from the NHS to those in the voluntary and community sector, local authorities, employers and the commercial health and wellbeing sector.

The strategy creates a potential to improve existing connections and explore new areas to help strengthen people's health and wellbeing, from childhood right through to older age.

### Active Environments

Sport England considers that the planning system plays a vital role in shaping our built environment and that can play a big part in the movement of people and getting people active. Modern-day life can make us inactive, and about a third of adults in England don't do the recommended amount of weekly exercise, but the design of where we live and work can play a vital role in keeping us active.

We want to make the choice to be active easier and more appealing for everyone, whether that's how we choose to move around our local neighbourhood or a dedicated facility for a sport or activity.

As part of Sport England's drive to create an active environment, we promote Active Design through all planning activity. Active Design is Sport England's contribution to the wider debate on developing healthy communities. Active Design is rooted in Sport England's aims and objectives to promote the role of sport

and physical activity in creating healthy and sustainable communities. Active Design wraps together the planning and considerations that should be made when designing the places and spaces we live in. It's about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice. Sport England has produced design guidance on 'Active Design' that can be downloaded from the website [here](#).

#### Specific policies.

Sport England supports policy **LHC07**

However Sport England is concerned with Policy **LCH06** regarding a new Leisure centre for the area in the following area.

- Out of date evidence – The Broxtowe BC Built Sports Facilities Strategy dates from 2016 – as far as we are aware this report has not been kept up to date. No robust evidence is therefore available Para 98 NPPF 2021.
- The policy appears at odds with the Draft Toton and Chetwynd Barracks Strategic Masterplan SPD – whilst advising that a need for a leisure hub but states, 'Wider decisions about the future leisure strategy for Broxtowe are expected to be made in the near future'
- I understand that various reports have been tabled regarding the future of Bramcote Leisure centre. I note that as of Jan 2020 consultants had been appointed. Whilst researching on the potential redevelopment of Bramcote School, I stumbled on a report on google. I note that the reports states – *Internal Report not for publication* see **Meeting: 01/10/2020 - Policy and Performance Committee (Item 17)17 LEISURE FACILITIES STRATEGY**

<https://bramcotetest1.files.wordpress.com/2020/09/9.1appendix-1-broxtowe-leisure-centres-strategy-full-report-september-2020-continuum.pdf>

- I also understand that more detailed feasibility work is under way for the replacement of Bramcote Leisure centre. The above report does not promote Toton or Chetwynd Barracks as an appropriate site for leisure development. Which appears contrary to local plan policy 3.21 key development requirements. *Provide space for provision of a relocated Leisure hub with space for a Leisure Centre including indoor sports centre and 25m swimming pool and outdoor sports pitches*

Whilst it is 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 appears that there should be co-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.

[REDACTED]

[REDACTED]  
[REDACTED]

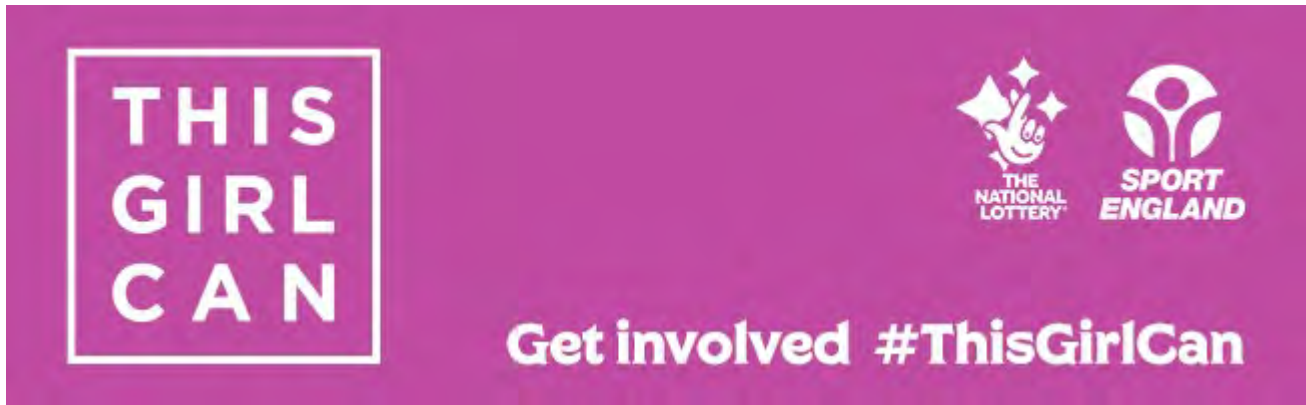
[REDACTED]

[REDACTED]

[REDACTED]







We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing [DPO@sportengland.org](mailto:DPO@sportengland.org)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 22 July 2022 09:27  
**To:** Policy  
**Subject:** CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN Reg 16  
**Attachments:** Consultation-Response-PPO-013-080-177.docx

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Policy Team

Following the policy consultation on 10 June 2022, please find attached our comments relating to the above policy.

If you would like to discuss any of the issues raised, please contact us.

Regards

Planning and Local Authority Liaison team

[REDACTED]  
[REDACTED]  
W: <https://www.gov.uk/coalauthority>

Making a better future for people and the environment in mining areas. Like us on <a href="https://www.facebook.com/thecoalauthority" title="Like us on Facebook">Facebook</a> or follow us on <a href="https://twitter.com/CoalAuthority" title="Follow us on Twitter">Twitter</a> and <a href="https://www.linkedin.com/company/the-coal-authority?trk=company\_name" title="Join us on LinkedIn">LinkedIn</a>.

<P>

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The Coal  
Authority



**FAO: Planning Policy Team  
Broxtowe Borough Council**

**BY EMAIL: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk)**

22<sup>nd</sup> July 2022

Dear Sir/Madam

**Re: Chetwynd: The Toton and Chilwell Neighbourhood Plan**

Thank you for your notification received on the 10th June 2022 in respect of the above Neighbourhood Plan consultation.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that there are no recorded coal mining features present at surface or shallow depth, which may pose a risk to surface stability or public safety, within the identified Neighbourhood Plan area. On this basis the Planning team at the Coal Authority have no specific comments to make on the Neighbourhood Plan.

Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully

[Redacted signature]

[Redacted contact information]



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 10 June 2022 11:56  
**To:** [REDACTED]  
**Subject:** Re: CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN  
REGULATION 16 CONSULTATION

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Hello [REDACTED],  
Thank you for the information.

1. Though there is reference to HS2 development at Toton, it does not seem to be updated to take into account recent announcements that HS2 stops at EM Parkway. Can you advise and/or direct me to this information?
2. Did I read it correctly that no changes are mooted for the Stapleford area?

Regards

[REDACTED]

---

**Sent:** 10 June 2022 09:58

**Subject:** CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION

Dear Sir or Madam,

## **CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION**

The Chetwynd: The Toton and Chilwell Neighbourhood Forum has submitted its Neighbourhood Development Plan ('Neighbourhood Plan') to Broxtowe Borough Council.

A Neighbourhood Plan is a community-led framework for guiding the future development and growth of an area. It may contain a vision, aims, planning policies, proposals for improving the area or providing new facilities, or allocation of key sites for specific kinds of development.

Broxtowe Borough Council is now inviting comments on this Plan.

Details of where to view the documents, and how to respond, are set out in the Consultation Notice (further below) or on our website:

<http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan>.

The consultation period will run from **Wednesday 8<sup>th</sup> June 2022 to Friday 22<sup>nd</sup> July 2022**; all representations must be received within this time.

Yours faithfully



**TOWN AND COUNTRY PLANNING ACT 1990  
(AMENDED BY THE LOCALISM ACT 2011)  
NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS  
AMENDED)  
SUBMISSION OF THE NEIGHBOURHOOD DEVELOPMENT PLAN FOR THE  
CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD AREA (THE  
“CHETWYND: THE TOTON AND CHILWELL NEIGHBOURHOOD PLAN”):  
CONSULTATION UNDER REGULATION 16 OF THE NEIGHBOURHOOD  
PLANNING (GENERAL) REGULATIONS 2012 (AS AMENDED)**

Notice is given, that on 24<sup>th</sup> November 2021, a draft neighbourhood development plan (the “Chetwynd: The Toton and Chilwell Neighbourhood Plan”) was submitted to Broxtowe Borough Council, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

**The ‘plan proposal’**

In accordance with Regulation 16, Broxtowe Borough Council is now consulting upon the draft Chetwynd: The Toton and Chilwell Neighbourhood Plan. The following documents are available on our website at [www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan):

- Chetwynd: The Toton and Chilwell Neighbourhood Plan;
- Chetwynd: The Toton and Chilwell Neighbourhood Plan Policies Map;
- Map of the area covered by the Neighbourhood Plan;



- Notice of the Consultation;
- Consultation Statement;
- Basic Conditions Statement;
- Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report, Screening Opinions from Historic England and Natural England, and Final Conclusions;
- Strategic Environmental Assessment (SEA) produced by AECOM on behalf of the Neighbourhood Forum;
- Plan Modifications (April 2020); and,
- Supplementary Plan Modifications (October 2021)

### **Submitting Representations under Regulation 16**

If you would like to make comments on the Neighbourhood Plan proposals, please email your comments to Broxtowe Borough Council at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk). A response form is available on our website at: [www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan).

You can also post a copy of your comments to Broxtowe Borough Council at:  
Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation,  
Planning Policy Team,  
Broxtowe Borough Council,  
Council Offices,  
Foster Avenue,  
Beeston,  
Nottingham,  
NG9 1AB.

Paper copies of the form are also available at the locations listed below.

A paper copy of the Neighbourhood Plan and related documents is also available to view at the Reception of Broxtowe Borough Council's Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB (during normal opening hours). Copies of the response form are also available at the same location.

**The consultation will run from Wednesday 8<sup>th</sup> June until Friday 22<sup>nd</sup> July 2022. All responses must be received within this time.**

Any representations may include a request to be notified of the local planning authority's decision under regulation 19 in relation to the neighbourhood development plan. Therefore, please confirm within any representations whether you would like to be notified when a decision is taken by the Borough Council on whether or not to 'make' the plan (i.e. if it is adopted as Council Policy under Regulation 19).

If you require any further information or assistance in relation to this public consultation or the Neighbourhood Plan document, please do not hesitate to contact the Planning Policy Team on **0115 917 3452 or 3015**. You can also email us at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

### **Data Protection**

Please note that the comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

## **A large print version of this notice is available on request.**

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 05 August 2022 17:10  
**To:** Policy  
**Subject:** Consultation on Toton/Chilwell Neighbourhood Plan  
**Attachments:** toton-chilwell-neighbourhood-plan-representations.pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[REDACTED]

Dear "Policy"

I "support with modifications" the Plan generally.

I've supplied some "representations" in the attached PDF file.

I apologise for not "completing a separate form for each representation". Since today is the deadline, I'm afraid that I won't have time to re-organise my comments into that format.

Yours sincerely

[REDACTED]



*Making cycling a viable option for accessing*

*Toton Area Development from within a 5-mile radius*

[REDACTED]

[REDACTED]

August 2021

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### **Note**

In the figures, primary routes are shown in pink, and secondary routes are shown in blue.

## Acknowledgement

The figures are based on OS Landranger © Crown Copyright.

## §1 Introduction

In *East Midlands HS2 Growth Strategy* (1), the East Midlands Councils envisage considerable growth, within the East Midlands HS2 Hub Growth Zone, during the next 25-or-so years. In particular, it's anticipated that the Toton & Chetwynd Developments will create 10,000 new jobs, and deliver 4,500 new homes. Further homes are likely to be built on the adjacent "Wheatgrass Farm" land.

In *Access to Toton, the HS2 East Midlands Hub* (2), Midlands Connect propose road/train/tram/bus infrastructure to link the main destinations and population-centres in the Growth Zone. Midlands Connect envisage this travel infrastructure being delivered in three phases, spread over 25 years.

Although *Access to Toton, the HS2 East Midlands Hub* mentions cycling & walking, it doesn't make any specific proposals about the infrastructure that will be needed. The present document aims to fill that vacuum for the area around the Toton, Wheatgrass & Chetwynd Developments.

Like Broxtowe Borough Council and Nottinghamshire County Council (3 p. 10), I think that "cycling should be made a viable option for accessing the hub from within a 5-mile radius". So I've considered what infrastructure will be required to support cycling between places that are within roughly 5 miles of the centre of the Toton Area Development, and to support walking within roughly 2 miles. Like the infrastructure for road/train/tram/bus, the cycling/walking infrastructure could be delivered over the next 25-or-so years.

The red shading in Figure 1 shows the area that's within a 5-mile radius.



Figure 1 – Area within 5-mile radius of centre of Toton Area Development



## §2 Working assumptions about wide-area network

*East Midlands HS2 Growth Strategy* (1) mentions various destinations and population-centres, within the Growth Zone, that have wide-area importance. I anticipate that the authorities will want to connect these places by cycle-routes. I've drafted some proposals for a suitable network (4): the routes relevant to travel with 5 miles of Toton are shown in Figures 2 & 3. These routes are broadly north-south or west-east.<sup>A</sup>

The present document makes the “working assumptions” that:

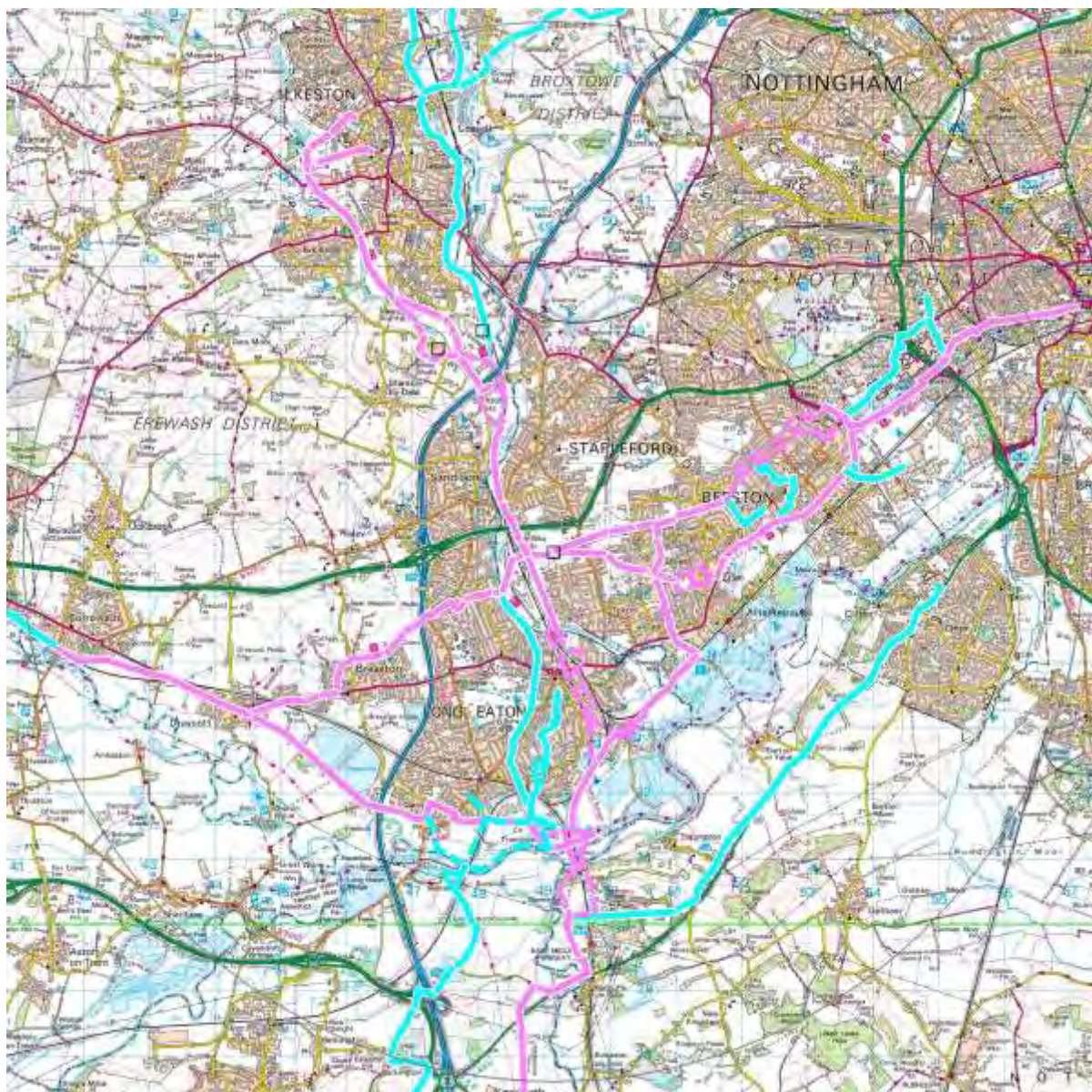
- the wide-area cycle-routes that the authorities deliver will be as shown in Figures 2 & 3
- so the cycle-routes shown in Figures 2 & 3 will be available for local-area trips.

---

<sup>A</sup> The north-south routes assume that (a) because the Erewash Canal towpath between Stanton and Cranfleet Farm is already “at capacity”, additional routes are required (b) because the Toton and Ratcliffe redevelopments (and E M Airport & E M Gateway Logistics Park) will all generate cycle-trips, a cycle-link is needed between them.



Figure 2 – Working assumptions about wide-area routes within 5-mile radius



This map shows the following routes, taken from (4).

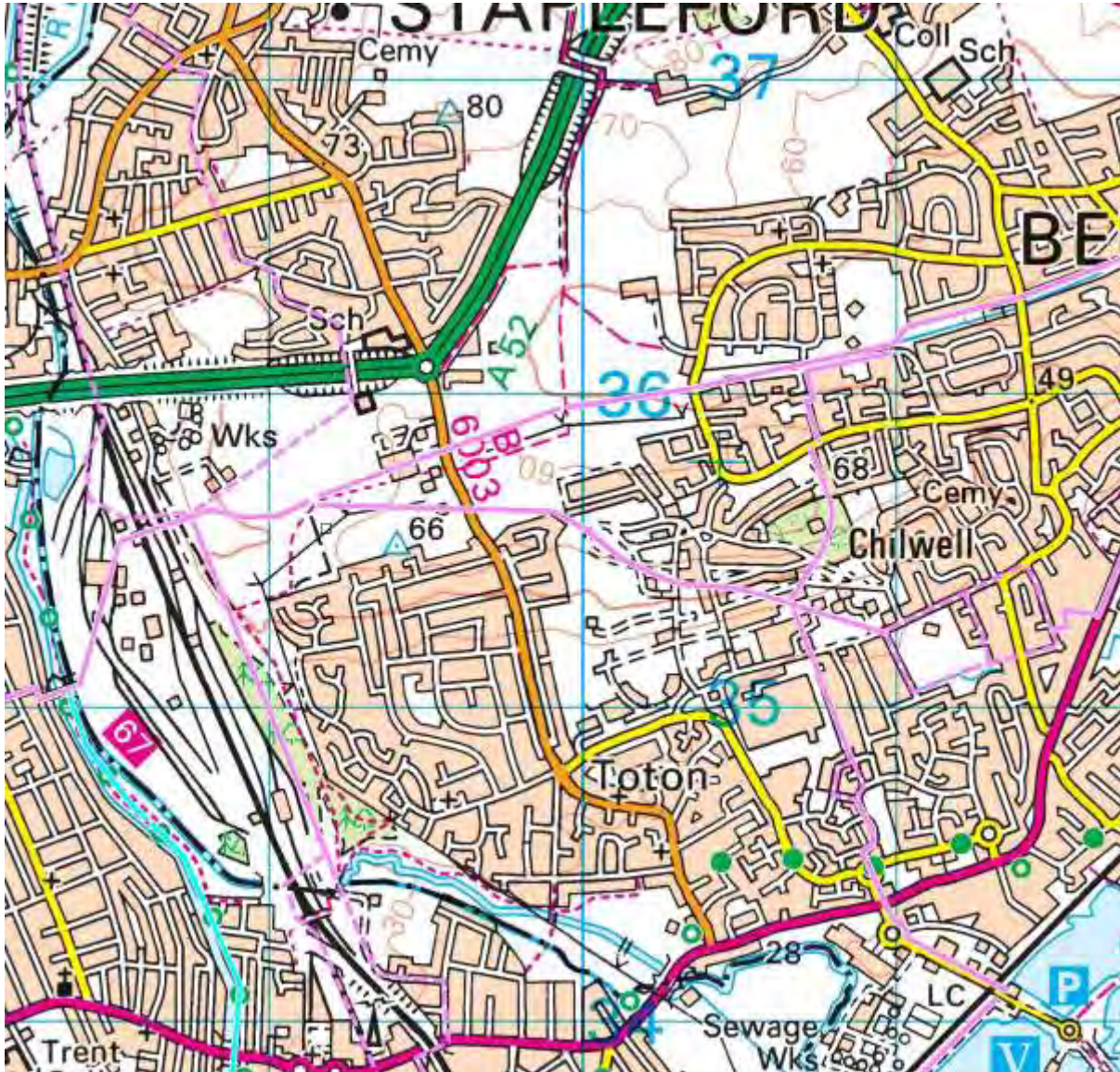
- #A01 Ilkeston – Stanton Development – Toton Area Development (for #A02 and #A03) – Ratcliffe Development – East Midlands Airport
- #A02 Derby – Draycott (for #A04) – Beeston – Toton Area Development (for #A01) – Beeston (north) – University Park – Nottingham
- #A03 Toton Area Development – Chetwynd Development – Beeston (south) – University Park (for #A02)
- #A04 Draycott (for #A02) – Sawley – Cranfleet Farm (for #A01)
- #A05 Chilwell (for #A02) – Chetwynd Neighbourhood Centre – Chilwell Retail Park – Cranfleet Farm (for #A01)
- #B01 Stanton Lock (Erewash Canal) – Langley Mill
- #B02 Erewash Canal (A6096 bridge) – Kimberley
- #B03 Erewash Canal (A6096 bridge) – IKEA
- #B04 Erewash Canal (Shipleigh Gate) – Eastwood
- #B05 Toton North/South CAs – Long Eaton town centre – Trent Lock – Cranfleet Farm<sup>B</sup>
- #B06 Redhill Marina – Ratcliffe Development – Clifton
- #B11 Cator Lane – Beeston (west)
- #B12 Bramcote Avenue / Cumberland Avenue junction – Beeston town centre
- #B13 University Park west entrance – University Park campus – QMC main entrance – Jubilee Campus
- #B14 QMC / Medical School south entrance – Jubilee Campus
- #B15 A6005 / Vincent Avenue junction – Beeston town centre
- #B16 A6005 / Beacon Road junction – Nottingham Enterprise Zone (Boots site)
- #B17 Long Eaton / Sawley – E M Gateway/Freeport

<sup>B</sup> I'm using CA as an abbreviation for "character area". See (6).



Figure 3 – Working assumptions about wide-area routes passing through Toton, Wheatgrass & Chetwynd Developments

Figure 3 is a magnified view of part of Figure 2.



This map shows parts of the following routes, taken from (4).

- |      |   |
|------|---|
| #A01 | Ilkeston – Stanton Development – Toton Area Development (for #A02 and #A03) – Ratcliffe Development – East Midlands Airport |
| #A02 | Derby – Draycott (for #A04) – Breaston – Toton Area Development (for #A01) – Beeston (north) – University Park – Nottingham |
| #A03 | Toton Area Development – Chetwynd Development – Beeston (south) – University Park (for #A02)                                |
| #A05 | Chilwell (for #A02) – Chetwynd Neighbourhood Centre – Chilwell Retail Park – Cranfleet Farm (for #A01)                      |
| #B05 | Toton North/South CAs – Long Eaton town centre – Trent Lock – Cranfleet Farm  |

### §3 Local-area network

In addition to the destinations and population-centres with wide-area importance, there are many places that have local importance.

- Employees who have the “10,000 new jobs” will need to commute between home and work.
- Residents who occupy the “4,500 new homes” will need to travel to schools, work-places, shops & leisure-centres.

The present document focuses on the local-area infrastructure that these future employees and residents will need – in addition to the wide-area infrastructure shown in Figures 2 & 3 – to enable them to travel between places that are of local importance.

The wide-area routes shown in Figures 2 & 3 will cater for local trips that are broadly north-south or west-east. The following sections define additional routes to cater for local trips that are broadly SW-NE or NW-SE.

### §4 Suggested local-area routes: broadly SW-NE

People will need to make trips that are broadly SW-NE for reasons that include the following.

- Travel between work-places in Toton Area Development and homes in Long Eaton, Wheatgrass Development, Stapleford, Bramcote, Bramcote Hills & Wollaton.
- Travel between work-places in Long Eaton and homes in Toton Area, Wheatgrass & Chetwynd Developments.
- Travel between homes in Toton Area, Wheatgrass & Chetwynd Developments and:
  - Wilsthorpe School, Trent College, George Spencer Academy,<sup>c</sup> Alderman White School, Bramcote College
  - Toton Tesco Extra, Long Eaton town-centre
  - West Park Leisure Centre, Bramcote Leisure Centre.

To enable people to cycle/walk between these locally important places, I suggest the routes shown in Figure 4.

---

<sup>c</sup> I’m assuming that George Spencer Academy will be moved into the Toton East “character area”. (6)



Figure 4 – Suggested local-area routes: broadly SW-NE



This map shows the following routes:

- #C01 Long Eaton (Station Street) – Toton (west) – Toton (north) – Toton East CA (for George Spencer Academy) – Wheatgrass Development – Stapleford (east) – Bramcote Leisure Centre – Bramcote College – Bramcote Hills – Wollaton
- #C02 Wheatgrass Development – Alderman White School – Bramcote
- #C03 West Park Leisure Centre – Trent College / Wilsthorpe School – Long Eaton (Midland Street) – Toton (west) – Toton Tesco Extra – Chetwynd Development
- #C04 West Park Leisure Centre – Trent College / Wilsthorpe School – Toton North/South CAs – Toton East CA (for George Spencer Academy)

For further details, see (4).



## §5 Suggested local-area routes: broadly NW-SE

People will need to make trips that are broadly NW-SE for reasons that include the following.

- Travel between work-places in Toton Area Development and homes in Sandiacre, Stapleford & Attenborough.
- Travel between homes in Sandiacre, Stapleford, Toton, Wheatgrass & Chetwynd Developments and:
  - Friesland School, George Spencer Academy, Chilwell School
  - Stapleford town-centre, Toton Tesco Extra, Chilwell Retail Park
  - Friesland Sports Centre, Attenborough Nature Reserve, Chilwell Olympia
  - Toton HS2/classic station, Attenborough station.

To enable people to cycle/walk between these locally important places, I suggest the routes shown in Figure 5.

Figure 5 – Suggested local-area routes: broadly NW-SE



This map shows the following routes:

- #C05 Sandiacre town centre / Friesland School – Toton North/South CAs – Toton (north) – Toton Tesco Extra – Chetwynd Development main entrance – Chilwell Retail Park – Attenborough Nature Reserve
- #C06 Stapleford town centre – Toton North CA – Toton East CA (for George Spencer Academy) – Chetwynd Neighbourhood Centre – Chilwell School/Olympia
- #C07 EM Hub Station – Chetwynd Neighbourhood Centre – Attenborough Station

For further details, see (4).

## §6 Suggested B6003 mitigations

From the point-of-view of pedestrians, the Stapleford Lane section of the B6003 is generally acceptable, with appropriate footways.

For cyclists, Stapleford Lane is problematic, because the carriageway is relatively narrow, and is used by heavy traffic. Because of these difficulties, the routes suggested earlier avoid the B6003 as much as possible.

Unfortunately, it isn't possible to design an adequate local-area cycle-route network that avoids the B6003 entirely. In particular, it seems impossible to circumvent the section near Cleve Avenue and Katherine Drive.

As shown in Figure 6, mitigations are desirable throughout the section of the B6003 between Toton Area Development and Banks Road / Swiney Way. For specific suggestions, see (4).

Mitigations are particularly desirable:

- near Katherine Drive, where the current footway is too narrow for “shared use”
- northbound, near Cleve Avenue, where the carriageway is very steep, and there's no “service road”
- southbound, near the junction with Banks Road / Swiney Way, because there's no “service road”.

Figure 6 – Places where mitigations are desirable on B6003





## §7 Combination of wide-area routes with local-area routes

The combination of local sections of the wide-area routes (the “working assumptions” in §2) and local-area routes (suggested in §4 and §5) will give the comprehensive network shown in Figures 7 & 8.

This network will make “cycling ... a viable option for accessing the hub from within a 5-mile radius”.  
(3 p. 10)

Figure 7 – Wide-area routes within 5-mile radius, plus local-area routes

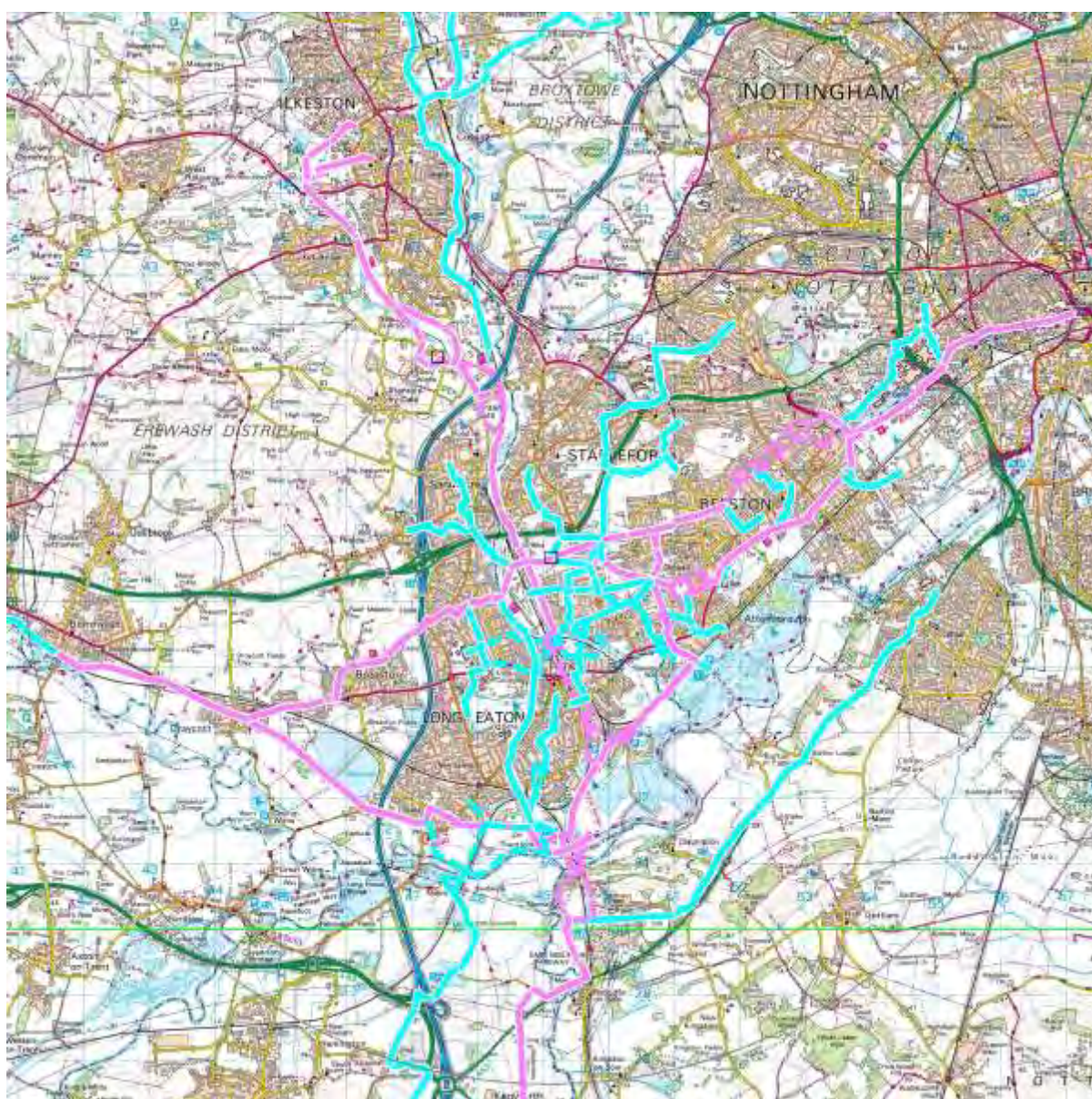
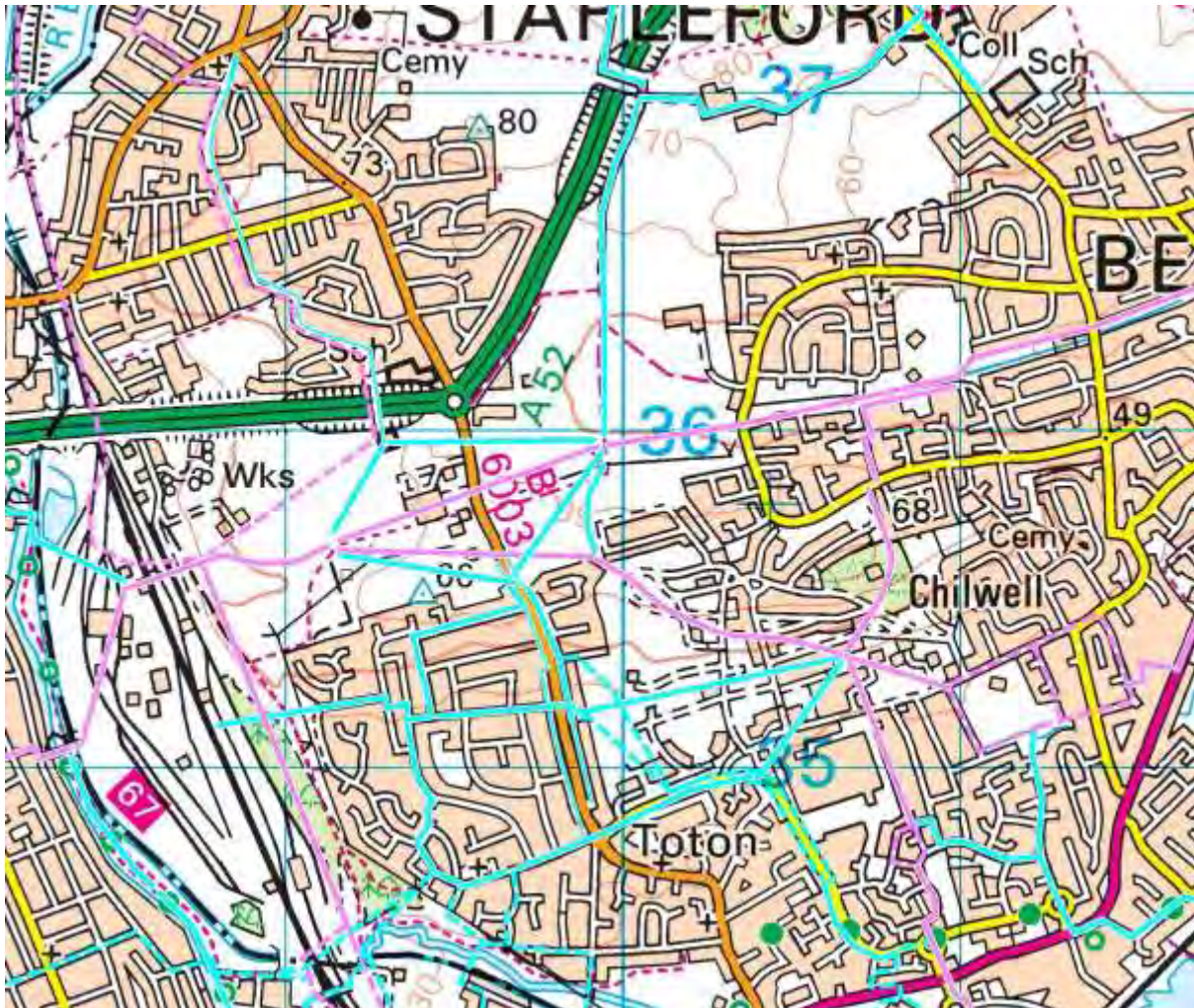




Figure 8 – Wide-area routes, plus local-area routes, passing through Toton, Wheatgrass & Chetwynd Developments

*Figure 8 is a magnified view of part of Figure 7.*



## §8 Recreational trips

The network suggested in previous sections will enable future residents to make utility trips – e.g. between home and school, work-place or shops – by bicycle or on foot.

As a bonus, the network will also facilitate various recreational trips. For example:

- For a circular cycle-ride round “the Toton horseshoe” and Attenborough Nature Reserve, use sections of #A01, #A02, #A03 & #A05.
- For a cycle-ride to Dale Abbey, starting in Sandiacre, use #C05.
- For a circular cycle-ride round Attenborough Nature Reserve, use #C05 & #C07.
- To cycle/walk in the Derwent valley, use #C07 to Attenborough Station, and catch a Matlock train.

Further opportunities for recreational trips will be provided by any additional cycleways that may be provided within the “green corridors” envisaged in the *Neighbourhood Plan* (5), or within the “open space network” envisaged in the *Virtual Exhibition* (6).

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*Transforming Cities Fund – A6005 Cycle Corridor*

Comments on proposals for cycle-route between  
Lower Road and Ranson Road

[REDACTED]

[REDACTED]

May 2022

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## Abbreviations & terminology

CIL	Community Infrastructure Levy
TCF	Transforming Cities Fund
the (TCF) Scheme	the proposed TCF-funded route between Lower Road and Ranson Road
bronze-quality	relatively inexpensive, but not very satisfactory
silver-quality	moderately priced, moderately satisfactory
gold-quality	satisfactory, but expensive

## §1 Future-proofing the Scheme in relation to the Toton/Chetwynd Development

### §1.1 Background

The huge Toton/Chetwynd re-development site consists of:

- brown-field land at the derelict Toton marshalling yards
- some green-field land straddling Stapleford Lane
- brown-field land at the soon-to-be-closed Chetwynd Barracks.

The site's boundaries are shown in Figure 1.

The Toton/Chetwynd Development will provide thousands of jobs, and deliver thousands of homes. It comes under the purview of the East Midlands Development Company. (1)

Broxtowe Borough Council's *Toton & Chetwynd Barracks Strategic Masterplan* aspires for the site to have "unparalleled connectivity through new ... cycling links". (2 p. 35) And the Borough Council's *Part 2 Local Plan* says that "cycling should be made a viable option for accessing the hub from within a 5-mile radius". (3 p. 35)

So a good-quality cycle-route network needs creating for the area within a 5-mile radius around the Development, to enable:

- people who work in the Development to cycle-commute from homes outside the Development
- people who live in the Development to cycle to destinations outside the Development (for work, school, shopping, etc).

Regarding cycle-routes heading east from the Development (towards Beeston & Nottingham), the High Road / Chilwell Road alignment is problematic because of its relative narrowness, numerous parked vehicles, and frequent bus traffic. In particular, because on-street tramlines are hazardous for cyclists, it will be unacceptable for any cycle-route to incorporate the section of Chilwell Road between Beeston College and Devonshire Avenue. (4) (5)

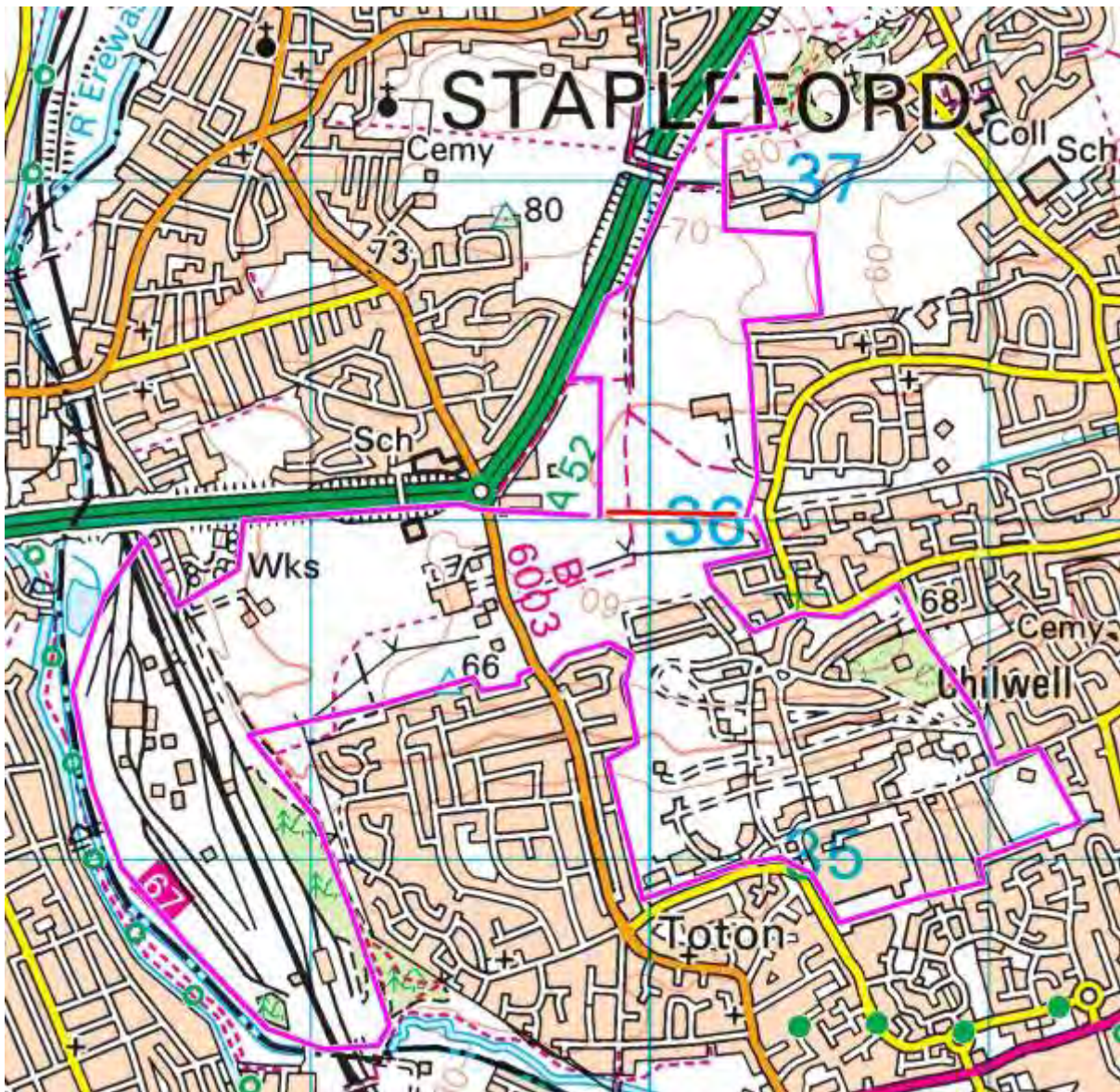
So the safe alignments for cycle-routes heading east from the Development are broadly:

1. starting from the proposed Toton Innovation Campus, proceed parallel to the tramlines to Cator Lane, and then skirt north of Beeston town-centre to serve destinations such as the town-centre, University of Nottingham and QMC.
2. starting from Chetwynd, skirt south of the town-centre to serve destinations such as Chilwell School/Olympia, Beeston town-centre, Beeston station, Royal Mail Delivery Office, Boots Enterprise Park, Beeston Rylands, University of Nottingham and QMC.

**A segment of the proposed TCF Scheme will be potentially extremely useful as a component of (2).**



Figure 1 – Boundaries of Toton/Chetwynd site



#### Notes

The land whose boundary is shown in pink is all earmarked for development.

- Most of it – south of the red line – is within the scope of the *Toton & Chetwynd Barracks Strategic Masterplan*. (2)
- The remainder – north of the red line – is controlled by Bloor Homes. (6)



## §1.2 Connecting to the Development

To be useful, a cycle-route must be fairly direct.

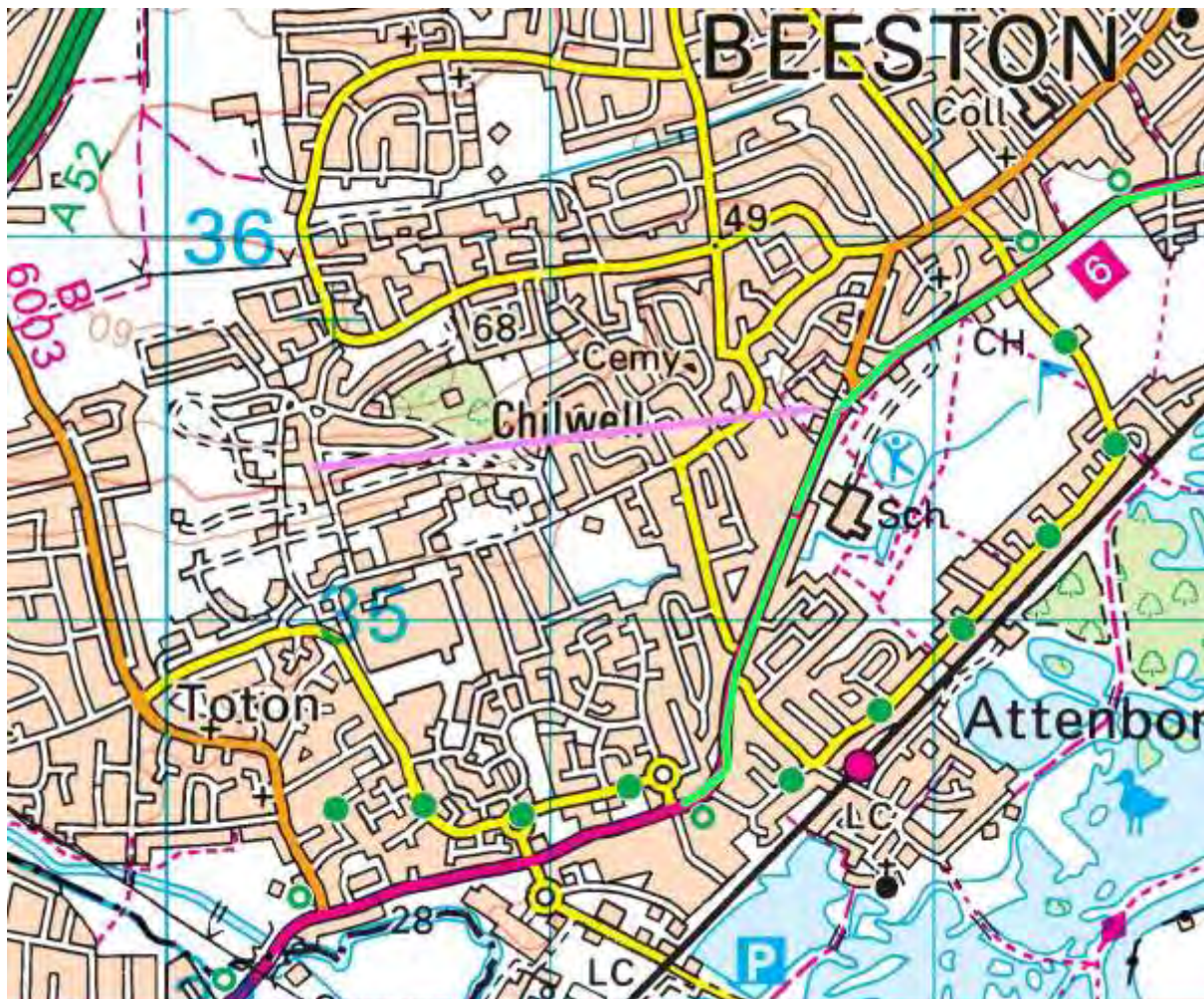
From the point-of-view of a westbound cyclist:

- Section 2 of the Scheme heads towards the Chetwynd Development
- Section 3 does not head towards the Development.

So, for people who want to cycle between Nottingham/Beeston and the Development, the optimal point for a direct-line alignment from the Development to meet the Scheme would be near the westmost end of Section 2 of the Scheme, as shown in Figure 2.

Due to pre-existing buildings, it won't actually be possible to construct a cycle-route along that direct line. Nevertheless, Figure 2 will be useful as a benchmark of direct-ness against which to compare more practical alignments.

*Figure 2 – Direct line between Section 2 of Scheme and centre of Chetwynd Development*



### Key

Scheme is shown in green. "Direct line" is shown in pink.



Figure 3 shows three potential practical alignments for a cycle-route, to link the centre of the Chetwynd Development with the Scheme, for use by people who want to cycle between Nottingham/Beeston and the Development. Further details are provided in Tables 1 & 2.

*Figure 3 – Alignments for a cycle-route between Scheme and centre of Chetwynd Development*

## Key

Plausible alignments for cycle-route between Scheme and centre of Chetwynd Development are shown in pink, dark blue and light blue.



Table 1 – Details of alignments shown in Figure 3

Colour in Figure 3	Alignment (if cycling east to west)	Pros	Cons
Pink	<p>EITHER between A6005/B6464 junction and Perkins Way, convert A6005's northern footway/verge to good-quality cycleway/footway</p> <p>OR use Scheme until opposite Perkins Way, then have traffic-lights to enable pedestrians/cyclists to cross between Scheme and Perkins Way.</p> <p>Perkins Way.</p> <p>Jitty.</p> <p>Sean Upton Close.</p> <p><b>Clockwise</b> round Charles Avenue to Attenborough Lane.</p> <p>Traffic-lights to enable pedestrians/cyclists to cross Attenborough Lane.</p> <p>EITHER (gold quality) purchase either 46 or (preferably) 48 Attenborough Lane, demolish it, use its plot to provide wide footway/cycleway into recreation ground</p> <p>OR (silver quality) buy strip of land from 46 Attenborough Lane so jitty can be widened to edge-of-bungalow</p> <p>OR (bronze quality) increase effective width of jitty by (a) negotiating with 46 Attenborough Lane for hedge to be replaced by fence (b) removing shin-threatening posts between jitty and nursery</p> <p>OR (sub-bronze quality) just remove posts between jitty and nursery.</p> <p>EITHER through recreation ground, to enter Chetwynd Development near south-east corner of sports-ground</p> <p>AND/OR through recreation ground, to Thompson Close, to enter Chetwynd Development via proposed bus-gate on Chetwynd Road.</p> <p>Alternatively, <b>anticlockwise</b> round Charles Avenue then High Road &amp; Chetwynd Road.</p> <p><i>Status quo</i> quality is sub-bronze, because both eastbound and westbound cyclists would have a nasty right turn. Perhaps highway engineers may be able to re-configure High Road between Charles Avenue and Chetwynd Road (traffic lights? two mini-roundabouts? red asphalt to show trajectory to be taken by cyclists?) to rectify the nastiness, in which case "anticlockwise" might become silver-quality.</p>	<p>Of the 3 alignments shown in Figure 3, this one is closest to the direct alignment shown in Figure 2.</p> <p>It will not only be suitable as a cycle-route, but will also be suitable as a route for children living in the Chetwynd Development walking to Chilwell School.</p>	<p>Unless land is purchased from either 46 or 48 Attenborough Lane, the jitty between Attenborough Lane and the recreation ground might have to be one of the "rare cases" where it's acceptable to break the principles in <i>Cycle infrastructure design</i> and allow "a short stretch of less good provision rather than jettison an entire route which is otherwise good". (7 p. 13)</p>
Dark blue	<p>Between A6005/B6464 junction and Attenborough Lane, use Scheme.</p> <p>Convert footway/verge on east side of Attenborough Lane to good-quality footway/cycleway as far as Charles Avenue.</p> <p>Then into Chetwynd Development via jitty and recreation ground, the gold/silver/bronze options being the same as for the alignment shown in pink on Figure 3.</p>		<p>Relative to "pink":</p> <ul style="list-style-type: none"> <li>• May cause cyclists more anxiety, because route will cross numerous A6005 driveways.</li> <li>• Crossing A6005 may be more difficult at Attenborough Lane than as in "pink".</li> <li>• Lamp-posts on Attenborough Lane will be troublesome (either because highway engineers need to move them, or because cyclists need to negotiate them).</li> </ul>
Light blue	<p>Use Scheme between A6005/B6464 junction and Ranson Road.</p> <p>EITHER</p> <p>Newall Drive, into recreation ground, to enter Chetwynd Development near south-east corner of sports-ground</p> <p>AND/OR</p> <p>Newall Drive, Mountbatten Way, to enter Chetwynd Development between 54 and 56 Mountbatten Way.</p>	<p>Circumvents the problem – which arises with "pink" and "dark blue" – of how to provide something that's better than the current jitty between Attenborough Lane and the recreation ground.</p>	<p>Of the 3 alignments shown in Figure 3, "light blue" is farthest from the direct alignment shown in Figure 2.</p> <ul style="list-style-type: none"> <li>• Even for destinations in the southern part of the Chetwynd Development, cycling via Ranson Road would be unreasonably circuitous.</li> <li>• For destinations in the northern part of the Chetwynd Development, cycling via Ranson Road would be prohibitively circuitous. Rather than using the Scheme via Ranson Road, people may in practice opt to cycle along the hazardous High Road / Chilwell Road route (and the Development's cycling links will have fallen well short of the "unparalleled connectivity through new ... cycling links" envisaged in the <i>Strategic Masterplan</i> (2 p. 35) ).</li> </ul>

*Table 2 – Implications of Figure 3 alignments for VIA East Midlands / Nottinghamshire County Council and for Broxtowe Borough Council*

**Note**

The table assumes the standard two-tier division of roles between the two authorities.  
If this assumption is invalid – e.g. because EMDevCo is involved – amend accordingly.

<b>Colour in Figure 3</b>	<b>VIA East Midlands / Nottinghamshire County Council</b>	<b>Broxtowe Borough Council</b>
All	<p>As well as doing definitive design for the Scheme, do provisional design for one-or-more cycle-routes between the Scheme and the boundary of the Toton/Chetwynd Development, so VIA/Notts CC can:</p> <ul style="list-style-type: none"> <li>• tell Broxtowe BC how much Broxtowe BC will need to levy from Toton/Chetwynd developers via Section 106 / CIL.</li> <li>• prepare “contingency plans” for the junction(s) between: <ul style="list-style-type: none"> <li>○ the Scheme, and</li> <li>○ the cycle-route(s) between the Scheme and the Development.</li> </ul> </li> </ul> <p>Discuss – with Broxtowe BC – where cycle-routes will cross the boundaries of the Development.</p>	<p>Discuss – with VIA / Notts CC / Derbys CC – where cycle-routes will cross the boundaries of the Development.</p> <p>Ensure that:</p> <ol style="list-style-type: none"> <li>1. the <i>Strategic Masterplan</i> reserves the corridors that the cycle-routes will need within the boundaries of the Development</li> <li>2. developers will contribute (via Section 106 /CIL) to the cost of the cycle-route(s) – outside the boundaries of the Development – that will link the Development to the Scheme.</li> </ol> <p>Set up a process for apportioning the cost of the external infrastructure needed to underpin the Development – of which (2) is just one example – between developers. Input cost-estimates for cycle-routes– received from VIA / Notts CC – into the cost-sharing process.</p>
Pink	<p>Decide whether it’s better to ...</p> <ul style="list-style-type: none"> <li>• between A6005/B6464 junction and Perkins Way, convert A6005’s northern footway/verge to good-quality cycleway/footway</li> <li>... or to ...</li> <li>• use Scheme until opposite Perkins Way, then have traffic-lights to enable pedestrians/cyclists to cross between Scheme and Perkins Way.</li> </ul> <p>Set up Rightmove alert, in case 46 or 48 Attenborough Lane are offered for sale.</p> <p>Provide Broxtowe BC with estimates of the likely cost of delivering the route at gold/silver/bronze quality.</p>	
Dark blue	<p>Decide how to enable cyclists to cross from the Scheme on the south of the A6005 to the cycleway on the east side of Attenborough Lane.</p> <p>As with the “pink” alignment:</p> <ul style="list-style-type: none"> <li>• set up Rightmove alert, in case 46 or 48 Attenborough Lane are offered for sale</li> <li>• provide Broxtowe BC with estimates of the likely cost of delivering the route at gold/silver/bronze quality</li> </ul>	
Light blue	<p>In cost-estimates, include cost of replacing barrier at north end of Newall Drive by something more cycle-friendly</p>	<p>As a particular case of ensuring that the <i>Strategic Masterplan</i> reserves all the corridors that cycle-routes will need, take care to reserve a corridor northbound from between 54 and 56 Mountbatten Way.</p>

### §1.3 Nottingham-Derby route via the Development

If you like, the perspective taken by §1.2 (above) is that the prospective build-out of the Toton/Chetwynd Development is a forthcoming problem, for which the Scheme's project-team should prepare "contingency plans".

There is another perspective. The Toton/Chetwynd Development can be regarded as "a potential solution" rather than as "a forthcoming problem".

- The Scheme is part of TCF-funded programme which aims to provide a continuous high-quality wide-area cycle-route between Nottingham and Derby. (8)
- The programme-managers may have difficulty identifying a suitable alignment through Long Eaton to link the Scheme onto a TCF-funded "Breaston to Derby" segment.
  - The alignment used by NCN 6 between Ranson Road and Breaston is convoluted, with variable quality. Unfortunately, it's difficult to see how this segment can be made significantly more direct, and of significantly better quality.
  - It's also difficult to see how a high-quality cycle-route can be retro-fitted, immediately adjacent to the A6005, through Long Eaton.
- By contrast, the Toton/Chetwynd Development is almost "a blank canvas", consisting of green-field land and brown-field land. And the authorities aspire for the Toton/Chetwynd Development to have "unparalleled connectivity through new ... cycling links". (2 p. 35)

**Why not aim to provide the continuous high-quality cycle-route between Nottingham and Derby by linking the Scheme to the TCF-funded "Breaston to Derby" segment via a high-quality cycleway through the Toton/Chetwynd Development?**

Figure 4 shows an indicative alignment. From the point-of-view of someone cycling in the Nottingham-Derby direction:

- Use Scheme's high-quality route as far as Chilwell.
- Into Toton/Chetwynd Development as for §1.2's "pink" route.
- High-quality cycleway through Toton/Chetwynd Development via an alignment chosen to keep the gradients cycleable (i.e. an alignment that's at an angle to the contours, rather than perpendicular to them).
- Across the railway via a foot/cycle bridge – which might be shared with a busway – to near Dockholm Lock.
- Quiet roads to Breaston (e.g. Willoughby Avenue, Ravensdale Avenue, Rydal Avenue, jitty, Grasmere Road, Longmoor Road Service Road, Longmoor Lane, Steven's Lane).
- From Breaston, use TCF-funded Breaston-Derby segment.

Details of the options for connecting to the Scheme will be the same as in Tables 1 & 2 in §1.2.

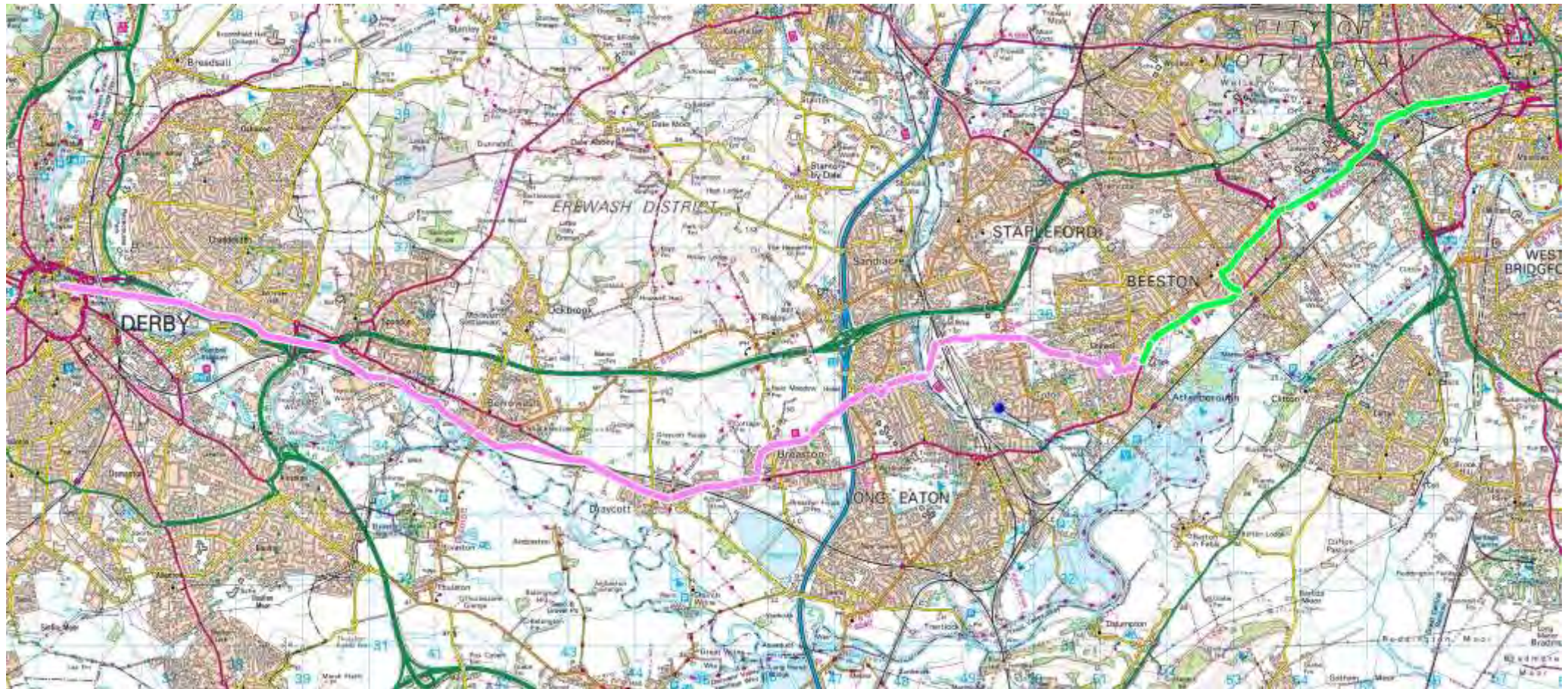
#### **Note**

Even if the TCF-funded programme does opt to provide the continuous cycle-route between Nottingham and Derby via the Toton/Chetwynd Development, using either the "pink" or "dark blue" alignment, the "Chilwell to Ranson Road" section of the Scheme will still be worthwhile.

- It will be more direct than the existing NCN 6 through Attenborough.
- The quality of the existing NCN 6 may be adequate for use as a local-area route between Ranson Road and Long Eaton town-centre.
- Similarly, the quality of the existing NCN 6 seems adequate for use as a local-area route between Breaston and Long Eaton town-centre.



Figure 4 – Creating a Nottingham-Derby cycle-route by combining Scheme with cycleway through Toton/Chetwynd Development



#### Key

Green Nottingham's Western Cycle Corridor, and segment of Scheme

Pink Cycle-route through Toton/Chetwynd Development, and TCF-funded Breaston-Derby segment  
*Note how the alignment through the steep part of the Chetwynd area is curved, to keep gradients cycleable.*

## §2 Taking opportunity to enable cyclists to by-pass Chilwell Road's tramlines

Tramlines are life-threatening for cyclists. (4) (5) For the majority of the NET tramline network, NET provided good-quality alternative parallel cycle-routes. Unfortunately, when embedding the tramline in Chilwell Road, between Beeston College and Beeston town-centre, NET failed to provide cyclists with a good-quality alternative route. Chilwell Road is notorious among local cyclists.

The Chilwell Road situation poses difficulties for redevelopment of both the Barton Quarter site and the Beeston College site. Both developers are pitching their proposals as being likely to generate more "sustainable modes" traffic than comparable developments elsewhere, and correspondingly less private car traffic. (9) (10 pp. 34-46)

If cycling between those sites and Beeston town-centre remains hazardous:

- at the planning stage, the developers' "sustainable modes" cases will be undermined
- if construction proceeds, residents who cycle will be at risk from the tramlines.

The two developments will strengthen the Scheme's "business case". **The Scheme will provide opportunities for "cyclist by-passes" to be provided, as part of the infrastructure needed to underpin the Barton Quarter and Beeston College developments.** Figure 5 shows potential alignments, and Tables 3 & 4 provide further details.

**The Scheme's project-team should prepare tangible "contingency plans" for junctions between the Scheme and potential cycle-routes to serve the Barton Quarter and Beeston College developments.**



Figure 5 – Alignments for cycle-routes between Scheme and Barton Quarter & Beeston College developments



#### Key

Green	Nottingham's Western Cycle Corridor, and segment of Scheme
Light blue	Cycle-route to/from Beeston College development that (with Scheme) circumvents most of Chilwell Road tramlines
Dark blue	Cycle-route to/from Beeston College development that (with Scheme) circumvents all of Chilwell Road tramlines
Pink	Cycle-route between Scheme and Barton Quarter.



Table 3 – Details of alignments shown in Figure 5

Colour in Figure 5	Alignment (if cycling east to west)	Pros	Cons
TO SERVE BEESTON COLLEGE DEVELOPMENT			
Light blue	Junction with Scheme at West End. West End. Barrydale Avenue. Lacemaker Road. Wilmot Lane (where south end of footway will need a dropped kerb). B6464 (on cycleways, where provided).	Will enable cyclist-residents of Beeston College development to by-pass <b>most</b> of the tramlines.	Won't enable cyclist-residents of Beeston College development to by-pass <b>all</b> of the tramlines.  Wilmot Lane footway doesn't look amenable to being widened (though it's so short that conflict with pedestrians is likely to be rare).
Dark blue	Junction with Scheme opposite Barton Way. Barton Way. Bridge Avenue. Toucan to cross High Road. Re-purposed footway on north side of High Road.  Design might include traffic-lights at A6005/Barton Way junction where southbound "straight ahead" is for cyclists only (to enable them to join the Scheme, and then turn east or west).	Will enable cyclist-residents of Beeston College development to by-pass <b>all</b> of the tramlines.  Will also serve Barton Quarter.	More circuitous than "light blue".
TO SERVE BARTON QUARTER			
Pink	Junction with Scheme roughly opposite house shown as Number 71 on Ben Pentreath's masterplan for Barton Quarter. (11) Through boundary of Barton Quarter via entry/exit that's reserved for pedestrians & cyclists.  "Route" may consist of little more than the pedestrian/cyclist entrance/exit, a Toucan crossing on the A6005, and some signage.	Good for people cycling between Barton Quarter and destinations to the east.	People cycling between Barton Quarter and destinations to the west may prefer to use the Barton Way entry/exit.

*Table 4 – Implications of Figure 5 alignments for VIA East Midlands / Nottinghamshire County Council and for Broxtowe Borough Council*

**Note**

Table assumes standard two-tier division of roles between the two authorities.  
If this assumption is invalid – e.g. because EMDevCo is involved – amend accordingly.

<b><i>Colour in Figure 5</i></b>	<b><i>VIA East Midlands / Nottinghamshire County Council</i></b>	<b><i>Broxtowe Borough Council</i></b>
All	As well as preparing definitive design for the Scheme, prepare provisional design for cycle-routes between the Scheme and Barton Quarter/Beeston College, so VIA/Notts CC can: <ul style="list-style-type: none"> <li>• tell Broxtowe BC how much Broxtowe BC will need to levy from Barton Quarter/Beeston College developers via Section 106 / CIL</li> <li>• prepare “contingency plans” for the junction(s) between the Scheme and the cycle-route(s) between the Scheme and the developments.</li> </ul>	Ensure that the developers contribute (via Section 106 /CIL) to the cost of the cycle-routes – outside their developments, but underpinning their developments – linking their developments to the Scheme.
Light blue	Near the junction with Hall Croft, West End needs re-surfacing.	
Dark blue		If alterations will be needed to Barton Way / Bridge Avenue – to make them “no through road” for motor traffic, but “through road” for cyclists – negotiate with Barton’s accordingly.
Pink		Suggest to Barton’s that: <ul style="list-style-type: none"> <li>• those future residents of the Barton Quarter who need to travel to destinations to the east will benefit from having the “pink” cycle-link between that pedestrian/cycle entrance and the Scheme</li> <li>• so it’s desirable to have a pedestrian/cyclist entrance/exit near the house shown as Number 71 on Ben Pentreath’s masterplan. (11)</li> </ul>

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*Comments on Toton/Chetwynd SPD*

## Public transport

[REDACTED]

[REDACTED]

December 2021

## General

<i>Issue-number</i>	<i>Issue</i>	<i>Comments</i>
PT1	<p>To develop the within-site masterplan, it's first necessary to know where the following will be required:</p> <ul style="list-style-type: none"> <li>• bus-gates, particularly at the boundaries of the development</li> <li>• carriageways, railway crossings &amp; tramway crossings – suitably aligned for through-site bus-routes – within the development.</li> </ul> <p>But the likely bus-routes aren't yet known.</p> <p><b>The masterplan cannot be progressed until sufficient thought has been given to the likely bus-routes, so the masterplanners can be told about the:</b></p> <ul style="list-style-type: none"> <li>• <b>locations where bus-gates will be needed</b></li> <li>• <b>within-site “corridors” that will need providing for buses</b></li> <li>• <b>locations where interchanges will be needed.</b></li> </ul> <p>The SPD's Figure 25 seems to show 2 bus-gates. It seems likely that several more bus-gates will be required. See Figure 2 in the present document.</p>	<p>Despite Page 5 of the SPD saying that Mott MacDonald have assessed “how Toton &amp; Chetwynd Barracks should be accessed by ... public transport” – and despite Midland Connect's publication of <i>Access to Toton</i> – the SPD provides no tangible evidence of masterplanners having provided “corridors” for all the bus-services that will be needed to serve Toton/Chetwynd.</p> <p>The only wide-area planning which seems to have been done is that shown in <i>Access to Toton</i> (1), which:</p> <ul style="list-style-type: none"> <li>• doesn't show alignments in the detail needed for masterplanners to provide the within-site “corridors”</li> <li>• fails to show local-area routes from everywhere in the Toton/Chetwynd Development's likely commuter-belt</li> <li>• has been rendered obsolete by the recently-announced <i>Integrated Rail Plan</i>. (2)</li> </ul> <p>Unless plans for wide-area and local-area public transport are iterated in parallel with iterations of the masterplan, masterplanners cannot:</p> <ul style="list-style-type: none"> <li>• know where bus-gates are required</li> <li>• incorporate, into the masterplan, the within-site roads, rail-crossings, tramway-crossings &amp; interchanges that buses will need.</li> </ul>

<i>Issue-number</i>	<i>Issue</i>
PT2	<p>Because insufficient thought has been given to likely through-site bus-routes, <b>the SPD fails to comply with the “public transport” elements of national/local policies.</b></p> <ul style="list-style-type: none"> <li>• Chapter 9 of the <i>National Planning Policy Framework</i> (3), which says that “applications for development should ... give priority ... to facilitating access to high-quality public transport, with layouts that maximise the catchment area for bus ... services, and appropriate facilities that encourage public transport use”</li> <li>• Policy 14 of Broxtowe’s <i>Aligned Core Strategies</i>, (4) which says that “The need to travel, especially by private car, will be reduced by ... the delivery of sustainable transport networks to serve these developments”</li> </ul>



<i>Issue-number</i>	<i>Issue</i>
PT3	<p><b>Wherever the HS2 station is located, people will need to travel between the Toton/Chetwynd Development and E M Parkway.</b></p> <ul style="list-style-type: none"> <li>• If the HS2 station is at Toton, people will need to be able to travel between HS2 @ Toton and the Ratcliffe Development (and other EMDevCo locations).</li> <li>• If the HS2 station is at E M Parkway, people will need to be able to travel between the Toton/Chetwynd Development and HS2 @ E M Parkway.</li> </ul> <p><b>Presumably – despite the <i>Integrated Rail Plan</i> (2) – the options will still be broadly as envisaged in <i>Access to Toton</i> (1), i.e. “heavy rail”, tram and/or tram-train.</b> Figures 1 &amp; 2 of the present document show this service – and the existing “Nottingham – Beeston – Toton” tramline – in light blue.</p> <p>Pending delivery of a “heavy rail”, tram or tram-train link between Toton/Chetwynd and E M Parkway, a stopgap “rapid bus” link may be needed (using the A52, M1 &amp; A453).</p>
PT4	<p>People will need to travel between the Derby city-centre, Toton/Chetwynd Development, and Nottingham city-centre.</p> <p><b>A variant of the TrentBarton Red Arrow would provide an excellent service.</b> Figures 1 &amp; 2 of the present document show this service in red.</p> <p>If Derby city-centre, Toton/Chetwynd Development &amp; Nottingham city-centre can also be linked by a “heavy rail” service – as envisaged in <i>Access to Toton</i> (1) – so much the better.</p>

<i>Issue-number</i>	<i>Issue</i>
PT5	<p>There will be people who:</p> <ul style="list-style-type: none"> <li>• work in the Toton North/South “character areas”</li> <li>• live in: <ul style="list-style-type: none"> <li>○ Borrowwash, Draycott, Breaston, Attenborough</li> <li>○ parts of Beeston or Chilwell that aren’t served by the tram.</li> </ul> </li> </ul> <p>If the infrastructure is as shown in Figure 25 of the SPD, such people will have to use an Indigo/Skylink bus between their homes and Long Eaton Green, and then use some different public transport between Long Eaton Green and their workplace.</p> <ul style="list-style-type: none"> <li>• Expecting commuters to “change at Long Eaton Green” is unreasonable.</li> <li>• If people would have to “change at Long Eaton Green” then – despite <i>Aligned Core Strategies</i> Policies 14 &amp; 15 (4) – they may opt to commute by car, so increasing demand for car-parking within the Toton/Chetwynd site, and decreasing the amount of the site that’s available for productive use.</li> </ul> <p><b>To enable people who rely on public transport to travel between Toton North/South and Borrowwash, Draycott, Breaston, Attenborough, Beeston &amp; Chilwell, the following are needed:</b></p> <ul style="list-style-type: none"> <li>• <b>a bus-gate, aligned with Long Eaton’s Newstead Road</b></li> <li>• <b>a bus-bridge, to enable buses to cross the canal*</b></li> <li>• <b>a suitably aligned bridge/underpass, to enable buses to cross the railway line<sup>†</sup></b></li> <li>• <b>carriageways, suitable for buses, between the Newstead Road bus-gate and the Chetwynd Road bus-gate.</b></li> </ul> <p><b>Then (for example) TrentBarton will be able to serve these passengers by providing a variant of the Indigo service, using the route “Derby, ... , Longmoor Road, Newstead Road bus-gate, through Toton/Chetwynd Development, Chetwynd Road bus-gate, ... , Nottingham”. Figures 1 &amp; 2 of the present document show this service in purple.</b></p>

\* if the bus-service will be “every 20 minutes”, a suitably controlled single-carriageway bridge may be adequate.

<sup>†</sup> To avoid rat-running between the Toton West “character area”, and the Toton North/South “character areas”, the bridge/underpass could be restricted to buses, cyclists & pedestrians.

<i>Issue-number</i>	<i>Issue</i>
PT6	<p>The Stanton Ironworks site is likely to be redeveloped: (5)</p> <ul style="list-style-type: none"> <li>• north of Lows Lane, into the 4000-jobs New Stanton Park</li> <li>• south of Lows Lane, into 1000-homes housing.</li> </ul> <p>These developments will need a bus service.</p> <p>There will be people who:</p> <ul style="list-style-type: none"> <li>• need to commute to work in the Toton/Chetwynd Development (or travel to catch a train from Toton) from Ilkeston, Stapleford, Stanton Housing Development, Sandiacre, or Long Eaton</li> <li>• live in the Toton/Chetwynd Development, and need to commute to work in Ilkeston, New Stanton Park, Sandiacre, Stapleford, Long Eaton, E M Gateway, E M Airport.</li> </ul> <p>It would be unreasonable if their public transport was worse than the current TrentBarton my15 service (which links Ilkeston with E M Airport via Briargate).</p> <p><b>So there should (at least) be a variant of the my15 service which:</b></p> <ul style="list-style-type: none"> <li>• <b>serves New Stanton Park, and the Stanton Housing Development</b></li> <li>• <b>passes through the Toton/Chetwynd Development, via Bessell Lane (Stapleford) and Midland Street (Long Eaton).</b></li> </ul> <p>Figures 1 &amp; 2 of the present document show this service in pink.</p> <p>However, “rat running” should be prevented between Bessell Lane and Midland Street.</p> <p><b>So:</b></p> <ul style="list-style-type: none"> <li>• <b>bus-gates are required near where Bessell Lane (Stapleford) and Midland Street (Long Eaton) meet the boundary of the Toton/Chetwynd Development</b></li> <li>• <b>a carriageway, suitable for buses, is required between Bessell Lane and Midland Street.</b></li> </ul>



<i>Issue-number</i>	<i>Issue</i>
PT7	<p>Residents of the Bloor<sup>‡</sup> and Chetwynd developments will need public transport, for travel to destinations such as the following:</p> <ul style="list-style-type: none"> <li>• Toton Tesco Extra, and shops in Stapleford &amp; Chilwell Retail Park</li> <li>• tram-stops or bus-stops for onward travel to Ilkeston, Beeston, Nottingham, Long Eaton, etc.</li> </ul> <p>Provision of such public transport will be necessary to ensure compliance with the public transport elements of:</p> <ul style="list-style-type: none"> <li>• Chapter 9 of the <i>National Planning Policy Framework</i> (3)</li> <li>• Policy 14 of Broxtowe’s <i>Aligned Core Strategies</i> (4).</li> </ul> <p><b>These requirements could be satisfied by a local bus-route as follows:</b>  <b>Stapleford – Bloor – Chetwynd – Toton Tesco Extra – Chilwell Retail Park.</b>  Figures 1 &amp; 2 of the present document show this service in dark blue.</p> <p>Such a bus-route would cross the tramline. <b>Masterplanners should provide a (minor) interchange, to facilitate transfer between bus and tram.</b></p>
PT8	<p>Provision of a bus-gate on Chetwynd Road (near the Sports Ground) will provide an opportunity for a review of the route used by service 536.</p> <p>Rather than taking the circuitous route along Swiney Way, A6005 &amp; Attenborough Lane, the 536 could enter Chetwynd opposite Woodstock Road, travel through Chetwynd, and exit Chetwynd via the Chetwynd Road bus-gate. Figures 1 &amp; 2 of the present document show this service in green.</p> <p><b>This would require a bus-gate opposite Woodstock Road.</b></p>
PT9	<p>Several bus-routes will pass through Chetwynd.</p> <p><b>Masterplanners will need to provide a (minor) interchange.</b></p>

<sup>‡</sup> The prospective development, by Bloor Homes, north of the Toton East “character area”.

Figure 1 – Indicative public transport through Toton/Chetwynd Development

Shows the routes outlined in PT3 – PT8.

“Light blue” indicates tramline between Nottingham and Toton/Chetwynd, and “heavy rail”, tram and/or tram-train service between Toton/Chetwynd & HS2 @ E M Parkway. Other colours indicate bus-routes.

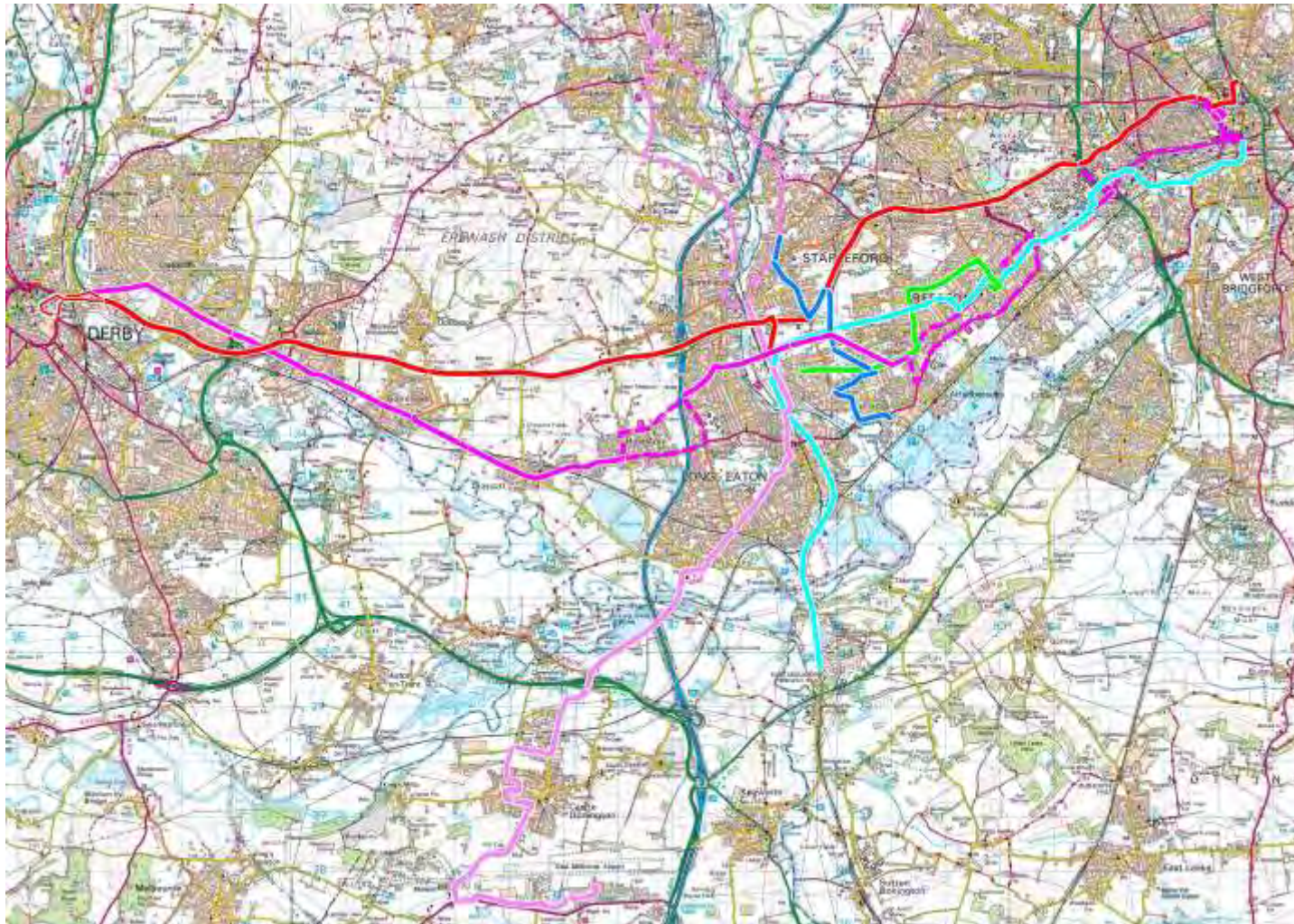
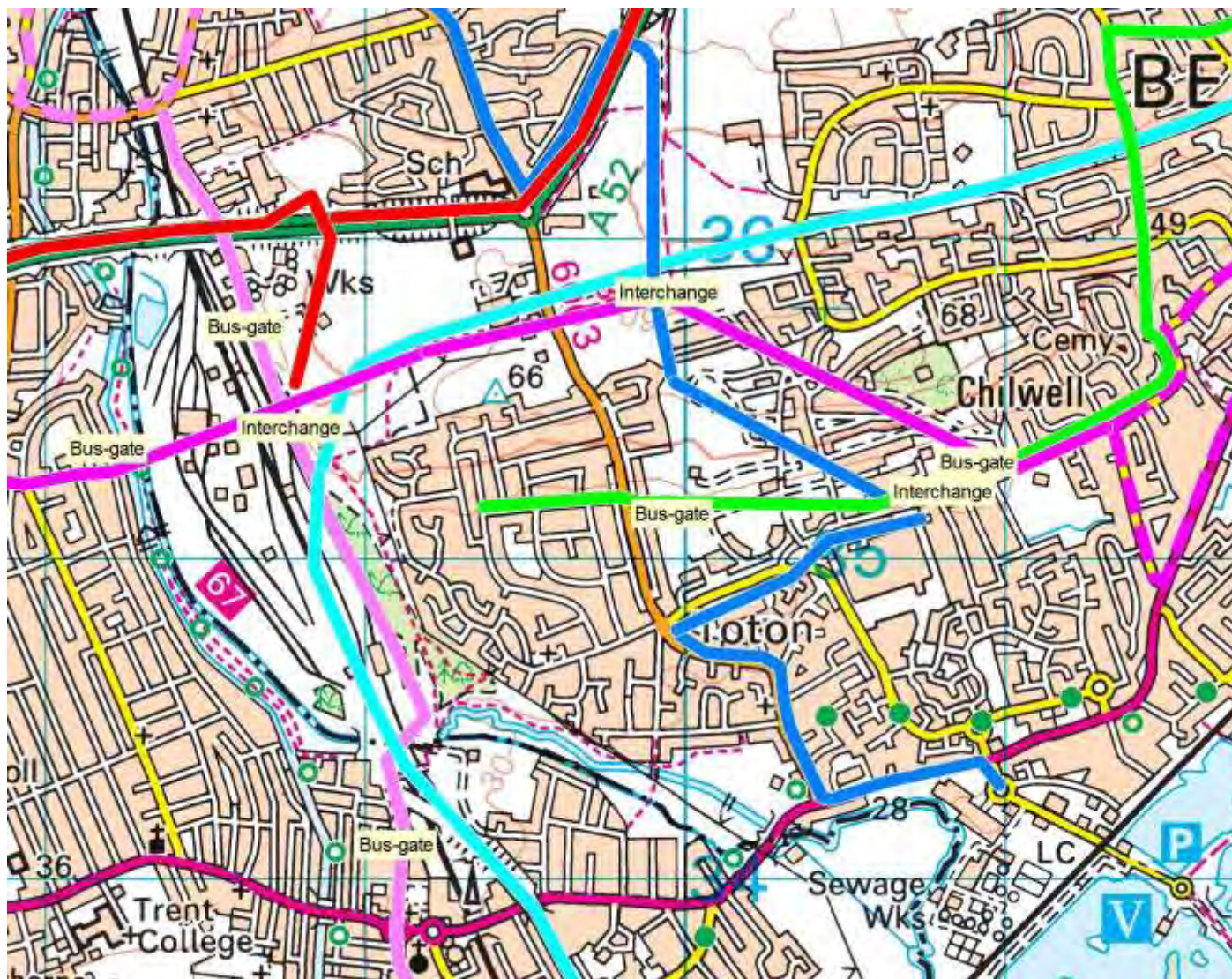




Figure 2 – magnified view of part of Figure 1

Shows bus-gates and interchanges.





## References

1. **Midlands Connect.** Access to Toton, the HS2 East Midlands Hub. [Online] May 2020. <https://www.midlandsconnect.uk/media/1706/final-access-to-toton-report.pdf>.
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3. **Ministry of Housing, Communities & Local Government.** National Policy Planning Framework. [Online] [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810507/NPPF\\_Feb\\_2019\\_print\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810507/NPPF_Feb_2019_print_revised.pdf).
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5. **Erewash Borough Council.** Erewash core strategy review - revised options for growth. [Online] March 2021. [https://www.erewash.gov.uk/images/Planning\\_Policy/Growth\\_Options.pdf](https://www.erewash.gov.uk/images/Planning_Policy/Growth_Options.pdf).

Representations about  
Toton/Chilwell *Neighbourhood Plan*

[REDACTED]

[REDACTED]

August 2022

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## Highlighting

The present document provides representations about the *Neighbourhood Plan*, embedded within some contextual material.

I've highlighted the representations.



## §1 Implications of *Integrated Rail Plan*

Since the *Neighbourhood Plan* (1) and the *Strategic Masterplan* (2) were published, the *Integrated Rail Plan* (3) has also been published. The latter envisages that:

- the HS2 station will be at East Midlands Parkway, rather than at Toton
- there may be a station at Toton, with a conventional train-service between Toton and East Midlands Parkway.

Consequently:

either new editions of the *Neighbourhood Plan* and *Strategic Masterplan* will need producing, re-worded to take account of the decision announced in the *Integrated Rail Plan*  
or people reading the *Neighbourhood Plan* and the *Strategic Masterplan* will need to bear in mind that any paragraphs which are based on the assumption that the HS2 station will be at Toton have been superseded.

## §2 Time scope

Broxtowe's *Local Plan Part 2* (4) covers the period until 2024. As such, it only needs to consider the implications, for green-belt, of Broxtowe's likely housing requirements until 2024.

By contrast, the *Neighbourhood Plan* covers the period until 2040. To be future-proof, the *Neighbourhood Plan* should at least do "contingency planning" on the implications, for green-belt, of the Area's likely housing requirements until 2040.

### §3 Geographic scope

#### §3.1 Wider-area travel infrastructure needed to underpin the development

By its nature, travel infrastructure is likely to be useless unless it continues beyond the boundary of the development.

- People who live within the area shown in the *Neighbourhood Plan's* Figure 1.1 will need to be able to travel to destinations outside the area for schools, shops & work.
- People who live outside the area will need to be able to travel to destinations within the area.

Requirements for wider-area underpinning infrastructure will include:

- 1) footways to/from destinations within walking distance [2 miles, say]
- 2) a network of cycle-routes to/from destinations within cycle-commuting distance [5 miles, in line with (4 p. 35) which says "cycling should be made a viable option for accessing the hub from within a 5-mile radius"]
- 3) the public transport network to/from destinations within commuting distance
- 4) the external road network to/from destinations within commuting distance, and for goods
- 5) ensuring that masterplans for the area shown in the *Neighbourhood Plan's* Figure 1.1 safeguard through-site "corridors" (including within-site bridges, etc) for (1)-(4).

Although (1)-(4) may be outside the geographic scope shown in the *Neighbourhood Plan's* Figure 1.1, they are a pre-requisite for (5) which is presumably within the scope.

#### §3.2 Masterplanning

Paragraph 3.11 of the *Neighbourhood Plan* deplores the piecemeal post-war development in which "Without a coherent plan for the whole Area, there has been less than ideal provision of services which has resulted in a range of negative impacts upon local communities".

Although an argument can be made for strictly restricting the geographic scope of the *Neighbourhood Plan* to the area shown in Figure 1.1 of the *Plan*, such a strict restriction will be counter-productive.

- There are two further places where there's again a risk of piecemeal development so that "without a coherent plan" there may again be "less than ideal provision of services" which will again result in "a range of negative impacts upon local communities".
  - The zone shown in rose in Figure 10.1 (though "outside the *Plan* area") and the zone shown in blue ("inside the *Plan* area") need a common masterplan, in order to ensure a seamless/coherent boundary between the two zones.
  - East of Stapleford Lane, there should be "contingency planning" for the zone south of the tramline (scheduled for development in the *Part 2 Local Plan*) and the zone north of the tramline (controlled by Peveril and Bloor) to have a common masterplan. Such "contingency planning" will ensure that – if/when the zone north of the tramline gets developed (perhaps after 2024 but before 2040) – there's a seamless/coherent boundary between the two zones.
- As stated in §3.1:
  - plans need producing for underpinning infrastructure over a far wider area than is shown in the *Neighbourhood Plan's* Figure 1.1
  - within-site "corridors" (including within-site bridges, etc) need safeguarding, within the area shown in the *Neighbourhood Plan's* Figure 1.1, to accommodate the through-site elements of the wider-area travel infrastructure.

## §4 Indicative plans for wider-area travel infrastructure

### §4.1 Introduction

Presumably some yet-to-be-identified public body will have overall responsibility for designing, obtaining funding for, and delivering the wider-area travel infrastructure necessary to unpin the Toton/Chetwynd Development. See §5.

Pending design-work by the yet-to-be-identified public body, the following sub-sections may give an indication of the infrastructure required.

### §4.2 Cycling & walking

As background:

- Chapter 9 of the *National Planning Policy Framework* (5) says that “Planning policies should ... provide for attractive and well-designed walking and cycling networks ... (drawing on Local Cycling & Walking Infrastructure Plans)”.
- The Department for Transport’s *Local Cycling & Walking Infrastructure Plans – Technical Guidance for Local Authorities* (6) says that suggested applications of LCWIPs include “cycling and walking ‘proofing’ of major schemes”.
- The current D2N2 LCWIP (7) is very sparse in the Toton/Chilwell and Ratcliffe-on-Soar areas. Its proposals are inadequate for the trips likely to be generated by the Toton/Chetwynd and Ratcliffe developments.
- Policies 14 & 15 in Broxtowe’s *Aligned Core Strategies* (8) and Erewash’s *Core Strategy* (9) say that “the priority for new development is in firstly selecting sites already accessible by walking, cycling ... but where accessibility deficiencies do exist these will need to be fully addressed”.
- Broxtowe’s *Part 2 Local Plan* (4 p. 35) says that “cycling should be made a viable option for accessing the hub from within a 5-mile radius”.
- The *Strategic Masterplan* (2 p. 35) says that the Toton/Chetwynd Development will have “unparalleled connectivity through new ... walking & cycling links”.

Clearly the Toton/Chetwynd Development is a “major scheme” which needs “cycling and walking ‘proofing’”, in order to have “unparalleled connectivity through new ... walking & cycling links”. The “yet-to-be-identified public body” should produce an LCWIP (or a supplementary LCWIP) for the area within a 5-mile radius of the Toton/Chetwynd Development.

Pending the production of an official LCWIP, *Making cycling a viable option for accessing Toton Area Development from within a 5-mile radius* (10) gives an indication of the cycling/walking infrastructure that will be required. However, the **Integrated Rail Plan has increased the importance of providing high-quality cross-Trent cycle-routes** between “Ratcliffe Development & HS2 @ E M Parkway” and both:

- the Chetwynd Barracks part of the Toton/Chetwynd Development
- the Toton “Innovation Campus” part of the Toton/Chetwynd Development.

Incidentally, VIA East Midlands’ current work on delivering a high-quality cycle-route on/near the A6005 corridor – funded by the Transforming Cities Fund – could provide an opportunity for (in effect) a high-quality “Nottingham – Toton/Chetwynd Development – Derby” cycle-route. (11 pp. 7-8)

Masterplans for the Toton/Chetwynd Development will need to safeguard the corridors required for the cycle-routes to/from destinations within the 5-mile radius. Within the Development, it will be more important to choose alignments that have moderate gradients (12 p. 46) than to align the routes with “green infrastructure”. This may have implications for Figures 9.2, 9.5 & 14.2 in the *Neighbourhood Plan*.



## §4.3 Public transport

As background:

- Chapter 9 of the *National Planning Policy Framework* (5) says that “applications for development should ... give priority ... to facilitating access to high-quality public transport”
- Policies 14 & 15 in Broxtowe’s *Aligned Core Strategies* (8) and Erewash’s *Core Strategy* (9) say that “the priority for new development is in firstly selecting sites already accessible by ... public transport, but where accessibility deficiencies do exist these will need to be fully addressed”.
- The *Strategic Masterplan* (2 p. 35) says that the Toton/Chetwynd Development will have “unparalleled connectivity through new public transport... links”.

Pending the production of a successor to *Access to Toton* (13), my *Comments on Toton/Chetwynd SPD – Public transport* (14 pp. 7-8) gives an indication of the public transport that will be required.

Masterplans for the Toton/Chetwynd Development will need to safeguard the corridors required for the public transport network. This will have implications for Figures 9.3, 9.5 & 14.1 in the *Neighbourhood Plan*.

The *Neighbourhood Plan* and the *Strategic Masterplan* advocate different alignments for “the tramline extension”.

- In the *Neighbourhood Plan*, Figures 9.3, 9.5 & 14.1 show the tramline adjacent to the A52 (which could imply a lack of public transport in the south of the “Toton South” character area)
- In the *Strategic Masterplan*, Figure 25 shows the tramline roughly midway between the A52 and the existing Toton built-up area (which could imply a lack of public transport near the boundaries of the Toton North/South character areas).

But hopefully the Toton North/South “character areas” will be served by good-quality buses as well as by “the tramline extension”. So, from the point-of-view of potential passengers:

- It may not much matter whether their nearest “stop” is for a bus or a tram, as long as that “stop” is within walking distance.
- It may matter whether – if their journey involves segments provided by more-than-one operator – they have to buy more-than-one ticket (making the overall journey disproportionately expensive).

Rather than ...

- deciding on the alignment for the tramline extension on isolation

... it may be better to ...

- design a coherent public transport network for the Toton North/South character areas, consisting partly of bus services and partly of the tramline extension
- regard the alignment of the tramline as “an output from the overall network-design process” rather than as “an input to the network-design process”
- make an effort to organise “integrated ticketing” (so journeys that involve segments provided by more-than-one operator – e.g. a TrentBarton segment and a NET segment – aren’t disproportionately expensive).

As in *Access to Toton*, the network-design should involve bus-or-tram services between the Toton North/South character areas and destinations to Derby (i.e. without passengers having to “change at Long Eaton town-centre”). So there will need to be a bus-or-tram bridge, across the railway, between Toton North/South and the Dockholm Lock area. This may have implications for Figures 9.3, 9.5 & 14.1 in the *Neighbourhood Plan*.

#### §4.4 Highways

Both the *Neighbourhood Plan* and the *Strategic Masterplan* envisage a new north-south link road, based on the hypothesis that such a road will cater for the new motor-traffic generated by the Toton/Chetwynd Development, and so will avoid the Development adding to the congestion on existing roads.

As far as I know, the most recent modelling of the effects that the Development is likely to have was by Peter Brett Associates (PBA) in 2017. (15) The PBA study:

- only considered the likely effects of developing Chetwynd Barracks (not the effects of developing the whole Toton/Chetwynd site)
- did not consider a new north-south link road
- did not consider whether Chilwell High Road (e.g. near Landermeads Care Home) has the capacity for the additional bus-traffic likely to be generated by the Development.

Without some up-to-date comprehensive modelling of the effects that the whole Development is likely to have on congestion on existing roads, it seems premature for anyone – whether in a *Neighbourhood Plan* or in a *Strategic Masterplan* – to take it for granted that:

- the “north-south link road” is the only highway intervention that is worth considering
- constructing the “north-south link road” will be sufficient to avoid traffic generated by the Development producing unacceptable congestion on existing roads.

Moreover, as stated in §3.2, there needs to be “contingency planning” in relation to potential development (between 2028 and 2040) east of Stapleford Lane in the zone (controlled by Peveril and Bloor) north of the tramline. The Development’s road-layout needs to be future-proof, so that it can (if required) provide access to that zone.

All of the above may have implications for:

- Figure 25 in the *Strategic Masterplan*
- the references to “north-south primary access road” in the *Neighbourhood Plan*
- Figures 9.3, 9.5 & 14.1 in the *Neighbourhood Plan*.

## §5 Who is responsible for delivering the wider-area infrastructure?

Paragraph 19.3 of the *Neighbourhood Plan* attempts to identify responsibility for certain aspects of delivery.

The question of who will be responsible for delivering the underpinning wider-area infrastructure also needs resolving. As stated in §3.1, the requirements will include:

- 1) footways to/from destinations within walking distance (2 miles, say)
- 2) a network of cycle-routes to/from destinations within cycle-commuting distance (5 miles, say)
- 3) the public transport network to/from destinations within commuting distance
- 4) the road network to/from destinations within commuting distance, and for goods
- 5) ensuring that masterplans for the area shown in Figure 1.1 of the *Neighbourhood Plan* provide through-site “corridors” (including within-site bridges, etc) for (1)-(4).

Will overall responsibility for the necessary underpinning wider-area infrastructure be undertaken by one of the following organisations?

- Transport for the East Midlands
- Midlands Connect
- D2N2
- East Midlands Development Company
- Nottinghamshire County Council
- Broxtowe Borough Council.

If not, which organisation **will** have the overall responsibility?

**Because (1)-(4) are pre-requisites for (5), the question of “who will have overall responsibility” needs resolving promptly.**

- Until it is resolved, there won’t be any tangible plans for (1)-(4).
- Without tangible plans for (1)-(4), neither the masterplanners in the Neighbourhood Forum (for the *Neighbourhood Plan*) nor the masterplanners in Broxtowe Borough Council (for the *Strategic Masterplan*) will know what through-site “corridors” will need safeguarding to accommodate the wider-area travel infrastructure.

## §6 Funding the wider-area infrastructure

Paragraph 19.10 of the *Neighbourhood Plan* envisages obtaining financial contributions towards infrastructure by negotiating:

- Section 106 contributions
- Community Infrastructure Levy.

It will also be possible to bid for funding from relevant central government schemes. Recent schemes have included:

- Department for Transport’s *Cycling & Walking Investment Strategy* and *Transforming Cities Fund*
- Department for Levelling Up, Housing and Communities’ *Levelling-Up Fund*.

The remit of whichever organisation has overall responsibility for the underpinning wider-area infrastructure (see §5) should include:

- being alert for announcements of opportunities to bid for central government funding
- preparing high-quality bids for such funding.



## References

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 01 August 2022 19:57  
**To:** Policy  
**Subject:** CTTC Forum Reg 16 response  
**Attachments:** CTTC Plan Reg16 consultation.docx

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi

Please find attached a response document from [REDACTED] relating to this consultation

Kind regards

[REDACTED]

[REDACTED]

# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name

## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> :
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	<input type="text"/>
Address	<input type="text"/>
Postcode	<input type="text"/>
E-mail address	<input type="text"/>

**Comments should be received by 5<sup>th</sup> August 2022**

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes

☒

No

☐

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

**[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)**

**Data Protection** - The comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

**Please return completed forms to:**

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).



**1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

Our comments relate to the whole of the Neighbourhood Plan as submitted and subsequently amended.

**2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☒

Support with  
modifications ☐

Oppose ☐

Have Comments ☐

**Please give details of your reasons for support/opposition, or make other comments here.**

We fully support and endorse the Neighbourhood Plan. I [REDACTED] was part of the Steering Group and played a significant part in drafting the Plan and taking it through various consultation stages with our community. We are convinced the Plan represents the views of the vast majority of our residents. This is based on the reasonable assumption that the large numbers of residents who attended our consultation sessions were a pretty fair reflection of all residents of the Toton and Chilwell Forum Area.

It is true the Plan was developed on the assumption that the East Midlands HS2 Hub Station would be built. Nevertheless, the Plan – and in particular its policies, was constructed 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.

We have read the Council Officers' comments submitted to the July Council Cabinet meeting with some dismay. There seemed to be a recurring criticism is that many of the individual policies contained supporting justification that could be construed as further policy requirements. This was categorically not our intention. We were/are amateurs when it comes to using correct terminology in defining Plan policies. And I am happy to make clear that nothing in any of the supporting paragraphs justifying each policy should be taken to be additional policy requirements. The policies as defined in the Plan should be taken as complete even though they may be imperfectly worded.

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 27 July 2022 12:33  
**To:** Policy  
**Subject:** Response to Neighbourhood Plan....  
**Attachments:** '22 July 27 chetwynd-toton-chilwell-neighbourhood-plan-regulation-16-consultation-form(1).pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Herewith.

[REDACTED]



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# Chetwynd: The Toton and Chilwell Neighbourhood Plan (Regulation 16) Consultation Response Form



Broxtowe  
Borough  
COUNCIL

Agent (if applicable)

Please provide your client's name	
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## Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Name	<input type="text"/>
Organisation (if responding on behalf of an organisation)	<input type="text"/>
Address	<input type="text"/> <input type="text"/>
Postcode	<input type="text"/>
E-mail address	<input type="text"/>

**Comments should be received by 5<sup>th</sup> August 2022**

Please state whether or not you would like to be notified of the local planning authority's decision (to 'make' or 'refuse' the Chetwynd: The Toton and Chilwell Neighbourhood Plan).

Yes ☒ No ☐

If you require any assistance in completing this form, please do not hesitate to contact the Planning Policy Team on 0115 917 3452 or 3015 or via email: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

For more information please visit:

**[www.broxtowe.gov.uk/chetwyndneighbourhoodplan](http://www.broxtowe.gov.uk/chetwyndneighbourhoodplan)**

**Data Protection** - The comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

**Please return completed forms to:**

Planning Policy Team, Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB or via email to: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).



- 1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

The whole of the Forum's overall Plan.

[I have spent many hours carefully reading through the paperwork kindly sent to me, and a few more hours trying to organise my response/s to conform to your required format of division into separate policy, aspiration etc. but without success. I hope, therefore, that what follows will be found acceptable.]

- 2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☒

Support with  
modifications ☐

Oppose ☐

Have Comments ☐

**Please give details of your reasons for support/opposition, or make other comments here.**

The Plan certainly is ambitious. It's also highly impressive in the extent of its forward-looking (green and sustainable) vision, its admirable, inter-connected and community-oriented aims, and its carefully-researched and thoughtful detail. It is clear that all the 'core objectives' and 'key themes' identified in Section B (pp.33-4) are intended to support and reinforce each other – that each requires the implementation of the corresponding policies presented for the other/s. All of these are clearly set out in Section D, with detailed (and convincing to me) justifications for each supporting policy. For the even more detailed and specific Section C (the Barracks area), I strongly support the Guidelines and Aspirations, including Aspiration 06 for a 'regional Imperial War Museum' in Building 157 (p.53).

Overall, an admirable document. I hope it will be supported by the Council.

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 19 July 2022 16:59  
**To:** Policy  
**Subject:** Consultation response to Chetwynd: The Toton and Chilwell Neighbourhood Plan  
**Attachments:** chetwynd-toton-chilwell-neighbourhood-plan-regulation-16-consultation-form - [REDACTED].pdf

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Hi, please see attached response to the consultation. Thanks.

Regards

[REDACTED]





**1. Please state which part of the Neighbourhood Plan (i.e. which policy, aspiration, section, objective or paragraph) your representation refers to (please complete a separate form for each representation)**

ENV03 (P59)

Establishment of new blue/green infrastructure in the Strategic Location for Growth (SLG) should be in line with the Aligned Core Strategy policy and should incorporate two new linear features which will contribute green space as both corridors and accessible natural green space. These green spaces need be of significant width/area to accommodate their multifunctional use.

**2. Do you support, oppose, or wish to comment on this policy, aspiration, section, objective or paragraph? (select one)**

Support ☐ Y

Support with  
modifications ☐

Oppose ☐

Have Comments ☐

**Please give details of your reasons for support/opposition, or make other comments here.**

There is massive development proposed for Toton and Chilwell and there is a significant risk of this destroying both communities and the local environs. Therefore, the whole neighbourhood plan is an excellent framework formulated by local people that will hopefully ensure the development is completed in a sympathetic and appropriate way and ultimately will improve both communities dramatically. I support the whole plan.

In particular, I am very keen to see the protection of the environment as much as possible including ensuring green spaces are maintained / created / enhanced. The proposed green corridors will allow safe and healthy access to and across the area.

I urge the council to adopt the plan.

***This form is available in large print and other formats on request.***

Please use a separate sheet of paper if required.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 05 August 2022 15:16  
**To:** Policy  
**Subject:** Toton Neighbourhood Plan (Regulation 16) Consultation Response  
**Attachments:** Toton Neighbourhood Plan (Regulation 16) Consultation Response.txt

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please find attached my response to the consultation.

Regards,  
[REDACTED]

## Toton Neighbourhood Plan (Regulation 16) Consultation Response

\*\*\*\*\*

### Toton Neighbourhood Plan (Regulation 16) Consultation Response



Data protection: Permission given to use this data.

Do not add me to planning database. Do not notify me of decision.

\*\*\*\*\*

Oppose. The Toton Neighbourhood Plan should be rejected.

\*\*\*\*\*

Policies:

13. Environment.

New Policy:

Plan needs to specify details of mitigation of noise from HS2 & classic rail trains and station. From demonstrations at HS2 roadshows, with full noise mitigation, HS2 trains will be clearly audible on Banks Road. As confirmed by HS2 sound engineers, rows of trees do not mitigate noise. 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.

ENV01:

Given the expected loss of nearly all of Toton's green belt to development (the Sidings and the land west & east of Toton Lane/Stapleford Lane), very little green infrastructure is proposed. In particular, there is no attempt to protect the Toton Local Wildlife Site & adjoining woodland to the south (at the Sidings, west of the embankment), or the surviving green belt land east of Toton Lane/Stapleford Lane.

ENV02:

Funding for green spaces by developers should be included in the Community Infrastructure Levy & Section 106 agreements.

ENV03:

The connecting corridors have already been proposed by local government & developers. For example, Peveril's original application contained a linear park from the Sidings to Stapleford Lane, separating the existing estate from the new.

## Toton Neighbourhood Plan (Regulation 16) Consultation Response

ENV07:

As part of HS2 construction, the Environment Agency intend to improve the drainage & biodiversity of the Erewash floodplain.

Figure 13.1 et al:

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.

### 14. Infrastructure.

New Policy:

The Toton-Nottingham tram should be evaluated against its objective: reducing road congestion.

INF01:

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. Not defer until development.

INF02:

Plan needs to detail and justify the new road proposals around Bardills roundabout, in particular the road north-south from the A52 to the barracks, using the traffic survey mentioned above. From observation, Bardills roundabout is not congested.

These new roads are not needed for HS2, which has its own A52 junction. Access to development at the Sidings & adjacent should use HS2's A52 junction, rather than Toton Lane/Stapleford Lane.

The new junction east of Bardills roundabout will likely open up for development the green belt strip south of the A52 from Toton to Bramcote. A new road north-south from the barracks to the A52, if necessary, was already proposed in a 2016 Broxtowe BC consultation with the caveat that this green belt was already under development.

INF03:

While pedestrians should not have to share pavements & footpaths with cyclists, Plan needs to justify demand for more cycle lanes. Traffic on Toton roads is not heavy. From observation, confident cyclists ride in the road, while cyclists lacking confidence ride on the pavement, irrespective of a cycle lane. The white lines on pavements separating cyclists from pedestrians are a slippery hazard in winter.

INF03&07:

Plan is too HS2-centric. Plan needs to recognise that classic rail, e.g. Long Eaton railway station, will remain more popular with Toton residents than HS2, because HS2 will charge premium fares.

INF04:



Toton Neighbourhood Plan (Regulation 16) Consultation Response  
Plan needs to specify the implementation of separated cycle lanes. The Forum has proposed making Epsom Road & Woodstock Road one-way, and presumably Banks Road too.

INF06:

Plan needs to specify an alternative approach to a Residents Parking Scheme, such as restricting pedestrian access to the station from Banks Road. The Scheme may be necessary, but it seems unpopular with residents. Enforcement requires funding which, if passed onto residents, will cause the Scheme's collapse.

There may also be a problem with motorists ferrying (dropping off & collecting) rail passengers along Banks Road, a problem which would not be addressed by a Residents Parking Scheme.

## 15. Housing.

New Policy:

Since the HS2 station has been moved from Toton Sidings to East Midlands Parkway, the intended development for Toton Sidings & the adjacent land west & east of Toton Lane/Stapleford Lane should also move to the Parkway. Parkway offers far greater scope for green belt development and, consequently, was always HS2's preferred choice. 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.

New Policy:

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 (Sidings, west & east of Toton Lane/Stapleford Lane and the barracks), Plan should specify the intended housing numbers & densities, together with the area sizes (hectares) required. These requirements should be compared with those of the pre-HS2 Core Strategy.

The proposed housing density at the barracks is too high. The densities of other new developments around Beeston are far lower, comparable to that of the Banks Road estate (about 20 houses per hectare). Reduce the number of houses.

HAS01:

Local government already requires that 30% of new housing is affordable.

HAS07:

Plan needs to justify support for modular building. 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.

## 16. Urban Design.

URB05:

Presumably the mix of employment & residential accommodation in the business park is to make the transition to housing estate easier when the business park fails. Flats converted from offices are not bound by minimum size regulations

Toton Neighbourhood Plan (Regulation 16) Consultation Response  
and do not require contributions to the Community Infrastructure Levy. The  
business park may acquire many blocks of student accommodation.

## 17. Leisure.

### New Policy:

For each development (Sidings, west & east of Toton Lane/Stapleford Lane and the barracks), Plan should specify the area sizes (hectares) required for community infrastructure (schools, health, shops & community buildings) and green space.

### LHC01&04&05&07:

Secondary school expansion, primary schools, medical centres, shops, community buildings & open spaces required by new housing developments are specified by Section 106 agreements.

While Toton will double in size, there are no amenities proposed to benefit existing residents. Broxtowe BC has explicitly forbidden them, to protect the town centres of Beeston & Stapleford.

### LHC04:

Plan needs a detailed forecast of demand on the school from the new developments (Sidings, west & east of Toton Lane/Stapleford Lane and the barracks), and an estimate of the additional land & buildings required, irrespective of whether the school moves.

Plan needs to detail how a move would be funded, since government no longer funds new school buildings. For example, a Bramcote school, needing new buildings, is selling off some of its playing fields for housing.

Seemingly, the new site of the school is encircled by existing & proposed new roads and offers no extra space.

### LHC06:

Perhaps an outside, heated swimming pool could be provided for the school.

## 18. Employment.

### New Policy (repeated from Housing):

Since the HS2 station has been moved from Toton Sidings to East Midlands Parkway, the intended development for Toton Sidings & the adjacent land west & east of Toton Lane/Stapleford Lane should also move to the Parkway. Parkway offers far greater scope for green belt development and, consequently, was always HS2's preferred choice. 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.

### New Policy:

Plan needs to justify demand for the business park. The business park is unnecessary. The estimate of 10,000 jobs is arbitrary. As was the DfT's estimate of only 1,500 jobs supported by HS2.

For each development (Sidings, west & east of Toton Lane/Stapleford Lane and the

Toton Neighbourhood Plan (Regulation 16) Consultation Response  
barracks), Plan should specify the intended employment floorspace, together with the area sizes (hectares) required. These requirements should be compared with those of the pre-HS2 Core Strategy.

EMP01:

Plan needs to explain the term "innovation campus". Nottingham already has science parks. The term is a marketing phrase used by property developers promoting gentrification.

Local government requires that developers provide new employment space in return for permission to build housing estates.

\*\*\*\*\*

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 04 August 2022 11:52  
**To:** Policy  
**Cc:** [REDACTED]  
**Subject:** Response to Consultation Chetwynd: The Toton and Chilwell Neighbourhood Plan :  
Broxtowe Borough Council

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sirs

Much hard work and community effort has gone into preparing the Neighbourhood Plan over a long interval, which must be welcomed and in some way harnessed for the future.

However, the challenge is that this consultation document appears to have been prepared before the Government announcement on 18 November 2021 that Toton would no longer be the East Midlands' HS2 Hub - a decision with knock-on effects for the plan that go well beyond just editing out references to HS2.

This HS2 about-turn raises basic questions about the future of the whole Toton - Chetwynd area. For example will the Innovation Park - anticipated as being integrated into the Hub concept - be retained and will there even be a station of any kind at Toton? Essentially the HS2 decision implies a rethink of the plan as a whole. The more recent decision to retain the Barracks for another two years until 2026 may also impact on the timing of elements of the plan, including road proposals presently being prepared by Notts CC.

There is another issue. Having browsed online I decided to look at the printed documents said to be available in Foster Avenue in the notice below, going along to inspect between 2 and 3pm on Friday 7 July in normal business hours.

The Council Office had nothing to inspect and, worse still, did not seem to know anything at all about the consultation. After an hour I came away with a copy of the Toton and Chetwynd Barracks Strategic Masterplan dated October 2021, but nothing else. Unsurprisingly this Masterplan also needs revising to take account of policy-about turns, as this too has been overtaken by events.

My instinct is to advise that the Government HS2 decision invalidates this particular consultation as well as the Masterplan and possibly more. They need revising to take account of the new circumstances, with fresh consultations at some point in future.

The absence of material to inspect might, at the very least, also be grounds for complaint, if not in itself invalidating this particular Neighbourhood Plan consultation.

[REDACTED]



[https://www.broxtowe.gov.uk/chetwyndneighbourhoodplan?utm\\_source=Beeston+Civic+Society+membership&utm\\_campaign=ba189ca094-EMAIL\\_CAMPAIGN\\_2022\\_06\\_22\\_01\\_38\\_COPY\\_02&utm\\_medium=email&utm\\_term=0\\_64d6507f11-ba189ca094-235219901](https://www.broxtowe.gov.uk/chetwyndneighbourhoodplan?utm_source=Beeston+Civic+Society+membership&utm_campaign=ba189ca094-EMAIL_CAMPAIGN_2022_06_22_01_38_COPY_02&utm_medium=email&utm_term=0_64d6507f11-ba189ca094-235219901)

# Chetwynd: The Toton and Chilwell Neighbourhood Plan

## Chetwynd: The Toton and Chilwell Neighbourhood Plan Regulation 16 Consultation

### Neighbourhood Plan Submission:

The Chetwynd: The Toton and Chilwell Neighbourhood Forum has submitted its proposed Neighbourhood Plan to Broxtowe Borough Council.

The Borough Council is now inviting your views on the Neighbourhood Plan proposals. The Neighbourhood Plan and related documents can be viewed below:

- [Chetwynd: The Toton and Chilwell Neighbourhood Plan](#) (Opens in a New Window);
- [Chetwynd: The Toton and Chilwell Neighbourhood Plan Policies Map](#) (Opens in a New Window);
- [Map of the area covered by the Neighbourhood Plan](#) (Opens in a New Window);
- [Notice of the Consultation](#) (Opens in a New Window);
- [Consultation Statement](#) (Opens in a New Window);
- [Basic Conditions Statement](#) (Opens in a New Window);
- [Strategic Environmental Assessment \(SEA\) and Habitats Regulations Assessment \(HRA\) Screening Report](#) (Opens in a New Window), [Screening Opinions from Historic England](#) (Opens in a New Window) and [Natural England](#) (Opens in a New Window), and [Final Conclusions](#) (Opens in a New Window);
- [Strategic Environmental Assessment \(SEA\) produced by AECOM on behalf of the Neighbourhood Forum](#) (Opens in a New Window);
- [Plan Modifications \(April 2020\)](#) (Opens in a New Window); and,
- [Supplementary Plan Modifications \(October 2021\)](#) (Opens in a New Window).

Paper copies of the Neighbourhood Plan, Policies Map, and supporting documents, (including the Consultation Statement, Basic Conditions Statement, and Strategic Environmental Assessment) are also available to view in the Reception of the Council Offices, Foster Avenue, Beeston, Nottingham NG9 1AB (during normal opening hours).

**If you would like to make comments on the Neighbourhood Plan proposals, please use our [online Response Form](#) (Opens in a New Window) or you can email us using the form in [PDF format](#) (Opens in a New Window) and [Word format](#) (Downloads), to Broxtowe Borough Council at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk) or send them to the Council by post to:**

Chetwynd: The Toton and Chilwell Neighbourhood Plan Consultation  
Planning Policy Team  
Broxtowe Borough Council  
Council Offices  
Foster Avenue  
Beeston, Nottingham  
NG9 1AB

**Paper copies of the Response Form are also available in the Reception of the Council Offices.**

**The consultation will run from Wednesday 8<sup>th</sup> June until Friday 5<sup>th</sup> August 2022 (The consultation period has been extended by two weeks) . All responses must be received within this time.**

Please also let us know if you would like to be notified when a decision is taken by the Borough Council on whether or not to ‘make’ the plan (i.e. if it is adopted as Council Policy under Regulation 19).

If you require any further information or assistance in relation to this public consultation or the Neighbourhood Plan document, please do not hesitate to contact the Planning Policy Team on **0115 917 3452 or 3015**. You can also email us at [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

**Data Protection** - The comment(s) you submit on the Chetwynd: The Toton and Chilwell Neighbourhood Plan will be used in the plan process and may be in use for the lifetime of the Chetwynd: The Toton and Chilwell Neighbourhood Plan in accordance with the Data Protection Act 2018. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will

be made available for public inspection. All representations can be viewed at the Council Offices. A copy of Broxtowe Borough Council's Planning Policy Privacy Notice is available on our website at the following link: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/planning-policy-privacy-statement/>.

## Re-designation of the Chetwynd: The Toton and Chilwell Neighbourhood Forum

In accordance with Section 61F of the Town and Country Planning Act 1990 (as amended), Broxtowe Borough Council resolved at its meeting on 2<sup>nd</sup> March 2022 to re-designate the Chetwynd: The Toton and Chilwell Neighbourhood Forum for the [Chetwynd: The Toton and Chilwell Neighbourhood Area](#) (Opens in a New Window).

Regulation 10 of the Neighbourhood Planning (General) Regulations 2012 (as amended), requires that the following information in relation to the re-designation of the Chetwynd: The Toton and Chilwell Neighbourhood Forum be published by the local planning authority:

- The name of the Neighbourhood Forum: **Chetwynd: The Toton and Chilwell Neighbourhood Forum**;
- A copy of the written [constitution of the Neighbourhood Forum](#) (Opens in a New Window).
- The name of the Neighbourhood Area to which the designation relates: **Chetwynd: The Toton and Chilwell Neighbourhood Area**; and,
- Contact details for at least one member of the Neighbourhood Forum: **Richard Hutchinson (Chair), email: [cttcnf@gmail.com](mailto:cttcnf@gmail.com) or [assist.cttcnf@gmail.com](mailto:assist.cttcnf@gmail.com)**.

This information is also set out within the Council's [Decision Notice](#) (Opens in a New Window).

## Background

The Chetwynd: The Toton and Chilwell Neighbourhood Forum submitted an application to 're-designate' the Neighbourhood Forum, as the original designation was due to expire on 9 March 2022.

The Forum's [application](#) (Opens in a New Window) included the following information:

- (a) the name of the proposed Neighbourhood Forum;

- (b) a link to a copy of the written constitution of the proposed Neighbourhood Forum;
- (c) the name of the neighbourhood area to which the application relates and a link to a map which identifies the area;
- (d) the contact details of at least one member of the proposed Neighbourhood Forum to be made public under regulations 9 and 10; and
- (e) a statement which explains how the proposed Neighbourhood Forum meets the conditions contained in section 61F(5) of the 1990 Act.

Please note that as the Council has taken the decision to re-designate the Neighbourhood Forum, no other organisation or body may be designated for this neighbourhood area until this designation expires or is withdrawn.

All representations received were carefully considered by the Council prior to the decision being taken to re-designate the Neighbourhood Forum. A copy of the responses received to this consultation (with personal information redacted) can be viewed in the [Redacted Responses document](#) (Opens in a New Window).

If you have any questions or would like any further information in relation to this decision or the Chetwynd: The Toton and Chilwell Neighbourhood Forum, please contact the Borough Council's Planning Policy Team on 0115 917 3452 or 3015 or via email at: [policy@broxtowe.gov.uk](mailto:policy@broxtowe.gov.uk).

## **Other Documents**

### **Neighbourhood Area Designation:**

- [View the Neighbourhood Area Application](#) (Opens in a New Window)
- [View the Map of Neighbourhood Designation Area \(as amended\)](#) (Opens in a New Window)
- [View the Neighbourhood Area Decision notice](#) (Opens in a New Window)

### **Original Neighbourhood Forum Designation:**

- [View the Neighbourhood Forum Application](#) (Opens in a New Window)
- [View the Neighbourhood Forum Constitution](#) (Opens in a New Window)



- [View the Map of Neighbourhood Forum Area \(as amended\)](#) (Opens in a New Window)
- [View the Neighbourhood Forum Decision Notice](#) (Opens in a New Window)

id	Please state which part of the Neighbourhood Plan (i.e. which po	Do you support, oppose, or wish to comment on this policy, aspir	Please give details of your reasons for support/opposition, or m
822136	<p>New Junction off A52 between Sherwin Island and Bardills Island . .Also any plans to move Broxtowe leisure centre out of Broxtowe .</p> <p>This is about the north-south access road in section 9 where the Toton and Chilwell Forum's vision for the Neighbourhood area includes a vision 'to build a new north-south access primary road to ease traffic congestion before the new homes are built' .</p>	Oppose	<p>The New proposed junction off the A 52 between Sherwin Island and Bardills Island south through the greenbelt,over tram lines and beyond is unnecessary and will add to congestion on the A52,create further air pollution and hinder Broxtowes goal to be carbon neutral by the end of this decade,plus being a waste of money.....I also object to the aspiration for South Broxytowe leissue centre to be anywhere other than in Bramcote</p> <p>1] It will add to congestion on the A52, 2] It will worsen air pollution and hinder achieving Broxtowe’s goal to be carbon neutral by the end of this decade and 3] there is a huge cost implication and many millions of pounds of public money would be diverted from more important projects.</p>
822053	<p>POLICY ENV03.</p> <p>a) A north-south corridor following the existing public footpath from Baulk Lane to Northfield Crescent – a distance of approximately 1,300 m. This corridor needs to be significantly wide (c.75m) to create a total green space of 10 ha.</p>	Oppose	<p>Loss of Green Belt and Proposed Green Corridors.</p> <p>The proposed north-south road would cut through the green belt of the fields to the east of the A52. See figure 4.3 page 14. The indicative route of the green corridor more or less follows the route of the road. See map in section 9 figure 9.5 page 41. It is clear that a significant proportion of the surrounding green belt land north of the tram lines will be used for urban/industrial development and/or increase the risk of urban/industrial development in the future.</p> <p>It is also contradictory that a road mostly following the proposed green corridor will then not cause more air pollution with increased noise pollution.</p>
822043	Also Figure 9.5 map	Oppose	
822041	<p>Details about the proposed north-south access road in section 9 where the Toton and Chilwell Forum's vision for the Neighbourhood area includes a vision 'to build a new north-south access primary road to ease traffic congestion before significant further homes are built' .</p>	Oppose	<p>The north-south road through green belt going over the tram lines and beyond is unnecessary because it will add to congestion on the A52, worsen air pollution and hinder achieving Broxtowe’s goal to be carbon neutral by the end of this decade and be a waste of many millions of pounds of public money.</p>
822014	All of it! Unnecessary and too much negative impact on the environment.	Oppose	<p>UN NECESSARY!</p> <p>NO CARE FOR THE ENVIRONMENT OR WILDLIFE</p> <p>Oppose building an unnecessary road now hs2 station has been cancelled. The road is being built through a piece of green belt which I walk through regularly and enjoy the rural nature of the area. The money would be better spent on improving cycling infrastructure. Building this road is against the net zero aims of the council.</p>
821986	Building the link road from stspelford lane to a52	Oppose	

	POLICY ENV03. a) A north-south corridor following the existing public footpath from Baulk Lane to Northfield Crescent – a distance of approximately 1,300 m. This corridor needs to be significantly wide (c.75m) to create a total green space of 10 ha.	
821985	Also Figure 9.5 map	Oppose
	LHC06 A new Leisure Centre should be built in the Area to cope with demand for leisure services arising from increased residential population as well as the significant numbers expected to be working at the Innovation Campus. and Section 9.6 page 40, also Map of	
821983	Development Zones see section 10 page 46.	Oppose
	Details about the proposed north-south access road in section 9 where the Toton and Chilwell Forum's vision for the Neighbourhood area includes a vision 'to build a new north-south access primary road to ease traffic congestion before significant further	
821982	homes are built' .	Oppose
821981	north south access road in section 9	Oppose

Loss of Green Belt and Proposed Green Corridors.

The proposed north-south road would cut through the green belt of the fields to the east of the A52. The indicative route of the green corridor more or less follows the route of the road. See map in section 9 figure 9.5 page 41. It is clear that a significant proportion of the surrounding green belt land north of the tram lines will be used for urban/industrial development and/or increase the risk of urban/industrial development in the future.

It is also contradictory that a road mostly following the proposed green corridor will then not cause more air pollution with increased noise pollution.

Broxtowe Borough Council seem thoroughly determined to destroy all existing Greenbelt in their quest to increase Broxtowe's population by at least 20% without building any additional facilities whatsoever, except a new Bramcote College which when built will not be anywhere near big enough to cope with the number of additional students . No Doctors, Dentists, Leisure facilities, poorly funded town centres and yet they aim to become Carbon neutral in the near future. Plans are already afoot to build both sides of Coventry Lane and Field Farm has already gone. Soon the only Green space to breathe in will be a few well maintained parks, the rest one big huge housing estate. Object to the aspiration for the south Broxtowe leisure centre to be anywhere other than Bramcote and consider the transport considerations to be fanciful.

On page 81 the plan states 'There are no leisure centre facilities within the Area'. Perhaps technically true but the Plan does not show that there is already a leisure centre called the Chilwell Olympia (see <https://www.lleisure.co.uk/sport-and-fitness/chilwell-olympia/>) which is a 12 minute walk away from the Toton and Chilwell Plan boundary. The Chilwell Olympia Leisure Centre is also situated on a current bus route between Beeston in the east and Long Eaton in the West running alongside the south boundary edge. So it does not make sense to have another leisure centre less than 2 miles away from the Chilwell Olympia Leisure Centre. Relocating the Bramcote Leisure Centre would severely disadvantage residents in Bramcote, Stapleford East and Trowell, who would have to travel a significant distance, probably by car, to the proposed leisure centre rather than walk to the current leisure centre in Bramcote.

The north-south road through green belt going over the tram lines and beyond is totally unnecessary because not only will it add to congestion on the A52, worsen air pollution it will also hinder Broxtowe's achieving its goal to be carbon neutral by the end of this decade. A waste of many millions of pounds of public money which could be used to actually improve Broxtowe. Unnecessary, would add to congestion, make air quality poorer, waste of public money.

POLICY ENV03.  
 a) A north-south corridor following the existing public footpath from Baulk Lane to Northfield Crescent – a distance of approximately 1,300 m. This corridor needs to be significantly wide (c.75m) to create a total green space of 10 ha. Oppose

vision 'to build a new north-south access primary road to ease traffic congestion before significant further homes are built' . Oppose

vision 'to build a new north-south access primary road to ease traffic congestion before significant further homes are built' . Oppose

I completely disagree with making a new road extending A52 to Chilwell directly. This will lead to the loss of a scenic dog walking route, cycle and walking route for local people and families not to mention also the loss of habitat for butterflies and bees and other local Wildlife. The area is one of the best areas in Nottingham and it appears you want to reduce the natural aspect for more road which we honestly don't need. HS2 has cancelled. There is no need for it. Oppose

Loss of Green Belt and Proposed Green Corridors.

The proposed north-south road would cut through the green belt of the fields to the east of the A52. See figure 4.3 page 14. The indicative route of the green corridor more or less follows the route of the road. See map in section 9 figure 9.5 page 41. It is clear that a significant proportion of the surrounding green belt land north of the tram lines will be used for urban/industrial development and/or increase the risk of urban/industrial development in the future.

It is also contradictory that a road mostly following the proposed green corridor will then not cause more air pollution with increased noise pollution.

The north-south road through green belt going over the tram lines and beyond is unnecessary because it will add to congestion on the A52, worsen air pollution and hinder achieving Broxtowe's goal to be carbon neutral by the end of this decade and be a waste of many millions of pounds of public money.

The A52 and Toton Lane are more than adequate. If it is felt that the Bardhills' Roundabout suffers congestion from traffic turning onto Toton Lane then an alternative would be to relieve pressure on the roundabout by the creation of a route through, over or under the roundabout of have a left turning lane but by purchasing some of Bardhills Car Park. FAR preferable than the destruction of greenbelt land

The north-south road through green belt going over the tram lines and beyond is unnecessary because it will add to congestion on the A52, worsen air pollution and hinder achieving Broxtowe's goal to be carbon neutral by the end of this decade and be a waste of many millions of pounds of public money. The current dual carriageway and access to Toton Lane are perfectly adequate. If it is felt that the new road would relieve pressure on the Bardhills Roundabout then a better, less environmentally impacting solution would be a lane through/over/under the current roundabout in a similar way to that at the Sherwin arms roundabout

See above. Main issue is loss of scenic dog walks, family walks and safe haven for bees and butterflies and other wildlife. Local areas like this reduce mental stress. We need no further roads



	9.18; "As such, while an east-west road link through the site is supported in principle (for public transport) the intention is for the route to be less direct to discourage use as a cut through, while still improving access and permeability."	Support with modifications
821971	I object to the new road proposal linking the A52 to Chetwynd, this is green belt land and should not be subject to any building proposals.	Oppose
821970	Page 38, Fig 9.3. The proposed north-south access road in section 9 where the Toton and Chilwell Forum's vision for the Neighbourhood area includes a vision 'to build a new north-south access primary road to ease traffic congestion before significant further homes are built'.	Support with modifications
821969	POLICY ENV03. a) A north-south corridor following the existing public footpath from Baulk Lane to Northfield Crescent – a distance of approximately 1,300 m. This corridor needs to be significantly wide (c.75m) to create a total green space of 10 ha.	
821968	Also Figure 9.5 map	Oppose
821966	Details about the proposed north-south access road in section 9 where the Toton and Chilwell Forum's vision for the Neighbourhood area includes a vision 'to build a new north-south access primary road to ease traffic congestion before significant further homes are built'.	Oppose

The link east-west through the barracks has been needed for many reasons for many years. This limited access will only retain the current local irritations for east-west movement but also goes against the opening gambit in the plan that this direction of movement is necessary. Limiting access is doesn't make sense.

Most of the routes on the barracks suggested are already roads that would require upgrading rather than loss of green space. The extension out to the A52 is mostly existing road out of barracks towards the A52.

I'd like to see less houses and more green space saved though.

Loss of Green Belt and Proposed Green Corridors.

The proposed north-south road would cut through the green belt of the fields to the east of the A52. See figure 4.3 page 14. The indicative route of the green corridor more or less follows the route of the road. See map in section 9 figure 9.5 page 41. It is clear that a significant proportion of the surrounding green belt land north of the tram lines will be used for urban/industrial development and/or increase the risk of urban/industrial development in the future.

It is also contradictory that a road mostly following the proposed green corridor will then not cause more air pollution with increased noise pollution.

The north-south road through green belt going over the tram lines and beyond is unnecessary because it will add to congestion on the A52, worsen air pollution and hinder achieving Broxtowe's goal to be carbon neutral by the end of this decade and be a waste of many millions of pounds of public money.

POLICY ENV03.  
a) A north-south corridor following the existing public footpath from Baulk Lane to Northfield Crescent – a distance of approximately 1,300 m. This corridor needs to be significantly wide (c.75m) to create a total green space of 10 ha.

821967 Also Figure 9.5 map Oppose

POLICY ENV03.  
a) A north-south corridor following the existing public footpath from Baulk Lane to Northfield Crescent – a distance of approximately 1,300 m. This corridor needs to be significantly wide (c.75m) to create a total green space of 10 ha.

821964 Also Figure 9.5 map Oppose

Details about the proposed north-south access road in section 9 where the Toton and Chilwell Forum's vision for the Neighbourhood area includes a plan 'to build a new north-south access primary road to ease traffic congestion before significant further homes are built' .

821962 Oppose

Link road and development of open space off A52 between Bardills and Sherwin islands

821963 Oppose

The proposed access road in section 9, designed to ease congestion before new homes are built

821960 Oppose

Loss of Green Belt and Proposed Green Corridors.

The proposed north-south road would cut through the green belt of the fields to the east of the A52. See figure 4.3 page 14. The indicative route of the green corridor more or less follows the route of the road. See map in section 9 figure 9.5 page 41. It is clear that a significant proportion of the surrounding green belt land north of the tram lines will be used for urban/industrial development and/or increase the risk of urban/industrial development in the future.

It is also contradictory that a road mostly following the proposed green corridor will then not cause more air pollution with increased noise pollution.

Loss of Green Belt and Proposed Green Corridors.

The proposed north-south road would cut through the green belt of the fields to the east of the A52. See figure 4.3 page 14. The indicative route of the green corridor more or less follows the route of the road. See map in section 9 figure 9.5 page 41. It is clear that a significant proportion of the surrounding green belt land north of the tram lines will be used for urban/industrial development and/or increase the risk of urban/industrial development in the future.

It is also contradictory that a road mostly following the proposed green corridor will then not cause more air pollution with increased noise pollution.

The north-south road through green belt going over the tram lines and beyond is unnecessary because it will add to congestion on the A52, worsen air pollution and hinder achieving Broxtowe's goal to be carbon neutral by the end of this decade and be a waste of many millions of pounds of public money. Now the HS2 Hub station will not be built at Toton Sidings (even though an ordinary station may be built) the main rationale for this road seems to have disappeared.

The A52 is already a nightmare to try to navigate at key periods. The Bardills junction in particular grinds to a halt due to sheer volumes of vehicles, even when the road network is fully open. The open spaces proposed for development are the green belt between Bramcote village where i live and Stapleford. Bramcote will lose its village character completely with its enclosure. These pathways are used frequently by our household and if we were walking residential streets and not country paths we would be forced to use our cars to access these sorts of walks. Surely there are sufficient brown fields sites for development in the area with the Chetwynd site and the Bramcote School for instance.

This road is not needed. It is a huge waste of public money. The road will add to congestion on the A52. It will increase air pollution. Broxtowe's aim to be carbon neutral by 2030 is compromised by the building of this superfluous road. There should be a focus on using existing transport routes and creating cycle ways and footpaths to link new housing developments with the tram network. The creation of a new road will inevitably lead to development along that route, in an area which is currently valued as a rare, open, green space with far reaching views. Broxtowe Council should be protecting these special local sites not spending money on building new roads across them.

Details about the proposed north-south access road in section 9 where the Toton and Chilwell Forum's vision for the Neighbourhood area includes a vision 'to build a new north-south access primary road to ease traffic congestion before significant further homes are built' .

821958 Oppose

821956 The 1 mile road from the A52 to Chetwynd. Oppose

821955 North-south road Oppose

POLICY ENV03.  
a) A north-south ROAD TRAFFIC corridor following the existing public footpath from Baulk Lane to Northfield Crescent – a distance of approximately 1,300 m. This corridor needs to be significantly wide (c.75m) to create a total green space of 10 ha.  
Also Figure 9.5 map

821953 Oppose

The north-south road through green belt going over the tram lines and beyond is unnecessary because it will add to congestion on the A52, worsen air pollution and hinder achieving Broxtowe's goal to be carbon neutral by the end of this decade and be a waste of many millions of pounds of public money.

I oppose the road as:

- it will cause unnecessary delay and congestion to an already busy road.
- The cost of building a 1 mile road at £40million pounds, through our green belt land, could be better spent else where, rather than running a road parallel to and running in the same direction as an already existing road.
- While there are wafty comments about job opportunities, there have been no actual mention of what or where these job opportunities will be.
- The land is green belt. We have a responsibility to protect such land for our local wildlife. Green 'corridors' for wildlife are ever decreasing because of the human impact on the land. Is this road really necessary not only from the financial cost but the cost to our local wildlife and areas of natural beauty?

The north-south road through green belt going over the tram lines and beyond is unnecessary because it will add to congestion on the A52, worsen air pollution and hinder achieving Broxtowe's goal to be carbon neutral by the end of this decade and be a waste of many millions of pounds of public money.

#### Loss of Green Belt and Proposed Green Corridors

The proposed north-south road would cut through the green belt of the fields to the east of the A52. See figure 4.3 page 14. The indicative route of the green corridor more or less follows the route of the road. See map in section 9 figure 9.5 page 41. It is clear that a significant proportion of the surrounding green belt land north of the tram lines will have its ability to serve the five functions of green belt severely compromised and open up the possibility that the land could be taken out of the green belt in the foreseeable future. It is also contradictory that a road mostly following the proposed green corridor will then not cause more air pollution with increased noise pollution.

The proposed new ROAD flies in the face of the council ambition to zero carbon by 2028.

ASPIRATION: 02 Develop Specialist MMC	
821952 Capabilities (p49)	Support with modifications
The aspiration in LHC06 that a new Leisure Centre should be built in the Area supposedly to cope with demand for leisure services arising from increased residential population as well as the significant numbers expected to be working at the Innovation Campus. and Section 9.6 page 40, also Map of Development Zones see section 10 page 46. Specifically the aspiration that this should be the Broxtowe Borough Council south Broxtowe leisure centre.	
821951	Oppose
The proposed north-south access road in section 9 where the Toton and Chilwell Forum's vision for their area includes 'to build a new north-south access primary road to ease traffic congestion before significant further homes are built' (sic).	
821950	Oppose

Involve the expertise from Nottingham University to take advantage of their excellence in this subject and to promote better building implementation.

Design for zero carbon or even net positive energy, from the outset.

Motivation: We really need to move forwards and away from the present "minimum build" shoddiness that is expensive for the home owners, and detrimental to their well being and the environment.

Can this be made a Guideline for this area?

I would be grateful for the chance to present my concerns to the independent examiner in person if there is to be a public examination.

Thank you,

The existing leisure in Bramcote is both very well used and a surplus generator. The Local Plan and the emerging neighbourhood plan for Broxtowe make it clear the preferred location for a replacement leisure centre is on or the vicinity of the existing leisure centre.

The location in Chetwynd is not accessible to large swathes of Broxtowe and even the Chetwynd forum recognise this by alluding to NEW bus services - with no hope or expectation that these will ever see the light of day. Chetwynd's aspiration will add yet more traffic and deter people from getting much needed exercise.

The north-south road through green belt. Going over the tram lines and beyond is unnecessary because it will add to congestion on the A52, worsen air pollution and hinder achieving Broxtowe's goal to be carbon neutral by the end of this decade and be a waste of many millions of pounds of public money.

Constructing a new junction on the A52 between the Sherwin and Bardill's islands will slow traffic and add to congestion on one of the main arterial routes into Nottingham and passing through Bramcote.

It will weaken the integrity of the green belt and its ability to serve its five functions.



I feel the following questions are not covered or answered. Indeed, my impression is that the values this table shows, go against all the public consultation results:

Is such a reduction of open space and green space per population healthy?

Is the reduction acceptable to the existing population?

Is such a significant reduction in the open space per population necessary and justified?

... Especially so when the anticipation is for that space to fall (per population) to below that of Nottingham City?

The numbers in the table indicate the removal of a significant and an important part of the existing landscape and the denuding of the beneficial ambience of this area, that are directly and indirectly enjoyed by the population of this area.

I would be grateful for the chance to present my concerns to the independent examiner in person if there is to be a public examination.

Thank you,

821948 Table 13.1 (p63)

Oppose

Fig 6.2 (p27)  
Fig 9.3 (p38)  
Fig 14.1 (p67) and associated sections

821945

Have Comments

821943 All of it

Oppose

regarding an access road through the Cretwynd development:

Is this not an ideal opportunity to design for better traffic flows and for a better environment rather than creating more of a noisy polluting frustrating traffic jam?

We have the reality of continued commute traffic crossing this area. Can a more holistic approach be considered?

For example, to improve the commute route that is used from Bardells Roundabout across to Bye Pass Road, can a solution be considered of connecting from the existing Toton Park and Ride through to the north-south section of Swiney Way, and with improvement at Ranson Road?

Note that a large part of Swiney Way is already semi-industrial and is walled off from residential buildings.

Thus we have the opportunity to alleviate commute traffic from the central junction of Toton.

Further:

Include sections of (partial) cut-and-cover so that we have safe uninterrupted green pedestrian access over sections of the new road;

Similarly, consider cut-and-cover for the road so as to unobtrusively pass the NET tram and cycle and pedestrian routes over Toton Lane;

Make the Toton Park and Ride a usefully attractive alternative to commuting by car, for traffic from the A52 and also for traffic from the direction of Long Eaton.

Absolutely unnecessary given existing infrastructure. There are far more valuable improvements that could be achieved with this money rather than just duplicating what's already there.

POLICY ENV03.  
a) A north-south corridor following the existing public footpath from Baulk Lane to Northfield Crescent – a distance of approximately 1,300 m. This corridor needs to be significantly wide (c.75m) to create a total green space of 10 ha.  
821935 Also Figure 9.5 map Oppose

LHC06 A new Leisure Centre should be built in the Area to cope with demand for leisure services arising from increased residential population as well as the significant numbers expected to be working at the Innovation Campus.  
and Section 9.6 page 40, also Map of  
821934 Development Zones see section 10 page 46. Oppose

Loss of Green Belt and Proposed Green Corridors.

The proposed north-south road would cut through the green belt of the fields to the east of the A52. See figure 4.3 page 14. The indicative route of the green corridor more or less follows the route of the road. See map in section 9 figure 9.5 page 41. It is clear that a significant proportion of the surrounding green belt land north of the tram lines will be used for urban/industrial development and/or increase the risk of urban/industrial development in the future.

It is also contradictory that a road mostly following the proposed green corridor will then not cause more air pollution with increased noise pollution.

I would be grateful for the chance to present my concerns to the independent examiner in person if there is to be a public examination.

Thank you,

Object to the aspiration for the south Broxtowe leisure centre to be anywhere other than Bramcote and consider the transport considerations to be fanciful.

On page 81 the plan states 'There are no leisure centre facilities within the Area'. Perhaps technically true but the Plan does not show that there is already a leisure centre called the Chilwell Olympia (see <https://www.lleisure.co.uk/sport-and-fitness/chilwell-olympia/>) which is a 12 minute walk away from the Toton and Chilwell Plan boundary. The Chilwell Olympia Leisure Centre is also situated on a current bus route between Beeston in the east and Long Eaton in the West running alongside the south boundary edge. So it does not make sense to have another leisure centre less than 2 miles away from the Chilwell Olympia Leisure Centre. Relocating the Bramcote Leisure Centre would severely disadvantage residents in Bramcote, Stapleford East and Trowell, who would have to travel a significant distance, probably by car, to the proposed leisure centre rather than walk to the current leisure centre in Bramcote.

I would be grateful for the chance to present my concerns to the independent examiner in person if there is to be a public examination.

Thank you,

			my reasons strongly opposing the indicated North-South Access Road:
			<ul style="list-style-type: none"> <li>• The road south through green belt, and over/across the tram lines and beyond is unnecessary</li> <li>• It will add to congestion and cause additional traffic delays on the A52</li> <li>• It will add noise pollution to areas previously unspoilt by such traffic noise</li> <li>• It is unnecessarily circuitous and crosses significant green open space/green belt</li> <li>• It is unnecessarily costly in adding an entirely new junction</li> <li>• It unnecessarily parallels/duplicates the existing Toton Lane</li> <li>• The severing of Toton Lane that is to be replaced by the proposed Access Road severs an important historical direct central route between Toton and Stapleford, and also restricts access to the existing school buildings on Toton Lane from south of the A52</li> <li>• It restricts access to the Toton NET park and ride from the south(!)</li> <li>• The present Toton Lane is a critical connection for north-south traffic for that area</li> <li>• Present commute and school run traffic will be adversely disrupted</li> <li>• The road fails to add essential east-west capacity for the new developments or to accommodate the inevitable east-west commute traffic</li> <li>• It is poor/inefficient utilization of valuable land area</li> <li>• The route proposed follows a significant natural sight-line across the landscape that will be highly prominent and unsightly</li> <li>• It reduces the viability of the existing working farmland there</li> <li>• It threatens to make the existing working farmland there unviable</li> <li>• It will promote development across the remaining historical and locally significant open space in the area to threaten forming a metropolis</li> <li>• 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</li> <li>• It will worsen air pollution</li> <li>• It hinders achieving Broxtowe's goal to be carbon neutral by the end of this decade</li> <li>• It is an unnecessary waste of many millions of public money.</li> </ul>
	The North-South Access Road:		
	Section 9 (page 35) the Toton and Chilwell Forum's vision, map Figure 9.3 page 38, section 10.17, page 48.		
821895		Oppose	
			<p>I support the principle of conservation and re-purposing to ensure the unique heritage of Chetwynd Barracks/COD Chilwell/No. 6 National Shell Filling Factory can be preserved to become the centre piece around which the new community can be built. This will create a sense of place which exists no where else.</p> <p>Re-purposing buildings also ensures that embodied CO2 is not lost through demolition. The environmental impact of any development should be to the fore when considering any planning proposals.</p> <p>The north-south relief road will further marginalise the Toton Tram Stop which was a c£500 million investment to take people out of car and onto public transport. Any road north out of Chetwynd Barracks should terminate at the tram stop and not seek to make car transport more attractive. The relief road will not serve improved access to/from the M1 junction.</p>
821537	LHC02	Support	
	INF02 - North-South Access Road		
821515		Oppose	
821238	New Road	Oppose	More pollution, more cars, environmentally disastrous.



LHC06 A new Leisure Centre should be built in the Area to cope with demand for leisure services arising from increased residential population as well as the significant numbers expected to be working at the Innovation Campus.  
and Section 9.6 page 40, also Map of  
821197 Development Zones see section 10 page 46.      Oppose

#### POLICY ENV03.

a) A north-south corridor following the existing public footpath from Baulk Lane to Northfield Crescent – a distance of approximately 1,300 m. This corridor needs to be significantly wide (c.75m) to create a total green space of 10 ha.  
821196 Also Figure 9.5 map      Oppose

Details about the proposed north-south access road in section 9 where the Toton and Chilwell Forum's vision for the Neighbourhood area includes a vision 'to build a new north-south access primary road to ease traffic congestion  
821193 before significant further homes are built' .      Oppose

New road, new road junction on A52 and  
821192 resisting of leisure centre      Oppose

Object to the aspiration for the south Broxtowe leisure centre to be anywhere other than Bramcote and consider the transport considerations to be fanciful.

On page 81 the plan states 'There are no leisure centre facilities within the Area'. Perhaps technically true but the Plan does not show that there is already a leisure centre called the Chilwell Olympia (see <https://www.leisure.co.uk/sport-and-fitness/chilwell-olympia/>) which is a 12 minute walk away from the Toton and Chilwell Plan boundary. The Chilwell Olympia Leisure Centre is also situated on a current bus route between Beeston in the east and Long Eaton in the West running alongside the south boundary edge. So it does not make sense to have another leisure centre less than 2 miles away from the Chilwell Olympia Leisure Centre. Relocating the Bramcote Leisure Centre would severely disadvantage residents in Bramcote, Stapleford East and Trowell, who would have to travel a significant distance, probably by car, to the proposed leisure centre rather than walk to the current leisure centre in Bramcote.

#### Loss of Green Belt and Proposed Green Corridors

The proposed north-south road would cut through the green belt of the fields to the east of the A52. See figure 4.3 page 14. The indicative route of the green corridor more or less follows the route of the road. See map in section 9 figure 9.5 page 41. It is clear that a significant proportion of the surrounding green belt land north of the tram lines will be used for urban/industrial development and/or increase the risk of urban/industrial development in the future.  
It is also contradictory that a road mostly following the proposed green corridor will then not cause more air pollution with increased noise pollution.

The north-south road through green belt going over the tram lines and beyond is unnecessary because it will add to congestion on the A52, worsen air pollution and hinder achieving Broxtowe's goal to be carbon neutral by the end of this decade and be a waste of many millions of pounds of public money.

The proposal is for a large sum of money to be spent on road/junction which would only bring detriment to the area and no benefit. We should be discouraging car use, not building new roads and junctions which would lead to a build up of traffic and increase pollution.  
Transport proposals to a new leisure centre are unrealistic, putting more traffic onto roads. Maintaining the site of the current Bramcote leisure centre is of greater benefit, to a rapidly growing population that is local to the site.

New Junction on A52 between Sherwin Island  
821172 and the Bardills island. Oppose

Another junction in this area would bring untold congestion in an already very busy area. Traffic is already terrible whenever there are issues in the surrounding area.

Air pollution is getting worse and another road would attract more roads users, increasing pollution further. There are schools on all corners of the area, so worsening air quality will impact on the younger members of our communities.

Finally, there seems absolutely no point in a road here. It will not save time, but will impact the lives of all those who use the footpaths in the area.

slip road from A52 into the new development

the new road leading off the A 52 crosses the tram lines. as the trams take priority, there is potential for traffic to be backed up waiting for tram(s) to pass. at busy times. traffic could be backed up to the A52 creating incidents where people wish to enter the road but are unable to do so. this increases noise. pollution and could be extremely dangerous due to the fast traffic on the A 52

821133 new leisure centre in totton Oppose

secondly, would a leisure centre at totton be at the expense of rebuilding the centre at bramcote. if so i strongly object. bramcote has been promised a new leisure centre for many years.

820175 A52 new junction Oppose

Increase traffic problems already at this junction. Ravage Green fields and trees loss of leisure facilities walking etc.

Creation of a road/junction between Sherwin  
820147 Island and Bardill Island on the A52. Have Comments

I agree with the Neighbourhood Forum in opposing the plan for this new road.

The road will run through green belt land, ruining a natural space which is used for leisure, exercise and wildlife.

Congestion on the A52 will be made worse as this road just moves a problem further along.

Since the original plans, more people are working from home so there is less need for commuting. People should be being encouraged to take public transport rather than take their cars. With that in mind, there should be better links from Chetwynd to tram points for a journey to Nottingham City Centre.

Section 9.3 "Also, our vision is to build a new  
north-south access  
primary road to ease traffic congestion before  
significant further homes are built (see Figure  
819933 9.3)" Oppose

The proposed road would cut through green belt and leave adjoining green belt vulnerable to further development. There is no need to use green belt land for housing. It would cause further congestion on an already congested section of the A52 with consequent degradation of air quality.

819922 Section 9.6. Relocation of Leisure Centre. Oppose

Will reduce accessibility.

Section 9.3 : "build a new north-south access  
819906 primary road" Oppose

Increases congestion on A52, which is already overloaded at peak times.

Degrade the green belt through which it passes.

Developing green belt land to build a new road running parallel to an existing road, to join areas that already have excellent transport links is completely unnecessary and will have dramatic negative impacts on the local area through desimating local wildlife habitats and removing well used/loved green space used by residents of chilwell, bramcote and stapleford. Air pollution will increase as will noise pollution from cars. This will not "level up" the local area as the transport links being proposed already exist through existing roads.

Development of green belt land next to a52  
819756 leading to tram tracks (near bardills) Oppose

			<p>I am concerned that the aspirations appear to involve relocating existing leisure centre facilities from Bramcote to Toton/Chilwell. This will only deprive the areas that the current facilities serve to Bramcote and Wollaton. Additional leisure facilities should be provided to serve Toton and Chilwell, not to the detriment of existing services provided elsewhere.</p> <p>The plans should avoid destruction/loss of any existing green field land and worsening of existing congestion or accidents on the A52. However, I would support any changes that look to reduce vehicle speed and accidents on the stretch of the A52 between Sherwin Island and Bardills Island.</p>
819712	Aspiration	Support with modifications	
	Loss to green belt which will cause a precedent and further loss in near future. If HS2 not coming to Toton the need is not obvious		
819670	balancing cost with the perceive benefit.		
819659	The plan as a whole	Support	
	EMP04		
819531		Support	<p>Despite the continuing uncertainty of the former Hs2 site. I would like the inclusion of opportunities to a develop highly skilled local work force through the development centres of excellence. I think moving away from mid 20th century building practices and developing more stainable cheaper housing would ensure economic stability in our locality. I would like their to be a focus on developing skills through apprenticeships rather than university based projects which for many are inaccessible</p>
818765	Figure 14.1	Have Comments	<p>I live on [REDACTED] and commute to Derby for work. I currently have to drive through Bramcote (devil's bend) to get out to the A52. I think it's a missed opportunity not to I have a road open to all vehicles from field lane (compared to a bus gate) so that you could access the A52 quickly.</p> <p>A well thought out plan for the future of the Area. It provides a clear vision plus a framework, policies, aspirations and guidelines that will shape the future of Toton and Chilwell for years to come. This will be important for current and new residents, plus of course future generations living and working in the Area.</p>
818759	The entire Neighbourhood Plan	Support	<p>I am in support of the Neighbourhood Plan, as it provides the framework, policies, aspirations and guidelines that will shape the future of Toton and Chilwell for many years to come. It provides a clear vision for the future of the Area for current &amp; new residents, and future generations. The Plan addresses local concerns &amp; includes a plaza close to the WW1 memorial &amp; 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 &amp; healthcare needs are included within the plan.</p>
818758	The whole Neighbourhood Plan	Support	

I just want to express my support for the plan  
818754 as a whole Support

over all Master Plan with each policy  
researched, gone over many times, to benefit  
817846 the community in it's diversity. Support

817841 Whole Support

817836 All parts. Support

Toton, the road infrastructure and green  
817830 spaces. Support

I have every confidence in the Forum who have drawn up the plan. When this whole process started there was huge support within the Toton area for the aims and objectives of the group. In the years since it has felt as though Broxtowe Council have deliberately dragged their feet and got the whole process bogged down in an administrative nightmare in the hope that the local group would disappear. Thankfully they haven't. We need a joined up, sustainable approach to developments in the area rather than the piecemeal approach that we have seen in the past and I think the Neighbourhood Plan provides a sound framework for Toton and the surrounding area into the future.

I have been connected with Toton and the area for over 25 yrs. and now living in Chiwell Meadows. I was involved with the forum from the start and even though a lot has happened in the past 5 years I continue to for-see the opportunities for the Master Plan as advantageous to all walks of life in education, employment, business, housing, well being nature and social history past and present and how the Master Plan will benefit young and old for many generations to come. Having a town centre has long been a dream to bring the community together in this fast passing world we live in. The Neighbourhood Plan contains many necessary policies to ensure the Area provide exemplar sustainable developments which will increase biodiversity and provide greenspace for the community. I am extremely disappointed that the Borough Council have delayed Regulation 16 activities for over two years and are using their tardiness as a reason to raise objections which would not have been valid had they consulted in a timely manner.

As a local resident, I support the work, conclusions and presentations of the CTTC Forum and the Neighbourhood Plan that they have submitted for consideration.

The new North South road linking the A52 to ease the burden of traffic through Toton is essential. The new leisure complex, green spaces, and community properties (schools, health care etc.) are essential for supporting Health and well Being. I have reservations that the number of eventual dwellings are still too high for the proposed infrastructure.



representation has previously been made to the forum regarding the neighbourhood plan, specifically on the opportunity that is missed to invest in existing facilities and space at Chilwell School.

The loss of HS2 means that the main driver for relocating George Spencer has been lost whereas the current plans for a rebuild of Chilwell School on 40 acres of land means that the opportunity to invest in school places as well as redevelop an existing leisure facility should be explored.

Email exchange with [REDACTED] from CTCNF in April 2022 below;

Dear [REDACTED]

Thank you for your response. I appreciate that the HS2 proposal had significant impact on the plans submitted, but with the abandonment of that aspect, it is worth reconsidering the options moving forward.

I also need to clarify that there are no proposals that the governing body at Chilwell are considering regarding a merger with George Spencer, nor would any currently be considered. However, as a foundation school, the governing body at Chilwell also own the land on which the school sits and are able to amend the admission numbers. You may also need to be aware that we have a bid in with the DfE for a full rebuild of the school and I have long argued that we need to consider the option that the new build is planned and constructed for a possible future expansion to ensure that all students in the local area have a secondary place.

I am happy to discuss all of these issues further with you if you wish.

817826 LHC04 LHC06

Support with modifications

On Mon, 25 Apr 2022 at 17:53, Assist CTCNF [REDACTED] wrote:

Hi [REDACTED],

Oppose in as much as I wish to express disappointment at what will be lost . Given the increasing trend to working at home , and no doubt you will ensure excellent IT infrastructure in your new builds , and the necessity for better public transport do you really think there will be enough extra traffic to justify a new road from the A52 through what is now lovely relaxing country side in any way desirable . None of your projected green corridors will make up for this loss of a wide area of country side .

Are you going to protect the excellent butterfly habitat at Toton Sidings ? I can't tell from the provided maps . There is a population of Green Hairstreaks and of Marbled Whites which it would be a great shame to lose .

Having had my wings I would like to express my admiration for the amount of work put into these documents . I just hope we don't lose what we have now .

I suspect aspiration but the documents are so numerous and long I really can no longer remember! I am concerned about the impact

817044 on the environment locally .

Oppose

14. INFRASTRUCTURE/GETTING AROUND POLICY INF02.			Relieving traffic on Stapleford Lane is important, this has become a very busy road in recent years with almost continuous traffic and has the effect of splitting Toton in half. Not the best situation, given that the lane is a walking route for hundreds of school children going to and from George Spencer academy. Turning right onto Stapleford Lane from roads to the east (Katherine Drive and Petworth Ave) is difficult.
809797	Chetwynd Barracks and SLG.	Support	A new north to south road should relieve the situation so I am supportive.
17. LEISURE, HERITAGE AND COMMUNITY			Encouraging the population to be healthy is so important that it hardly needs saying. A leisure centre in Toton is an absolute must - I strongly supports this. Centre should include a swimming pool. Toton has hardly any leisure facilities and this will give families a much needed outlet, my teenagers both complain that there is 'nothing to do' in Toton. I am also supportive of a facility for a park run, excellent idea as well.
809793	LHC06 A new Leisure Centre should be built in the Area	Support	I am supportive of the neighbourhood plan, though I object to the aspect as described below.
14. INFRASTRUCTURE/GETTING AROUND POLICY INF03 and INF04			Figure 14.2 shows a proposed cycling route (orange dotted line) between Stapleford Lane and the proposed East Midlands rail hub (presumably now just a regional station as HS2 has been scaled back) through the middle of the housing estate at west Toton. The route works its way through the entirety of Woodstock Road, through part of Seaburn Road, through the entirety of Cleveleys Road, through part of Whitburn Road and through the entirety of Epsom Road to the roundabout at the top of Banks Road then down the embankment to the railway sidings.
809792			The route through the estate is already served by pavements and is a well-known walking route. However, I think this is not suitable for a designated cycling route for the following reasons. 1/ Epsom Road is quite a narrow road and is almost always congested by parked cars of residents. 2/ The pavements on Epsom Road are also relatively narrow, so if bikes were allowed on the pavements this would risk collision with pedestrians. Additional risk is posed by the fact the path is well used by school children, and guardians for younger children, making their journeys to and from Bispham Drive and George Spencer schools. 3/All of the houses on Epsom roads have drives that back onto the road over the path, some drives have limited visibility onto the road making fast moving cycles a risk of collision. 4/Epsom Road is currently blocked off at its middle with bollards to prevent through traffic. Either side of the bollards there are car turning points which will cause confusion if a bike lane is introduced. Cyclists do use the road though these tend to be slow moving, probably taking into the risks associated with a congested residential road. However, designating this as a cycling route will almost give cyclist a green light to speed up and increase of accidents accordingly. Accidents do happen - my wife was recently struck by a cyclist speeding along the bridle path on the ridge beside Toton sidings. 5/The proposed cycle track take in a 'chicane' with the short Cleveleys Road, wedged between Whitburn and Seaburn Roads, traffic coming down the latter can be fast moving and would pose a collision risk with cyclists, particularly with the limited visibility at the corners. 6/ Existing routes to the south and north, of the housing estate serve the same purpose of access and would be better suited to the development of a cycling paths, these existing routes largely work

	<p>1. Their desire to relocate Bramcote Leisure Centre to Toton</p> <p>2. The proposed one mile link road estimated at a minimum of £40m that will no doubt open up future building on precious green belt in the Chilwell/Bramcote area.</p>		
	The document is very lengthy and I was unable to locate the particular section but this was outlined to members of the Bramcote		
807352	Neighbourhood Forum at a recent meeting.	Oppose	<p>1. Their aspiration was drawn up when they were anticipating the HS2 hub being based at Toton, This is no longer the case.</p> <p>2. The current Bramcote location for a leisure centre is a popular one and there is no public transport from Bramcote to Toton.</p> <p>3. £40m is an obscene amount of money to spend on a single carriage road, particularly one that won't solve traffic congestion at an already busy Bramcote island. Their emphasis should be on encouraging eco friendly travel by tram into Nottingham.</p>
805829	All	Support	<p>I think the Chetwynd: The Toton and Chilwell Neighbourhood Plan is a well thought through and inspirational plan for the area in which I live and grew up in, and I am in support of the document. The CCTC Forum have consulted and involved the community since 2016 in creating the Neighbourhood Plan, which I fully support.</p> <p>I support the aims and ambitions of the plan. This follows the public consultation process prior to the plans and was shaped by the responses received.</p> <p>The plan is detailed, has been worked on by people who know and love the area. It addresses all areas of life and environmental issues. It provides the area with a centre.</p> <p>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 well being are immense.</p> <p>We need to improve public transport, cycle paths and pedestrian paths BEFORE we start building - these things need to be an integral part of the plan, not an afterthought. The existing bus and tram services are fine, but for many people the bus and tram stops are NOT within walking distance, so we still rely on cars.</p> <p>It is imperative to have many more smaller homes for singles, young families and pensioners wishing to downsize. However "smaller homes" should not mean "inferior homes". They need to be well planned, well laid out and designed with the same care as larger homes, giving access to outside space without total loss of privacy.</p> <p>As someone who has elderly relatives who live [REDACTED] close to the proposed site, I do not feel they have been communicated with effectively about these proposals. They were completely unaware until I, by chance, came across the proposals on social media.</p> <p>I am pleased to see such a comprehensive set of documents which are the output of a number of consultation approaches with those of us living in the neighbourhood plan area. I have personally been able to participate in a few of these and can see evidence of my input in the final documents. I think the plan produced is a great reflection on what the local residents want to see from future developments in our area.</p>
804976	Complete Plan and all supporting documentation	Support	
804841	All	Support	
803906	Whole plan	Support	
	Section B		
803862	The Core Objectives	Support	
803677	The Toton and Chilwell Neighbourhood Plan	Oppose	
798758	All aspects	Support	

796165	SEA. Environmental impact. Negative impact on already abysmal air quality.	Oppose
794491	I support the entire plan.	Support
794024	All	Support
792108	The whole plan.	Support

Your own report states that the reason for the relocation of George Spencer Academy is because "The proximity of the A52 to the school creates existing health hazards for the students due to poor air quality readings". The proposal to move the school, build new roadways and build more housing will not make the air any cleaner, it will instead increase the levels of pollution in the area.

INF02 goes on to state "The construction of a new road would be likely to have a very negative impact upon the SEA issues of Landscape, Human Health and possibly issues relevant to the environment, including Air [quality] and Biodiversity. The Borough Council has recommended that this Policy should be re-worded as an aspiration." There is nothing aspirational about replacing an established wildlife corridor and nature trail with a road. The current traffic load on the A52 is already producing enough pollution to negatively impact the health of local residents and school children. The proposed North-South road will make this negative impact greater. Then factor in the additional traffic from the proposed new homes and the negative impact on health and environment worsens.

The tram network at Toton was built with the intention of removing reliance on cars, focusing instead on the use of public transport. If that is the case then why the need for more roads? Has the tram system failed in its intended purpose?

Residents in the NG9 7JE/JG area seem to be oblivious as to the proposed plans. Why? The A52 runs alongside Westerlands, Clarehaven, Brunswick Drive, Brampton Drive, Darkey Lane and Toton Lane. Increased traffic in the area will negatively impact the lives and the health of these residents, but they appear to have been left out of the discussion. Why?

In summary. Why is the Chetwynd Neighbourhood Plan in direct contradiction of the Nottingham City Council Breathing Space Strategy? And why is the Neighbourhood Plan so self-contradictory in terms of the need to improve air quality and reduce the negative impact of pollution? The plan has been well thought out and has engaged with local people and has listened and proposed on their wishes. I support the work and submissions made by the Chetwynd: The Toton & Chilwell (CTTC) Neighbourhood Forum. Although I am not a resident of the CTTC area I have followed their efforts and progress from the beginning and at times provided direct input with them. The group impress and inspire me. I fully support their aims and ambitions. Broxtowe would do well to accept their plan and offer it as an example to any other area following the same path.



Development of the 'green fringe', ex-green belt area (ref 4.3) and the proposals for an innovation campus, new homes, relocated school etc in this area.

792018 Oppose

791817 All Support

All of the consultation for this plan was undertaken when it was expected that the HS2 hub would be developed on Toton sidings. In that context I was supportive of the forum's action to try to make the best of things. 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. It is highly valued by local residents as nourishing green space for our mental and physical health (evidenced especially during the pandemic.) Local residents in general do not support the development of this area for housing, now that HS2 is not coming to Toton.

This development aspect of the plan should not be taken further.

[REDACTED], and as someone who has responded at each stage of the formulation and consultation, I confirm my support for the Plan.

I strongly object to the use of the Toton and Chilwell green fringe (green belt land) for an innovation campus, new housing, leisure centre and school. This area is a peaceful haven and a cushion between Chilwell and the A52. During the pandemic this has been a godsend 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.

I have heard the arguments that green corridors will be in place, but this is insufficient when it is considered that these corridors will be surrounded by modern, poorly designed housing. As is the general trend the new housing will be closely packed together, with tiny gardens, a lack of parking space and no planting or green spaces or trees plant. It will be a soul crushing desert of uniform boxes. There will be no wider open spaces to fill the soul.....

The addition of too many new houses will end up overloading of the local area and services.

What I don't understand with this plan is why it has to extend beyond just being limited to the renewal/development of the Chetwynd barracks. The barracks is a sufficient space to develop for housing, schools, leisure centres and business. Even the development of this area will be likely to overload the area, which will not be pleasant for the people already living in the area.

General objections to the use of green belt (Toton and Chilwell green fringe) land.

790632 Oppose

This plan is ridiculous and overbearing and needs to be stopped.

Housing development of Chilwell Barracks.  
This needs to have an area at the top by the fields towards the tram dedicated to self build properties like Graven Hill in Oxfordshire, this should be affordable and all properties need to be carbon neutral and a sustainable build utilising green energy such as solar panels and heat ground pumps.

Wildlife corridors throughout the area need to be encouraged and nature reserves designated with Nottinghamshire Wildlife Trust being

790394 brought on board to assist.

Have Comments

My comments above show how a different would benefit the project and the local area.