



**RE: Planning Application 25/00371/OUT Outline Planning Application for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure (With some matters reserved).**

Chetwynd: The Toton and Chilwell Neighbourhood Forum (CTTCNF) is the qualifying body responsible for the preparation of the Chetwynd: The Toton and Chilwell Neighbourhood Plan (CTTCNP). The CTTCNP was adopted 'made' by Broxtowe Borough Council in May 2024, covering the period 2020 to 2040. It therefore forms part of the Development Plan (alongside the Local Plan) for the CTTCNF Area within which this development proposal falls.

We object to some aspects of the proposed development. In particular, this proposal is non-compliant, or not fully compliant, with the following CTTCNP policies:-

ENV01 (1), ENV02, ENV03, INF01, INF02, INF03, HAS01, HAS02, HAS03, HAS04, URB01, URB02, URB03, URB04, URB05, LHC01 (1 & 3), LHC04, LHC05, LHC06, LHC08, EMP01, EMP03

N.B. Where there is insufficient information to determine compliance with a policy, then CTTCNF has assumed non-compliance until such time that further information or evidence becomes available.

CTTCNF has not assessed this proposed development against the Broxtowe Part 2 Local Plan (P2LP) policies, nor against the requirements of the Toton & Chetwynd Strategic Masterplan Supplementary Planning Document (SM-SPD). However, any specific non-compliance has been noted within this covering letter and/or the accompanying spreadsheet.

We do recognise the need for new housing provision, and other development, within the allocated sites of the Toton Strategic Location for Growth (SLG) and Chetwynd Barracks, and recognise some of the positive aspects of this development proposal, but have reservations about a number of the others. Especially those that do not comply with the policy requirements of the CTTCNP. It should be noted that this proposed development includes the Character Area Toton South and part of Toton North (as defined in the SM-SPD and emerging Greater Nottingham Strategic Plan (GNSP)), which is a significant part of the SLG, and as such is required to contribute to the employment requirements of the Part 2 Local Plan Policy 3.2, SM-SPD and emerging GNSP.

Whilst the Eastern leg of HS2 was cancelled by the Integrated Rail Plan, it nevertheless proposed a local/regional railway station at Toton. This station/rail hub is included within both the SM-SPD and emerging GNSP, and the transport links to it are required to be safeguarded, along with the route for the extension of the NET tram from its existing terminus at Toton.

The **accompanying spreadsheet** provides an assessment of this development proposal against the CTTCNP policies and aspirations. We recognise that the aspirations carry no weight in planning decisions, but they do provide an indication as to whether or not the proposals achieve the community's vision.

The **Planning Statement** submitted as part of this application is selective for the CTTCNP policies it says it complies with, ignoring those it doesn't! The assessment spreadsheet addresses this.

We would be happy to work with the developer and local planning authority to address the deficiencies identified within the CTTCNF assessment and our overall representations to this planning application. CTTCNF

has previously expressed its desire to work proactively and collaboratively with Broxtowe Borough Council and the Developers on proposals being brought forward within the CTTCNF Area by way of a round table discussion including other interested parties. We are re-stating this here as a way forward.

The **Statement of Community Involvement** does not appear to have taken full account of the CTTCNF response to the limited consultation. The methods by which responses could be submitted does not mention the dedicated email address Pegasus set-up for this purpose, and which CTTCNF advertised to its members via its website, and to which CTTCNF sent its own response. Therefore, it is unknown how many responses were received via this route, and consequently the SCI would appear to be selective for the responses it has taken into account. CTTCNF's consultation response accompanies this letter.

Paragraph 6.4 states: "The feedback received during the consultation, has been carefully considered and integrated into the preparation of this application." However, paragraph 5.2 contradicts this by saying "no changes have been made to the illustrative layout that was published at the time of consultation". Therefore, it is unclear what, if anything, has been taken into account as a result of the consultation?

**Planning Statement** paragraph 4.9 (and also paragraph 5.1 of the SCI) states: "Employment land is identified to come forward as part of Local Plan Part 2 Policy 3.2: Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth). The policy does not identify this site for the employment element. It is envisaged that employment will be delivered as part of the wider allocation to the west of Stapleford Lane within Nottinghamshire County Council ownership." Whilst the first and second sentences in this statement are correct, Policy 3.2 goes on to say in part D "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." The SM-SPD (as noted above) identifies employment (as well as residential) within Toton North (part of this proposed site) and Toton South (this proposed site). It does not envisage (as stated by the applicant) that all employment will fall within the land West of Stapleford Lane owned by Nottinghamshire County Council! The applicants are therefore seeking to absolve themselves from any responsibility for providing employment opportunities for circa 1,500 new dwellings across its three development sites (25/00371/OUT, 25/00306/OUT & 25/00255/FUL).

Paragraph 7.14 states: "Retail and community facilities are no (*sic*) proposed on this part of the application site and are identified to come forward as part of the wider allocation. As a standalone development the development would not necessitate the provision of these additional facilities." Clearly this is not a standalone development, and treating it as such (and the applicants' other two development proposals in the same way) is mendacious, deliberately misleading and unhelpful. A holistic approach is required (see below).

This Application should be rejected until sufficient employment as specified in Policy 3.2 of the P2LP, SM-SPD and emerging GNSP Policy 21 has been included within development proposals across the entire SLG, irrespective of land ownership, and an overarching holistic approach agreed by all parties.

**Extant Planning Permissions** within Toton North (as defined in the SM-SPD and draft GNSP Policy 21) are referred to in documents submitted with this application namely, 12/00585/OUT, 17/00131/ROC, 17/00499/REM and 19/00493/REM to justify the lack of community facilities etc. provided. This is disingenuous as these permissions were granted to Peveril between 2012 and 2019, and no such development has taken place or shows any likelihood of being undertaken in the short to medium-term, especially as land ownership has since changed and Nottinghamshire County Council have not as yet, to our knowledge, put forward any development proposals for discussion. Furthermore, during the Independent Examination hearing for the CTTCNP (November 2022), the then consultants acting for Peveril (Stone Planning Services) indicated that there was unlikely to be interest in taking the extant permissions forward at that time (see

<https://www.youtube.com/watch?v=Ch-c4OK2Z44>). Therefore, this justification for nearby facilities should be rejected, since secondary schools and medical facilities in the vicinity are currently at capacity, and there are no community facilities included within this proposal.

Furthermore, the **Illustrative Masterplan** submitted as part of this application, shows within the Toton North Character Area, an 'Adult Sports Pavillion', an area for 'Formal & Informal Sports & Recreation', and another area as a 'Community Plot'. None of these exist and is therefore misleading. As above, it is unknown at this stage what development proposals Nottinghamshire County Council will bring forward, if any for this area.

The **Design and Access Statement** states that the primary street within this site has been designed to provide access to future Toton North development i.e. on the land under Nottinghamshire County Council ownership West of Stapleford lane. It does not mention how this would then connect to a link/relief road to the A52 in the vicinity of Bessell Lane (see below under Transport Assessment).

CTTCNF supports a 20mph speed limit for the lower category streets within the development site.

The diagram on page 72 does not show the lower density housing along the western edge as shown in the diagram on page 70. This discrepancy should be clarified.

The **Transport Assessment** submitted as part of this application suggests in paragraph 4.19 that traffic flows associated with "Toton West" would have a minor impact on the B6003 corridor to the south of the site. CTTCNF contests this conclusion based on lived experience as opposed to a desk-top study. Whilst some of the modelling appears to show improved capacity for some junctions (the new access junction for "Toton West" and the current NET P&R junction), Bardill's island is currently operating above capacity, which is shown to get worse following development. The same is also the case for the M1 junction 25 and Bramcote island on the A52. Any modelling for the junctions of the B6003 with Swiney Way, and further south with the A6005 Nottingham Road are missing, but modelling provided with the other applications has previously indicated these are at/over capacity and will be worse by 2041, which won't be helped by increased traffic from this development.

Furthermore (as per the Transport Assessments for the other applications) the highways impact summary admits that the traffic modelling "requires updating to reflect amendments made to the wider Toton development proposals" and "Consideration will also need to be given to the committed developments and infrastructure works included in the future year modelling and assumed traffic generation included in the modelling for committed and proposed developments." (para 4.42). In addition para 4.43 goes on to say "The requirement for wider infrastructure works at junctions on the A52 and B6003 corridors will need to be considered in more detail once the updated modelling has been carried out and revised junction assessments undertaken."

Therefore, CTTCNF rejects the Highways Impact within the Transport Assessment as not fit for purpose, especially as it also ignores the impact of extending the NET across the B6003 (as proposed in the SM-SPD & GNSP) and supported within the CTTCNP). There is also a suggestion made that the current NET P&R T-junction on the B6003 could become a crossroad junction to facilitate access to the Toton North Character Area (Nottinghamshire County Council owned land West of Stapleford Lane, immediately North of this application site), adding further traffic on Stapleford Lane. This has not been factored into the modelling. Neither has a second link/relief road from the developments West of Stapleford Lane to the A52 in the vicinity of Bessell Lane as proposed by the SM-SPD (para 5.8) and GNSP Policy 21 (para 2.D.10). This road has not been mentioned at all within this application.

As a result, the Transport Assessment (and the development based upon it) should be rejected and a full traffic assessment performed. A traffic modelling and feasibility study will be required for the whole of the Toton SLG

and Chetwynd Barracks developments (as required by P2LP Policy 3.2 A (viii)), including the link roads, and all new junctions fully assessed for the overall impact of all the developments on all roads. This study should also determine the most suitable route and location for the two link roads, as well as the layout and design of all new junctions. The feasibility study should also include the potential to reconfigure Bardill's island to allow prioritisation of through traffic along the A52 to and from Derby and M1 junction 25. That is, the feasibility to provide grade separation for local traffic away from the A52, perhaps by use of a flyover over Bardill's island to keep the A52 traffic flowing in both directions (similar to the A52 flyover above Dunkirk island).

This is likely to be required (or another solution determined), especially if there are new junctions on to the A52 as proposed for Chetwynd/Toton SLG between Bramcote & Bardill's islands as well as to and from development West of Stapleford Lane on to the A52 in the vicinity of Bessell Lane, as otherwise congestion will result in both directions from these junctions within the space of approximately 1-2 miles along the A52 between the M1 and Bramcote island. Grade separation may be possible with the release/allocation of the 20 hectares of land at Toton Northeast (proposed to be released from the green belt by the draft GNSP), and should be considered.

Appendix E within the Transport Assessment provides a diagram showing a suggested potential junction improvement for Bardills island. However, it is not clear how this design would improve the situation for the wider area once all the proposed developments have been completed?

CTTCNF supports link roads to relieve traffic congestion on the B6003 from the proposed new developments, but considers a full study is required as set-out above.

**We have included below a number of issues either not covered within the assessment spreadsheet, or as an expansion of the comments made within it:-**

### **1. Holistic Approach to Developments in Chetwynd Barracks and the Strategic Location for Growth**

The SM-SPD and Policy 21 of the draft Greater Nottingham Strategic Plan (GNSP) require that any development in Chetwynd Barracks (P2LP Policy 3.1) and the Toton Strategic Location for Growth (SLG) (P2LP Policy 3.2) is considered as part of a holistic view, particularly for infrastructure changes (roads, public transport, healthcare, education, services & facilities, etc.). This application ignores the impact on, and of, other possible developments when considering the needs of the existing and proposed new communities. Currently individual planning applications are being submitted piecemeal without any wider consideration and holistic approach. This application should therefore be rejected or put on hold until a holistic approach to the infrastructure requirements of all the potential developments in the Toton and Chetwynd allocated site, as well as the site north of the tram line, has been created and agreed with landowners, potential developers, local planning authority and CTTCNF.

The major development proposals being put forward now by Bloor/Peveril for Toton and Chetwynd, and those that are to follow from the other landowners, provide a once in a generation/lifetime opportunity to create high quality ambitions as set out in the Toton and Chetwynd SM-SPD and CTTCNP to build not just much needed homes, but a community that we can all be proud of. A significant part of that ambition is getting the urban design right to create a real sense of identity for the new community that will be created, but without adversely impacting the existing and wider community (see further comments on urban design below).

### **2. Character Area Descriptors**

CTTCNF is concerned that the descriptors used for the proposed development sites (including this one) within the SLG do not follow those used for the indicative Character Areas as defined within the draft GNSP (Policy 21) and the extant Toton & Chetwynd SM-SPD. Inevitably this will lead to confusion, since what is being called Toton "West" (this application 25/00371/OUT) is actually Toton South; what is being called Toton "North"

(25/00306/OUT) is actually Toton Northeast together with part of Toton East south of the tram line plus a large section of the green belt not yet released for development; and Toton East (25/00255/FUL) is now split in two with part of it located in what is being called Toton “North”. The official Character Areas of Toton West and Toton North are in completely different locations.

This confusion must be rectified with the developers prior to any approval being granted.

### 3. Urban Design

In addition to CTTCNF’s representations provided within the accompanying assessment spreadsheet against the CTTCNP policies, we have the following comments:-

The **Design and Access Statement** is vague with insufficient detail to properly assess this development proposal against CTTCNP policies. However, CTTCNF supports a tenure blind approach to affordable housing to ensure integration and avoid any sense of ghettoisation.

It is important at this stage to get the urban design (including house designs) right to create a real sense of civic identity for the new community that will be created, and without adversely impacting the existing and wider community. To this end Building for a Healthy Life (BHL) as required by the P2LP (Policy 17 (3)), CTTCNP, and the emerging GNSP should be incorporated into the overall design.

The CTTCNP Policy HAS02 also calls for BREEAM Communities (a widely used design tool for creating places that are better for people and nature, written in partnership with Homes England, NHS England and NHS Improvement). This should be included within this application.

Housing designs should be innovative and provide a sense of character or distinctiveness for the development site, and ‘off the shelf’ designs should be avoided.

These issues must be rectified with the developers prior to any approval being granted and the following recommendations pursued:-

- The planning application is reviewed by Design: Midlands;
- Following the above review, a new master plan/parameter plan is produced and consulted upon taking into account: a) that no scheme must be permitted to come forward with restrictions on frontage access; b) have streets as opposed to roads that fulfil the relief function albeit with vehicles travelling at a low speed; c) provide tree lined avenues or boulevards with homes lining these; d) have direct access and ‘on plot’ turning allowing vehicles to enter the street in forward gear; and d) provide a higher density, low car development with suitable car management arrangements in place - the proximity to the Toton tram stop offers a unique opportunity to create an urban village (as opposed to a suburban development), help sustain the tram network and maximise the use of land (as required by the NPPF).
- That a Design Code is submitted and approved prior to the submission of any future Reserved Matters applications.

N.B. CTTCNF have also consulted on Design Codes and Masterplans which have been used to obtain community feedback on possible developments within the CTTCNF Area. (The results of the consultation, as well as the design codes, are available through our website <http://cttcnf.org.uk/>).

### 4. Environment

CTTCNF’s representations are provided in full within the accompanying assessment spreadsheet against the CTTCNP policies. However, CTTCNF wishes to reiterate that it does not support offsite delivery of biodiversity net gain units, and expects that any mitigation of biodiversity loss should occur within the application site.

## 5. Infrastructure

In addition to CTCNF's representations provided within the accompanying assessment spreadsheet against the CTCNP policies, we have the following comments (in addition to those made above in relation to the **Transport Assessment**):-

- The Environmental Statement Table 9.4 does not consider the operational impact on the B6003 between the proposed access to the B6003 and Bardill's roundabout. It does consider the impact north of Bardill's Roundabout and south of the Site. However, much traffic (both during the proposed seven years of construction and afterwards during operation) will be to and from Bardill's roundabout; this is the infrastructure element most likely to be affected.
- The Environmental Statement Paragraph 9.5.16 states that the impact upon pedestrian delay will be "negligible". However, this fails to take account of the changes to the traffic flows along the B6003 south of this development caused by the change in fragmentation of the traffic going south on the B6003. It is already difficult to cross the B6003 because of the competing flows north & south on the B6003 (as shown by paragraph 2.33 of the Transport Assessment), the new junction will reduce any gaps in traffic coming south on the B6003, making crossing the B6003 more difficult and further isolating the community to the east of the B6003.
- The second link/relief road to the A52 in the vicinity of Bessell Lane is supported in principle, but the route should be determined as outlined above. This road should be used for construction traffic to/from the A52 for development West of Stapleford lane during construction, and not the B6003 to avoid further congestion issues.
- Improvements to footpaths in and around the site is supported. However, the section of footpath FP17 that runs alongside the electricity sub-station, and lies just outside the site boundary, must also be improved.
- The Travel Plan is generally supported, as is the role of the Travel Plan Coordinator.
- The undergrounding of electricity cables within the site is supported, as it would be for the whole of the Toton and Chetwynd strategic site. However, there is no indication of the internal route or for necessary enhancements to the electricity substation and the planned battery storage facility that will be in close proximity to the site. There is also no indication of the route or the width of the protection zone for the cables (from any development close by), and its implication for the development, especially if the cables can't be placed underground.

## 6. Housing & Sustainability

CTCNF's representations are provided in full within the accompanying assessment spreadsheet against the CTCNP policies.

## 7. Leisure & Community Facilities

CTCNF's representations are provided in full within the accompanying assessment spreadsheet against the CTCNP policies.

## 8. Employment

In addition to CTCNF's representations provided within the accompanying assessment spreadsheet against the CTCNP policies, and those provided earlier within this letter, we have the following comments:-

- CTCNP policies EMP01 and EMP03 apply to this site. CTCNF is disappointed that there appears to be no consideration for employment within the proposal, or any of the related proposals from the same developers. This proposal for 420 homes alone will generate an increase in the local population, and therefore employment on site, or in close proximity to it will be necessary. Without significant opportunities for employment, this, and

those other proposals, will create an "employment desert" and significantly increase traffic in the area as people commute elsewhere. Increased trips will be generated as there will be the necessity to travel for work, education, leisure, healthcare needs and retail. This should be addressed.

- There may be some jobs supported during the build out of this proposal, however there are no permanent jobs created by this application, and it does not contribute towards the at least 18,000sqm of employment space required by the P2LP (rising to 32,000sqm within the draft GNSP).

## **9. Developer Contributions**

The developer is anticipating the need to make Section 106 financial contributions towards infrastructure in negotiation with Broxtowe as per the **Planning Statement**. However, that doesn't solve the problem of the lack of services and community facilities as the homes are built!

This needs to be addressed before development commences, and delivered in parallel with it.

## **10. Viewpoint Photographs**

A number of the viewpoint photographs fail to take account of the proposals in 25/00255 and 25/00306. The views will be significantly different from those suggested.

## **Conclusion**

CTTCNF is objecting to this planning application as it does not comply with the overall Development Plan as set-out within our representations above and in the accompanying assessment of this proposal against the CTTCNP policies. The application should not proceed in its present form until all the issues have been resolved. However, as stated above, we would be happy to work with the developer and local planning authority to address the deficiencies identified by way of a round table discussion including other interested parties, to ensure that resolution.

As there have been no pre-application discussions, CTTCNF would be happy to work with the developers and Broxtowe Borough Council as the LPA during any pre-application or reserved matters meetings, especially as the CTTCNP forms part of the Development Plan alongside the Local Plan.

**These representations have been submitted on behalf of the Chetwynd: The Toton & Chilwell Neighbourhood Forum**

Date 3rd July 2025