

APPENDIX 1

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.

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.
- 2.8 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.
- 2.9 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.
- 2.10 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').

- 2.11 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.

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><u>ENV01</u></p> <p>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.</p> <p><i>In addition, other green spaces may be designated during the Plan period.</i></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 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</p>

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	<p>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><u>ENV02</u></p> <p>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.</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><u>ENV03</u></p> <p>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.</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>
<p><u>ENV04</u></p>	<p>The Borough Council is unclear what the 'relevant masterplan' refers to. Would this be the Toton and</p>

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<p>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.</p>	<p>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>ENV05</p> <p>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.</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>ENV06</p> <p>Development should not involve the removal of mature trees including TPOs, veteran and ancient trees. Development should seek to minimise the</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 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</p>

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<p>loss of other trees. Habitat lost to development must be replaced by equivalent species plus the necessary biodiversity gain.</p>	<p>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>ENV07</p> <p>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).</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 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>
<p>ENV08</p>	<p>The Borough Council is unclear as to how</p>

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<p>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.</p>	<p>applicants would necessarily be able to comply with this policy and would welcome some clarification.</p>
<p>INF01</p> <p>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.</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>INF02</p> <p>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.</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>
<p>INF03</p> <p>Provision of new, dedicated cycle routes (off - road and separated on-road) through</p>	<p>The Borough Council would like to clarify who would be responsible for providing these routes or whether this is an aspiration?</p>

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the Area will be required. Separated lanes should be included within new green corridors (see ENV03 and ENV04).	
INF04 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.	<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>
INF05 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.	<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>
INF06 East Midlands Hub Station parking should not be allowed on residential streets, especially to the west of Stapleford Lane.	<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 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.</p>
INF07	In so far as this issue could be influenced by the

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<p>All development of the SLG and Chetwynd Barracks should preserve, enhance and encourage re-routing of bus services through the Area.</p>	<p>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>
<p>INF08</p> <p>New developments should provide adequate levels of parking to minimise on-street parking.</p>	<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>
<p>INF09</p> <p>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.</p>	<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>
<p>HAS01</p> <p>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% Affordable Rented and 13.5% Market Rented homes.</p>	<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>
<p>HAS02</p> <p>In all developments on</p>	<p>It is not entirely clear where the 'mix of housing types and sizes' is outlined?</p>

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<p>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, <i>variation to the housing mix will be considered by the Neighbourhood Forum in future.</i></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>HAS06</p> <p>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. Water Efficient Fittings should be included in all refurbishments and any new developments to achieve a lower overall water</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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consumption.	
<p>HAS07</p> <p>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.</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>URB01</p> <p>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.</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>URB03</p> <p>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.</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>URB05</p> <p>Proposals for the Toton Innovation Campus (the 'Campus') can include a mix of buildings which integrate business, residential and retail</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 the needs of commuters travelling to/from the Hub Station'</i>, which might no longer be relevant, as a result of the IRP.</p>

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opportunities both as separate buildings and as combined buildings with commercial offices and apartments integrated in a single structure.	
<p>LHC01</p> <p>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.</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>LHC02</p> <p>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.</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 before decisions can be made as to their future role/purpose’.</i> The Borough Council would like to clarify whether this would be included during a ‘formal review’ of the Neighbourhood Plan.</p>
LHC04	The Borough Council is of the view that it would

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<p><i>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.</i></p>	<p>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>LHC05</p> <p>Provision of a primary school and new medical facilities (both needed to meet forecast demand) will be strongly supported.</p>	<p>The Borough Council notes that the policy does not appear to refer to a site / location. The justification text appears to refer to Chetwynd Barracks but there is no mention of the Strategic Location for Growth at Toton site?</p>
<p>LHC06</p> <p>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.</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>LHC08</p> <p>The provision of allotments/communal gardens within easy walking distances of new homes will be supported.</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 'supported') and the justification text, which implies that allotments 'should' be provided.</p>
<p>EMP01</p> <p>The new 'Innovation</p>	<p>The Borough Council notes that the justification text states: '<i>Developments comprising mixed-use buildings that incorporate both commercial and</i></p>

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<p>Campus' should maximise employment potential. Proposals for B1 class buildings that provide significant numbers of jobs will be supported.</p>	<p><i>residential uses will be particularly welcomed'</i>, which, arguably, effectively extends the policy rather than providing a justification for it.</p>
<p>EMP02</p> <p>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.</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>EMP03</p> <p>The design and development of the commercial zones should be:</p> <ul style="list-style-type: none"> - visually attractive and compatible with the surrounding area and include screening where necessary; - of a scale, design and finish appropriate to its setting, particularly where it can be viewed from high ground; - landscaped in a manner that retains existing trees/hedgerows and blends with nearby green spaces using new planting as appropriate. 	<p>The Borough Council is unclear as to whether there should be some justification text for this policy?</p>
<p>EMP04</p>	<p>The justification text suggests that the 'Centre for</p>

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<p>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.</p>	<p>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>EMP05</p> <p>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.</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>

Version 6

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