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Dear Sirs,

**REPRESENTATIONS TO RUSHCLIFFE BOROUGH COUNCIL LOCAL PLAN PART 2 AND DRAFT GREEN BELT REVIEW IN RESPECT OF LAND EAST OF TOLLERTON LANE (REF TOL 3)**

These written representations have been prepared by Savills (UK) Limited on behalf of the Ceylon Tea Growers Association Ltd (the landowners) in support of the removal of land east of Tollerton Lane ("the site") from the designated Green Belt and its promotion as a housing allocation in the emerging Rushcliffe Borough Council (RBC) Local Plan Part 2.

The representations that follow build on those submitted previously as part of the Local Plan process and SHLAA process (site reference 260) and have been prepared in the context of paragraph 182 of the National Planning Policy Framework ("the Framework") which states that a plan should be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

**Site Deliverability and Developability**

Site

The 2.3 Ha greenfield site is located to the east of Tollerton Lane adjacent to the settlement of Tollerton, 4 miles south-east of West Bridgford and 7 miles south-east of Nottingham City Centre. It was subject to a successful application for 5 affordable dwellings as part of planning application 08/01515/FUL. This element of the site is no longer to be included within the SHLAA.

Aside from these properties, now built, the site lies amongst an existing row of residential properties which border the northern, centre and southern edges of the site. It lies to the eastern edge of the settlement which contains a number of facilities and services including restaurants, public houses, Tollerton Primary School and a small number of convenience shops. Regular public transport bus links (no. 29/ Keyworth Connection/ 853) are available either opposite or within 5 minutes walking distance of the site, providing transport to Nottingham and the surrounding settlements. It represents a sustainable location for growth.



Whilst agricultural land lies to the west, there lies the opportunity to create a strong defensible boundary through appropriate landscaping and planting. As mentioned above, the site has been promoted within the SHLAA (reference 260). It provides a number of assumptions in respect of the site's deliverability and developability and ultimately identifies it as a site which "*could be suitable if policy changes (i.e. 5+ years)*".

#### Deliverability

The site is available now and has the potential to deliver in the region of up to 70 dwellings at a density of 30 dwellings per hectare on the gross site area. The site is promoted by a willing landowner and there is a strong residential development market in the area, having been approached by potential developers. There are therefore no reasons why the site could not come forward within the next five years.

#### Developability

Access would be gained via Tollerton Lane which links directly to the A606. It is noted within the SHLAA that this would likely involve a series of direct frontages onto Tollerton Lane. Whilst the exact access arrangements and traffic implications would be subject to a detailed Transport Assessment, it is understood that there would be no insurmountable constraints in bringing development forward on this site, further it is sited within a suitable location which would reasonably allow for the encouragement of more sustainable travel modes.

The site currently lies within the designated Green Belt, however this is being reviewed (explained further below) and it is agreed by RBC that the site no longer performs a strong Green Belt function.

In respect of other designations, the site is entirely located within flood risk zone 1 (lowest risk). There are no statutory ecological designations on the site or in close proximity, further there are no Tree Preservation Orders on the site or heritage assets of note. Given it is a greenfield site it is unlikely that there will be any significant ground contamination issues.

The strength of the landscape character of the area is deemed as 'moderate', with the landscape strategy to enhance the characteristics of the area. A public right of way crosses the northern half of the site from Tollerton towards Cotgrave Road, which it is proposed would be retained.

Therefore, whilst the site will be subject to detailed technical reports in due course it is understood at this stage that it is in principle a deliverable and developable site in accordance with the definition of the NPPF paragraph 47, footnotes 11 and 12.

### **Commentary on the Draft Local Plan Part Two**

#### Question 1 and 2

It is clear, as stated at page 6 of the document, that delays to five of the six large sites allocated by the Core Strategy has led to a situation whereby they are unlikely to deliver as many new homes as previously expected, both overall by the end of the plan period (2028) and also during the next five years, creating a shortfall in the amount of land that is available for housing development over the coming years.

We agree with Question 1 and 2 and support the assessment that, by April 2019, the shortfall in land needed for housing development could lead to around 900 fewer homes being built than is required over the subsequent five years (2019 to 2024), unless action is taken through the Local Plan Part 2 to address the situation including Green Belt release in respect of new, smaller sites.

This approach is correct and directly echoes that of the February 2017 DCLG White Paper- Fixing our Broken Housing Market, step three of which explicitly states that the government will promote backing small and medium-sized builders (SMEs) to grow, including through the new Home Building Fund.

### Question 27 – TOL3, land east of Tollerton Lane

We support the allocation of land east of Tollerton Lane for a potential capacity of up to 70 homes as a deliverable and developable site. We suggest a quantum of up to 70 homes as detailed site capacity work has not been undertaken to establish the net developable area.

Whilst the site is early on in the development process and as such will be subject to various technical matters, as demonstrated above it is an in principle deliverable and developable site, as directly recognised through the SHLAA. It is therefore an excellent example of such necessary smaller sites, where there are no significant infrastructure issues to deliver short term growth and boost the short term housing land supply.

The site should therefore be allocated given its deliverability and developability nature in accordance with paragraph 47 of the NPPF, need for effective local plan making and in accordance with the recent DCLG drive for encouraging growth within the SME sector as set out within the February White Paper.

*Recommendation 1: Allocate site TOL3 for up to 70 homes in interests of effective plan making.*

### **Commentary on the Draft Green Belt Review**

The site has been reviewed within the draft Green Belt (site TOL3) and noted as being within an area of “*low to medium Green Belt importance*” (paragraph 3.75).

Having assessed the site independently we generally agree with the above assessment in respect of the five tests, however wish to make a number of points:

- *Checking unrestricted sprawl* – We understand that, whilst there are no physical features to the eastern boundary we are prepared to propose landscape planting and screening to form a defensible boundary of a certain depth to be agreed which would mitigate the development’s impact and contain any prospect of unrestricted sprawl, subject to an appropriate design.

This point can therefore be overcome with appropriate mitigation, which serving a dual purpose would lower the visual impact of the development and prevent the ability for additional encroachment beyond that which is proposed. If the score included this proposed mitigation we believe that the score could be lowered from 4 to 1.

- *Assist in safeguarding the countryside from encroachment* – The site is within a landscape area of moderate value and its defined wide open characteristics will not alter as a result of the proposed development. In any event, the site will be subject to the above proposed mitigation measures to allow for a sensitive development. The rationale for the score is unclear, particularly given the comment that ‘residential development is inappropriate and constitutes encroachment’. This comment is irrelevant. Green Belt release is required as part of the wider housing strategy. The site’s score should be reduced from 3 to 1.
- *Assisting in urban regeneration* – This is often discounted in council green belt assessments (as has been the case within the Greater Manchester Spatial Framework and Leeds City Council Local Plans). Again it is irrelevant, given the wider housing market failures. Whilst Green Belt should aim to promote urban intensification it is the case, as RBC have recognised, that Green Belt release is required given the failure. The site’s score should be reduced in this instance from 3 to 1.

Following our review and in context of the proposed mitigation, the site’s score should be reduced from 12 to 5 therefore bringing it from a low-medium impact to a definitive low impact. We believe this to be an accurate assessment.

It is therefore considered that the Green Belt’s function is no longer relevant with this site and it should be removed to allow sustainable and deliverable short term growth in the interests of effective plan making.

*Recommendation 2: Reduce the site's score from 12 to 5 to take into account proposed mitigation measures and remove the Green Belt designation given its weak function, in the interests of effective and justified plan making.*

### **Recommendations and next steps**

Our recommendations are twofold. Firstly, we recommend that site TOL3 be allocated as a deliverable and developable site in the interests of effective plan making and the need for smaller Green Belt release sites to come forward to address the urgent housing need. This is in line with DCLG moves to encourage SMEs, as set out within the February 2017 Housing White Paper.

Secondly, whilst we agree with the broad thrust of the Green Belt review, we recommend that the site's score be lowered from 12 to 5 and recognised as performing a low Green Belt function in the interests justified and effective planning in light of the mitigation proposed. In any event we recognise that it is a less sensitive site in respect of Green Belt function and recommend that it should be removed from this designation.

It remains that the site is both deliverable and developable and as such can come forward for development now in order to meet an urgent need and contribute towards the range of sites required to deliver Rushcliffe's five year housing land supply.

We would welcome the opportunity to meet in person to discuss the site in more detail. However, please do not hesitate to contact either Rob Moore or Adam Key at this office to discuss any aspect of the representations.

We look forward to receiving confirmation of receipt in due course.

Yours faithfully,

Savills (UK) Ltd