

31 March

Councillor Richard Butler and Mr Richard Mapletoft
Cabinet Member for Planning Policy and Manager for Planning Policy
Rushcliffe Borough Council
Rushcliffe Arena
Rugby Road
West Bridgford

#### Dear Richard

Thank you for seeking the views of Tollerton Parish Council on the three consultations being undertaken by the borough council. The parish council would also like to convey its thanks to the borough council for holding one of its consultation events in the village and notes the high turnout of residents throughout this event with over fifty residents continuously present throughout the session showing the interest and/or concern in the consultation within the parish.

Tollerton Parish Council notes that the review of green belt sites concludes that all of the sites reviewed within the parish are considered important to the green belt. Tollerton parish council strongly and unanimous supports this view but considers that the importance of all of these sites has been underrated. The parish council does not agree that any of the sites within the parish should be removed from the green belt or would currently be suitable for development.

The parish council is hugely disappointed by the Borough Council's decision to review these sites again. The Council's understanding of national planning policy is that review of the green belt, such as that undertaken in 2014 to inform the development of the local plan, should secure a degree of permanence for the green belt.

The parish council considers that the status of green belt within the parish was clearly determined through the local plan process and should not be reviewed again within the lifespan of the current plan unless exceptional circumstances arise. The parish council believes that the comments of the planning inspector that considered the local plan support this view.

The parish council does not consider that any evidence has been produced by the borough council demonstrating such exceptional circumstance requiring an addition review of green belt set through the local plan and that in carrying out this review the borough council is in danger of calling into question the appropriateness of the local plan.



Tollerton parish council has agreed a number of further points in response to the consultation which are set out below. Additionally, the Parish Council supports the detailed comments and evidence provided in response to the consultation by Tollerton residents groups (TABU and TASC) which are also included as an appendix to this submission.

In responding to these consultations the parish council notes the concerns of residents regarding the inconsistency of naming and numbering of sites across the different consultations and the SHLAA. The parish council asks that consideration be given to the introduction a unique identifier for potential sites across the borough to support better understanding and engagement with the Borough Council's planning processes.

Through engagement with the population of rushcliffe resident in Tollerton, Tollerton Parish Council also notes the concerns of residents as to

- the appropriateness of development requirements placed on the borough which do not appear to have been reviewed in light of major national developments such as the triggering of article 50 and requests that the Borough Council update the evidence base for housing need in light of this and other changes to inform any decisions on part 2 of the local plan.
- whether the local plan is fit for purpose. The Borough Council has offered residents and the parish council no evidence that the reliance on large strategic allocation sites can be delivered and is seeking additional sites due to non-delivery on these existing sites. Tollerton Parish Council urges the Borough Council to take proactive action to bring these sites forward and publish a clear plan as to the action that it will take and evidence to demonstrate that these sites will be developed within an appropriate timescale to avoid further review of the green belt and housing sites across the borough.
- the lack of recognition of community priorities, local lists and designations in the review process and requests that the Borough Council have regard to parish plans and community conservation strategies as part of this process.

Tollerton Parish Council hopes that through proper consideration of the issues raised by the parish council and Tollerton residents, borough councilors will share **our conclusion that further development on the sites put forward in Tollerton would be inappropriate and that future development should be community led through the neighbourhood plan process**.

Yours Sincerely,

Matthew Garrard Chairman of the Parish Council



#### Review of Green Belt

Tollerton Parish Council does not agree that the review should include "other villages". The housing need is strategic and should focus on key settlements. Unless local need has been established in "the other villages" the green belt should not be amended.

Where a neighbourhood plan is in place or area designated (as in Tollerton) this should be the appropriate mechanism for determining local need

Green belt should have permanence beyond existing plan periods. The Green belt around Tollerton was only reviewed in 2014 should not be reviewed again so soon or during the lifetime of the current plan.

Tollerton does not have the same "basic level of facilities" of other villages to accommodate additional growth, in particular there are no GP facilities or school capacity within the village when compared to other settlements to warrant inclusion in this review.

We agree that the four sites in Tollerton remain of importance to green belt and therefore should not be removed from it. This is consistent with the findings of the Planning Inspector for the overall Local Plan when considering the potential effects of bringing housing closer to the village

#### TOL 1 Land South of Little Lane

Agree fundamentally constrained and key to green buffer and defensible green belt between Tollerton and Strategic Allocation Site

We view the preserve character score as too low, this should be 5 to reflect historic mill and local conservation designation in the Tollerton Character, Heritage and Conservation Strategy

#### TOL 2 Land West of Tollerton Lane

Is of high importance to the green belt and also key to green buffer and defensible green belt between Tollerton and Strategic Allocation Site. Prevent merging of settlements should therefore be scored 5.

#### TOL3 - Land East of Tollerton Lane

Current boundary of site is clear, permanent and key to preventing urban sprawl. The proposed change would not form an appropriate replacement

Views across this site extend from the village centre along Burnside Grove. Development of this site would give the perception in the reduction of distance between Tollerton, Normanton and Plumtree. Prevent merging should have a score of 2

Rushcliffe SHLAA site concludes this site is only suitable for local need – no evidence of this has been provided and at this time the parish council concludes that none has been established.

This green belt review has been instigated in response to strategic need and therefore this site should not be considered. The site lies in a designated neighbourhood plan area – this is appropriate process to determine local need and allocation of sites for local need.

Site is setting for properties contained on a local list set out in the Tollerton Character, Heritage and Conservation Strategy and should score a 2. The site also provides the setting for the decoy and grounds of Tollerton Hall which has not been considered

#### TOL 4 - Land North of Burnside Grove

The topography of the site means that the current boundary prevents sprawl and should be scored a 4



#### Local Plan Part 2

Tollerton does not have the "basic level of facilities" of other villages to accommodate additional growth, in particular there are no GP facilities or school capacity within the village when compared to other settlements to warrant inclusion in this review

The ability of Tollerton to take any additional housing is also frustrated by the severe and overriding existing issues set out by TASC regarding – road capacity, road safety, lack of cycle routes, lack of pavements, limited access to public transport, and the cumulative impact that other agreed sites will have on these highway issues.

Sites that do not add to these issues should be prioritized, starting with major settlements along the A52 corridor and sites linked to Nottingham by the dualled A453 and tram extension, such as Raddliffe and Bingham and if demonstrable need Newton, Sutton Bonnington and Gotham.

#### Land at Burnside Grove

- This open countryside contributes to the rurality of Tollerton and, due to the slope of the land, any development would be visible over quite a distance to the north.
- Has importance as and should remain in the Green Belt. It is contained within Zone 5.1 in the 2013 Green Belt Review which stated that Zone 5.1 "should ideally remain as Green Belt".
- The proposed boundary to the north is not a defensible boundary since it is a weak hedgerow. It is important to have a defensible boundary to prevent future merging of Tollerton with Edwalton or with the new strategic allocation to the north.
- Additional houses at this site would be likely to significantly increase traffic in the centre of the village and around the school.
- There is no suitable access to the site. Russell Farm Close does not offer a suitable vehicular access to this site.
- The number of houses proposed is excessive for this site which given topography constraints and sympathetic building in keeping with character of village would probably accommodate half the number of houses identified
- Oak tree court has a number of conditions placed on it to protect the character of Tollerton which would also be applicable to this site

#### West of Tollerton Lane and North of Medina

- This site has higher Green Belt scores than any other of the additional key settlement sites or other villages sites. TOL2 is contained within Zone 5.1 in the 2013 Green Belt Review which stated that Zone 5.1 "should ideally remain as Green Belt".
- Development on this site would reduce the distance between Tollerton village and the new settlement to be built in the Strategic Allocation just north of this site, causing the two to almost merge contrary to the Inspector's recommendations.
- This is a locally designated conservation area within the Tollerton Character, Heritage and Conservation
   Strategy in recognition of the valuable open countryside that is an important characteristic of Tollerton old village.
- Tollerton old village also has a rich history and the setting and special character of this part of Tollerton would be spoilt by development. In the immediate vicinity, in the old village, are Tollerton Hall and 6 listed



buildings including the Church (with current foundations dating back to the 12th century), the Old Rectory (rebuilt between 1697 and 1702) and Bassingfield House, and 8 local interest buildings. The northern lodge (1824) to the Hall is on Cotgrave Lane, and the edge of the built village includes North End Cottages, built between 1833 and 1847 by Pendock Barry Barry, the then squire of the village, as accommodation for villagers with a further building used as a school. Those buildings retain distinctive features of the estate design at that time and an architectural coherence on the edge of the village. The history of Tollerton is an important focus of the Tollerton community, which has a thriving History Group.

- Evidence strongly suggest that the Tollerton mill, certainly from 1683 and possibly from the twelfth century
  was sited in here on the slope of the hill on which Jubilee Wood now stands. An application has been made
  to have this included in the Historic Environment Record.
- The older parts of the village (adjacent to TOL2) retain the church, the village war memorial and social activities in the parish rooms including parent and toddler groups, which are used by all the village. The site of the village pinfold has recently been marked by a rebuilding. Tollerton has its own unique identity which would be lost if development went ahead on TOL2.
- As the Inspector recommended as recently as December 2014, TOL2 should not be removed from the Green Belt. Much of the western boundary and part of the eastern boundary consist of weak hedgerows, which would not form defensible Green Belt boundaries.
- The southern part of TOL2 provides a visual gap between the old village and the new village. Development of this part of TOL2 would spoil the setting of the old village by merging it with the newer part of Tollerton village.
- TOL2 is next to the old village which is very poorly served by public transport. Buses are unreliable and run no more than once an hour, with the latest bus leaving Tollerton before 5.30pm and with no buses on Sundays.
- There is no provision for safe cycling from TOL2 and pavements from the old village to the new village are very poor in places. There are no pavements going north from TOL2 to Gamston.
- There are no shops and very few facilities or services in the old village.
- TOL2 is in close proximity to Jubilee Wood which is home to a variety of wildlife, including bats, and it would not be appropriate to build on this site since this would jeopardise an island of natural habitat of which there are very few so close to the city.
- TOL2 contains part of a footpath giving access to countryside walking and such access should not be lost.

#### Land East of Tollerton Lane

- Rushcliffe SHLAA site concludes this site is only suitable for local need no evidence of this has been provided and at this time the parish council concludes that none has been established. This green belt review has been instigated in response to strategic need and therefore this site should not be considered. The site lies in a designated neighbourhood plan area this is appropriate process to determine local need and allocation of sites for local need.
- Open countryside is an important characteristic of Tollerton as a rural village. Building on this site would remove the extensive views of open countryside enjoyed by all from a relatively long stretch of Tollerton Lane (for the gain of relatively few houses.) and contrary to the local priorities set out in the Tollerton Community (Parish) Plan
- Tollerton Lane is noted as an area containing properties of merit and distinction within the Tollerton Character, Heritage and Conservation Strategy that would be detrimentally impacted by the proposed



development. These properties are visible from the approaches to the village and Nottingham on Melton Road and are a fundamental characteristic of the village.

- Tollerton Lane is of typical characteristics that define the village including through roads with open views on one side. Development on this site would fundamentally alter the character of the village.
- The views of open countryside from this site are also visible from the village centre. Development of this site would frustrate the priorities of the Tollerton Community (Parish) Plan to protect such views from the village centre
- The fields to the east of this site are visible over a wide area in several directions.
- This site does not have defensible boundaries and so should not be removed from the Green Belt.
- It would be out of character with existing building to build houses other than as a single row. This reduces the number of houses possible to approx. 16
- Part of this site is required to remain as an access to the field to the east of the side. This reduces the land available for housing.
- A significant part of this site would be required to offset highway issues around the school through provision of a landscaped garden and parking reducing capacity for housing
- This site contains part of a footpath giving walking access to the countryside and such access should not be lost.

#### Community Infrastructure Levy

Tollerton parish council is supportive of the introduction of a community infrastructure levy and notes the critical need for infrastructure improvements in Tollerton. The Parish Council does not agree with the proposal as it stands.

Throughout the green belt review and local plan consultations Tollerton is identified as "an other village" with basic facilities. Within the CIL consultation Tollerton is treated the same as a core settlement and yet the parish – and in particular the strategic site within the parish – lack the infrastructure needed to support development. Tollerton should be included in the higher band (£100)

Given that a large part of the East of Gamston / North of Tollerton site is likely to be classed as brownfield, but has infrastructure largely equivalent of a green field site it is important for the site to be included in the higher band.



# **Rushcliffe Local Plan Part 2: Land and Planning Policies – Further Options**

# **Response Form**

Please return by **5pm on Friday 31 March 2017** to: Planning Policy, Rushcliffe Borough Council Rushcliffe Arena, Rugby Road Nottingham. NG2 7YG

Or to: <a href="mailto:localdevelopment@rushcliffe.gov.uk">localdevelopment@rushcliffe.gov.uk</a>

Please note that your comments can be directly entered through the Borough Council's online consultation system: <a href="http://rushcliffe-consult.objective.co.uk/portal">http://rushcliffe-consult.objective.co.uk/portal</a>

Your Details		Agent details (where applicable)
Tollerton Against Backdoor Urbanisation (TABU):	Name	Click here to enter text.
TABU is a campaign group working to preserve the rural nature of Tollerton as a village.		
TABU represents a large membership of Tollerton people.		
This document is submitted on their behalf.		
Secretary: Hazel Salisbury 165 Tollerton Lane Tollerton Nottingham	Address	Click here to enter text.
TollertonTABU@gmail.com	E-mail	Click here to enter text.

# **Housing Development**

### **Housing Land Supply**

<b>Question 1</b> : Do you agree with the Council's assessment of the present housing supply situation and that enough land will need to be identified by Local Plan Part 2 to accommodate around 2,000 new homes?			
Yes			

No	 $\checkmark$	
Don't know		

Please provide any comments you wish to make to support your response.

The proposed housing numbers are based out of date evidence provided for the compilation of the now repealed East Midlands Regional Plan. We do not believe that evidence is any longer appropriate or credible, and we therefore do not believe it to be relevant to the new Rushcliffe plan. In response to a FOI request, Rushcliffe Borough Council has stated:

"There are currently no studies/analyses to which Rushcliffe Borough Council has access to or it is preparing regarding the impact of Brexit on the number of new homes required in (a) Rushcliffe or (b) Greater Nottingham. The main determining factor for the number of new homes planned for is the household projections that are released by Government. The latest projections were released in July 2016 and are based on sub-national population projections, published by the Office for National Statistics in May 2016. These projections therefore take no account of the outcome of the referendum on 23 June 2016 or the events since that day."

It is widely considered that net migration rates into the UK will reduce as a result of Brexit. Indeed, recent statistics (to September 2016) demonstrate a significant fall in such net migration. We consider that it is inappropriate to build on additional green field sites when insufficient work has been done regarding future population estimates.

Rushcliffe Borough Council has applied the 20% buffer to both the 1000 per year housing requirement and the 882 home shortfall. It is not clear why this buffer has been applied to the shortfall when, in February 2015, the Inspector at the Oadby and Wigston appeal (APP/L2440/A/14/2216085) preferred to do the calculation in reverse order by considering the buffer then the backlog. Such an approach would reduce the requirement by 176 homes.

Moreover, there is a good argument that the under delivery is not "persistent" since the under delivery relates to large strategic allocations, some of which have been allocated less than three years ago, and the anticipated allocations in Part 2 have not yet been decided. Three years is a far shorter period than the Practice Guidance suggests should be considered in deciding the percentage to apply for the buffer since a longer view should be taken in order to have regard to economic cycles and market conditions. Development at the Edwalton allocation is clearly gaining momentum. Given the strong argument that the under delivery is not "persistent", rather it is due to slow starts at some larger sites, Rushcliffe Borough Council should apply a 5% buffer, despite having a shortfall, as per Kettering and Rother. It certainly seems perverse that the applied buffer is 1,176 homes when the projected shortfall is only 882. A buffer of 5% would represent only 17 additional homes, rather than 899.

The Local Plan Part 2 contains no justification of the decision to consider the 5 year supply for Rushcliffe alone, rather than considering the whole of Greater Nottingham, in line with the approach endorsed by the Inspector in the Christchurch and East Dorset Core Strategy examination.

# Housing Sites adjacent to the Main Urban Area

<b>Question 2</b> : Do you agree with the Council's view the allocations (Melton Road, Edwalton; South of Clifton; Tollerton) should be expanded as part of resolving the of land that is available for housing development over	and East one current s	of Gamston hortfall in th	/North of	
Yes			<b>√</b>	
No				
Don'tknow				
Please provide any comments you wish to make to s	upport you	r response.		
The current shortfall is as a result of the apparent failure at this time to secure the delivery of sufficient housing on strategic allocations within 5 years. Therefore, it appears that expanding the strategic allocations would not resolve this shortfall. Rather, more pressure should be applied to developers at those sites.				
Question 3: Do you support housing development at	t:			
	Yes – all of site	Yes – but only part of site	No	
Site HOL1 – Simkins Farm, Adbolton Lane, West Bridgford (potential capacity around 40 homes)				
Any other location (please specify which)				
Please provide any comments you wish to make to so could include comments on the services and facilities	• • •		This	

Click here to enter text.	
Housing Development at the 'Key Settlements'	
Bingham	
Question 4: Do you agree that Local Plan Part 2 should not allocate further	
greenfield land for housing development at Bingham in the plan period (up to	2028)?
Yes	
No	
Don'tknow	✓
Please provide any comments you wish to make to support your response.	
Having a train station and significantly more services and facilities (including schools) than the smaller villages also being considered for development at the Bingham appears to be more suitable for development. However, if no sites a been put forward that can deliver within the required five years, then we recognize that it would not be possible to allocate further sites for housing at Bingham a stage. There should be further exploration of appropriate land in Bingham to determine whether any additional site can be included in the SHLAA.	have gnise
Cotgrave	
<b>Question 5:</b> Do you agree that Local Plan Part 2 should allocate greenfield to housing development at Cotgrave in the plan period (up to 2028)?	and tor
Yes	$\checkmark$
No	

development and the design, mix and layout of development.

Don'tknow	
Please provide any comments you wish to make to support your response.	
Cotgrave is one of the larger settlements in Rushcliffe and has significantly reservices and facilities (including schools) than the smaller villages also being considered for development at this time. Although some development has a taken place in Cotgrave, the increase in currently planned housing is nowher of the same scale as that proposed in Tollerton, relative to the sizes of the settlements.	l Iready

**Question 6**: Do you have a view on the total number of new homes that should be accommodated on greenfield sites at Cotgrave up to 2028? If possible, please give reasons for your answer.

Cotgrave is one of the larger settlements in Rushcliffe. Cotgrave should expect to be required to provide a proportion of Rushcliffe's requirement for 13,150 houses that is proportional to its size and population. As a settlement, a large number of additional houses would cause less impact than if that same number of houses was built in a smaller village.

Question 7: Do you support housing development at:			
	Yes – all of site	Yes – but only part of site	No
Site COT1 – Land rear of Mill Lane/The Old Park (potential capacity around 240 homes)			
Site COT2 – Land at Main Road (potential capacity around 50 homes)			
Site COT3 – Land rear of and to the west of Main Road (potential capacity around 125 homes)			
Site COT4 Land off Woodgate Lane (potential capacity around 80 homes)			<b>√</b>

	Yes – all of site	Yes – but only part of site	No
Site COT5 – Bakers Hollow (potential capacity around 60 homes)			
Site COT6 – The Brickyard, Owthorpe Road (potential capacity around 100 homes)			
Site COT7– Land behind Firdale (2) (potential capacity around 65 homes)			
Site COT8 – Land behind Firdale (potential capacity around 95 homes)			
Site COT9 – Land south of Hollygate Lane (1) (potential capacity around 140 homes)			
Site COT10 – Land south of Hollygate Lane (2) (potential capacity around 40 homes)			
Site COT11 – Land south of Hollygate Lane (3) (potential capacity around 250 homes)			
Site COT12– Land south of Plumtree Lane (potential capacity around 250 homes)			<b>√</b>
Any other location (please specify which)			
Please provide any comments you wish to make to second include comments on the services and facilities development and the design, mix and layout of development.	s required t		This

It is important that new development should not lead to the merging of Cotgrave and Clipston and there would be a danger of this happening if COT12 was used for housing.

Similarly, COT4 is fairly near to the strategic allocation "East of Gamston/North of Tollerton". Whilst it is difficult to tell, given the current lack of plans for the strategic allocation, development on COT4 may be very visible from the strategic allocation and may increase the perception of merging of those settlements.

Development to the north and east of Cotgrave would be most appropriate, both to avoid merging of settlements and in terms of access to the A46.

East Leake
<b>Question 8</b> : Do you agree that, apart from those eight sites that already have planning permission for housing development (sites EL1 to EL8 as shown at Figure 5), further greenfield land should not be allocated for housing development at East Leake?
Yes
Don't know
Please provide any comments you wish to make in support of your response.
<ul> <li>We do not agree with the reasons put forward in Local Plan Part 2: Land and Planning Policies for not developing further in East Leake for the following reasons: <ul> <li>Whilst we recognise that East Leake has planning permission on sites that will deliver around 800 new homes, this is a relatively small number in relation to the size of East Leake in comparison with the planned 4000 new homes in the much smaller Tollerton (currently 850 households). Therefore, this argument can only be held valid if the same principle is also applied to areas like Tollerton which have even more houses planned.</li> <li>East Leake is not in the Green Belt.</li> <li>The location of East Leake is such that residents can access Nottingham via the upgraded A453 and have access to trams from Clifton and to East Midlands Parkway station. The A60 is less congested than the A606 and less congested than the A52 from the Wheatcroft Island to the Nottingham Knight Island. These factors make East Leake sites more suitable for development than the more easterly sites for which travel to Nottingham requires use of the congested A606 or Radcliffe Road.</li> <li>East Leake has better services and facilities (including schools) than the smaller villages that are also being considered for housing at this time.</li> </ul> </li> </ul>

Question 9: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No	
Site EL9 -Land south of West Leake Road (potential capacity around 50 homes)				
Site EL10 – Land north of West Leake Road (potential capacity around 75 homes)				
Site EL11 – Brook Furlong Farm(potential capacity around 70 homes)				
Site EL12 – Land off Rempstone Road (north) (potential capacity around 235 homes)				
Site EL13 – Land off Rempstone Road (south) (potential capacity around 120 homes)				
Site EL14 – Land north of Lantern Lane (2) (potential capacity around 360 homes)				
Any other location (please specify which)				
Please provide any comments you wish to make to support your answers. For any of the sites, this could include comments on the services and facilities required to support development and the design, mix and layout of development.				

#### Keyworth

**Question 10:** Do you have a view on the total number of new homes that should be built on greenfield sites at Keyworth up to 2028? If possible, please give reasons for your answer.

Keyworth is one of the larger settlements in Rushcliffe and has significantly more services and facilities (including schools) than the smaller villages also being considered for development at this time.

Keyworth should expect to be required to provide a proportion of Rushcliffe's requirement for 13,150 houses that is proportional to its size and population. As a

settlement, a large number of additional houses would cause less impact than if that same number of houses was built in a smaller village.

Question 11: Do you support housing development at:			
	Yes – all of site	Yes – but only part of site	No
Site KEY1 – Land east of Willow Brook (potential capacity around 40 homes)			
Site KEY2 – Land off Selby Lane and Willowbrook (potential capacity around 15 homes)			
Site KEY3 – Land south of Selby Lane (potential capacity around 60 homes)			
Site KEY4 – Land off Nicker Hill (potential capacity around 450 homes)			
Site KEY5 – Hill Top Farm, Platt Lane (1) (potential capacity around 50 homes)			
Site KEY6 – Hill Top Farm, Platt Lane (2) (potential capacity around 80 homes)			
Site KEY7 – Shelton Farm, Platt Lane (potential capacity around 160 homes)			
Site KEY8 – Land between Platt Lane and Station Road (potential capacity around 180 homes)			
Site KEY9 – Land north of Debdale Lane (1) (potential capacity around 110 homes)			
Site KEY10 – Land south of Debdale Lane (1) (potential capacity around 230 homes)			
Site KEY11 – Land south of Debdale Lane (2) (potential capacity around 200 homes)			

	Yes – all of site	Yes – but only part of site	No
Site KEY12 – Land north of Debdale Lane (2) (potential capacity around 160 homes)			
Site KEY13 – Hillside Farm (potential capacity around 60 homes)			
Site KEY14 – Land south of Bunny Lane (potential capacity around 410 homes)			
Any other location (please specify which)			

Please provide any comments you wish to make to support your answers. For any of the sites, this could include comments on the services and facilities required to support development and the design, mix and layout of development.

There is considerable congestion on the A606 towards the Wheatcroft roundabout and this needs to be taken into account in allocating sites for development.

The distance between nearby settlements would be reduced if the sites to the north-east (e.g. KEY7) are allocated due to the close proximity of Normanton-on-the-Wolds, albeit the two settlements are separated by the railway line and A606. There are no settlements close to the sites to the west of Keyworth and, if these sites were allocated, it would be easier for residents on such sites to access Nottingham via the relatively less congested A60.

#### Radcliffe on Trent

**Question 12**: Do you have a view on the total number of new homes that should be built on greenfield sites at Radcliffe on Trent up to 2028? If possible, please give reasons for your answer.

Radcliffe on Trent is one of the larger settlements in Rushcliffe and has significantly more services and facilities (including schools) than the smaller villages also being considered for development at this time. Importantly, Radcliffe on Trent has a train station which makes it more suitable for additional housing than many other settlements.

Radcliffe on Trent should provide a proportion of Rushcliffe's requirement for 13,150

houses that is proportional to its size and population. As a settlement, a large number of additional houses would cause less impact than if that same number of houses was built in a smaller village.

Question 13: Do you support housing development at:			
	Yes – all of site	Yes – but only part of site	No
Site RAD11 – North of Holme Lane (potential capacity around 115 homes)			
Site RAD12 – Land to the north of Shelford Road (potential capacity around 180 homes)			
Any other location (please specify which)			
Please provide any comments you wish to make to so of the sites, this could include comments on the service support development and the design, mix and layout	ices and fa	cilities requ	_
Click here to enter text.			

#### Ruddington

**Question 14:** Do you have a view on the total number of new homes that should be accommodated on greenfield sites at Ruddington up to 2028? If possible, please give reasons for your answer.

Ruddington is one of the larger settlements in Rushcliffe and has significantly more services and facilities than the smaller villages also being considered for development at this time. Residents in Ruddington can access Nottingham via the A60 which is much less congested (especially from Ruddington to the Nottingham Knight roundabout) at peak times than the A606 or the Radcliffe Road. Ruddington residents also have easier access to the tram from Clifton to Nottingham.

Ruddington should provide a proportion of Rushcliffe's requirement for 13,150 houses that is proportional to its size and population. As a settlement, a large number of additional houses would cause less impact than if that same number of houses was built in a smaller village.

Question 15: Do you support housing development at:			
	Yes – all of site	Yes – but only part of site	No
Site RUD11 – Old Loughborough Road (potential capacity around 40 homes)	<b>√</b>		
Site RUD12 – Land to the east side of Loughborough Road (potential capacity around 60 homes)	<b>√</b>		
Site RUD13 – Land opposite Mere Way (potential capacity around 170 homes)	<b>√</b>		
Site RUD14 – Croft House (potential capacity around 25 homes)	✓		
Any other location (please specify which)			
Please provide any comments you wish to make to support your answers. For any of the sites, this could include comments on the services and facilities required to support development and the design, mix and layout of development.  Sites with easy access to the A60 will have less congested road access to			
Nottingham than sites elsewhere in Rushcliffe.	,		

## Housing development at 'other villages'

Question 16: Do you agree that, apart from the site to the south of Abbey Road,

Aslockton with planning permission for up to 75 new homes, Local Plan Part should not allocate greenfield land for housing development at Aslockton and Whatton in the plan period (up to 2028)?	
Yes	
No	
Don'tknow	
Please provide any comments you wish to make in support of your response	·.
Click here to enter text.	

**Question 17**: Should Local Plan Part 2 identify the following 'other' villages as suitable for a limited level of housing growth on greenfileld sites?

	Yes	No	Don't know
Cropwell Bishop			
East Bridgford			
Gotham	✓		
Sutton Bonington	<b>√</b>		
Tollerton		<b>√</b>	
Any other settlement (please specify which)			

Please provide any comments you wish to make to support your answers.

The strategic allocation of 4000 houses has already been planned for Tollerton and this is already a disproportionately high number of houses for the parish. The Green Belt scores for sites TOL1 and TOL2 in Tollerton are particularly high and these sites should therefore be discounted. Travel to Nottingham from Tollerton is fraught with significant congestion and public transport is poor, particularly from the north end of the village.

Residents in Gotham and Sutton Bonington would be able to access East Midlands Parkway train station and the tram from Clifton. They would also have convenient access to the upgraded A453 and the M1.

#### **Cropwell Bishop**

**Question 18**: If greenfield land is allocated for housing development at Cropwell Bishop, do you have a view on the total number of new homes that should be built up to 2028? If possible, please give reasons for your answer.

Click here to enter text.

Question 19: Do you support housing development at:			
	Yes – all of site	Yes – but only part of site	No
Site CBI1 – Land to the south of Nottingham Road and east of Kinoulton Road (potential capacity around 30 homes)			
Site CBI2 – Land north of Memorial Hall (1) (potential capacity around 75 homes)			
Site CBI3– Land north of Memorial Hall (2) (potential capacity around 60 homes)			

	Yes – all of site	Yes – but only part of site	No		
Site CBI4 – Land north of Fern Road (2) (potential capacity around 30 homes)					
Site CBI5 – Land north of Fern Road (1) (potential capacity around 250 homes)					
Site CBI6 – Land to the north of Fern Road (3) (potential capacity around 70 homes)					
Any other location (please specify which)					
Please provide any comments you wish to make to support your answers. For any of the sites, this could include comments on the services and facilities required to support development and the design, mix and layout of development.					
Click here to enter text.					
East Bridgford					
<b>Question 20</b> : If greenfield land is allocated for housing development at East Bridgford, do you have a view on the total number of new homes that should be built up to 2028? If possible, please give reasons for your answer.					
Click here to enter text.					
Question 21: Do you support housing development at:					
	Yes – all of site	Yes – but only part of site	No		
Site EBR1 – Land behind Kirk Hill (east) (potential capacity around 15 homes)					

	Yes – all of site	Yes – but only part of site	No
Site EBR2 – Land behind Kirk Hill (west) (potential capacity around 70 homes)			
Site EBR3 – Land north of Kneeton Road (1) (potential capacity around 95 homes)			
Site EBR4 – Land north of Kneeton Road (2) (potential capacity around 150 homes)			
Site EBR5 – Land at Lammas Lane (potential capacity around 40 homes)			
Site EBR6 – Closes Side Lane (west) (potential capacity around 20 homes)			
Site EBR7 – Closes Side Lane (east) (potential capacity around 20 homes)			
Site EBR8 – Land to the north of Butt Lane (potential capacity around 20 homes)			
Site EBR9 – Land to the south of Springdale Lane (potential capacity around 30 homes)			
Any other location (please specify which)			
Please provide any comments you wish to make to so of the sites, this could include comments on the serve support development and the design, mix and layout	ices and fa	cilities requ	_
Click here to enter text.			

#### Gotham

**Question 22**: If greenfield land is allocated for housing development at Gotham, do you have a view on the total number of new homes that should be built up to 2028? If possible, please give reasons for your answer.

Click here to enter text.			

Question 23: Do you support housing development at:			
	Yes – all of site	Yes – but only part of site	No
Site GOT1 – Land to the rear of former British Legion (potential capacity around 25 homes)			
Site GOT2 – Land north of Kegworth Road/Home Farm (west) (potential capacity around 50 homes)			
Site GOT3 – Land north of Kegworth Road/Home Farm (east) (potential capacity around 20 homes)			
Site GOT4 – The Orchards, Leake Road (potential capacity around 50 homes)			
Site GOT5 – Land east of Gypsum Way/The Orchards (potential capacity around 200 homes)			
Site GOT6 – East of Leake Road (potential capacity around 45 homes)			
Site GOT7 – Land east of Hill Road (potential capacity around 160 homes)			
Site GOT8 – Land south of Moor Lane (potential capacity around 15 homes)			
Any other location (please specify which)			

Please provide any comments you wish to make to support your answers. For any of the sites, this could include comments on the services and facilities required to support development and the design, mix and layout of development.

The location of Gotham is such that residents can access Nottingham via the upgraded A453 and have access to trams at Clifton and to East Midlands Parkway train station. These factors make Gotham sites more suitable for development than the more easterly sites for which travel to Nottingham requires use of the congested

A606 or Radcliffe Road.				
Sutton Bonington				
<b>Question 24</b> : If greenfield land is allocated for housing development at Sutton Bonington, do you have a view on the total number of new homes that should be built up to 2028? If possible, please give reasons for your answer.				
Click here to enter text.				
Question 25: Do you support housing development a	at:			
	Yes – all of site	Yes – but only part of site	No	
Site SUT1 – Land north of Park Lane (potential				
capacity around 140 homes)				
capacity around 140 homes)  Any other location (please specify which)				
· · ·	ces and fa	cilities requ	_	

#### **Tollerton**

**Question 26**: If greenfield land is allocated for housing development at Tollerton, do you have a view on the total number of new homes that should be built up to 2028? If possible, please give reasons for your answer.

Mostly greenfield land has already been allocated for a housing development of 4000 houses in the parish of Tollerton. This is already a disproportionately high number, given the size of the existing community in Tollerton. No further greenfield land should be allocated. No further new homes should be built.

## **Question 27**: Do you support housing development at: Yes -Yes -No all of but site only part of site Site TOL1 - Land at Burnside Grove (potential capacity around 180 homes) Site TOL2 – West of Tollerton Lane and North of Medina Drive (potential capacity around 360 homes) Site TOL3 – Land east of Tollerton Lane (potential capacity around 50 homes) Any other location (please specify which)

Please provide any comments you wish to make to support your answers. For any of the sites, this could include comments on the services and facilities required to support development and the design, mix and layout of development.

#### TOL1, TOL2 and TOL3

We do not support development on any of these sites for the following reasons:

- At busy times, there is significant congestion on the A606 towards the Wheatcroft roundabout and on the Lings Bar Road approaching both the Wheatcroft roundabout and the Gamston roundabout. This situation will get considerably worse as the strategic allocation north of Tollerton is developed.

- Any additional houses in Tollerton would add to the delays. Please see the TASCforce consultation submission for further details of traffic matters arising.
- There is already too much traffic through Tollerton village. Tollerton Lane has a dangerous s-bend and is not designed for this level of traffic. School parking is a problem and safety is a real concern. Any additional houses in Tollerton would further increase the level of traffic and exacerbate the problems. Indeed, in the Local Plan Part 1: Rushcliffe Core Strategy, Inspector's Report (December 2014), the Inspector said "I recognise the deep concern about any increase in traffic on Tollerton Lane, as it is narrow with bends and undulations which limit forward visibility. It gives access to the local school for pedestrians and motor vehicles and is already badly congested in the peak hour."
- Significant numbers of additional houses would require another access out of the village and traffic to and from them should not be channelled down Tollerton Lane and residential roads.
- Within the next month or two, the volume of traffic in Tollerton is expected to increase significantly as the new hospital at the airport site opens. This hospital has 300 parking places. Over 120 employees, many contractors, inpatients and visitors, and day-patients will all travel to the hospital by car, since there is no public transport provision in that part of Tollerton. The impact of all this additional traffic is not understood and expected to cause considerable problems in the village. Adding more houses would exacerbate the traffic problems.
- Already residents living on Tollerton Lane find it very difficult to exit their drives at busy times. The lane is regularly grid-locked in the vicinity of the school.
- There is no provision for safe cycling in the area.
- There are no options in the area for non-road-based transport as there are no trains or trams in Tollerton. There has been a failure to provide footpaths, cycle paths and public transport for existing residents.
- Tollerton Primary School is already over-subscribed and class sizes exceed 30. This means that there would be insufficient school places in Tollerton for even a very small number of additional houses.
- There is already a shortage of secondary school places in this part of the borough.

#### TOL1 - Land at Burnside Grove

We do not support development on this site for the following reasons:

- This open countryside contributes to the rurality of Tollerton and, due to the slope of the land, any development would be visible over quite a distance to the north.
- TOL1 should remain in the Green Belt. It is contained within Zone 5.1 in the 2013 Green Belt Review which stated that Zone 5.1 "should ideally remain as Green Belt".
- The boundary to the north is not a defensible boundary since it is a weak hedgerow. It is important to have a defensible boundary to prevent future merging of Tollerton with Edwalton or with the new strategic allocation to the north.
- It appears that it would be difficult to access this site without demolishing existing houses.
- The number of houses proposed for this site is excessive due to the undulations in that area.
- Additional houses at this site would be likely to significantly increase traffic in the centre of the village and around the school.

TOL2 – West of Tollerton Lane and North of Medina Drive
We do not support development on this site for the following reasons:

- This site has higher Green Belt scores than any other of the additional key settlement sites or other villages sites. TOL2 is contained within Zone 5.1 in the 2013 Green Belt Review which stated that Zone 5.1 "should ideally remain as Green Belt".
- Development on this site would reduce the distance between Tollerton village and the new settlement to be built in the Strategic Allocation just north of this site, causing the two to almost merge contrary to the Inspector's recommendations.
- This is valuable open countryside that is an important characteristic of Tollerton old village.
- The land on this site rises such that it is visible from a significant distance away.
- Tollerton old village has a rich history and the setting and special character of this part of Tollerton would be spoilt by development on TOL2. In the immediate vicinity, in the old village, are Tollerton Hall and 6 listed buildings including the Church (with current foundations dating back to the 12<sup>th</sup> century), the Old Rectory (rebuilt between 1697 and 1702) and Bassingfield House, and 8 local interest buildings. The northern lodge (1824) to the Hall is on Cotgrave Lane, and the edge of the built village includes North End Cottages, built between 1833 and 1847 by Pendock Barry Barry, the then squire of the village, as accommodation for villagers with a further building used as a school. Those buildings retain distinctive features of the estate design at that time and an architectural coherence on the edge of the village. The history of Tollerton is an important focus of the Tollerton community, which has a thriving History Group.
- Evidence (Pendock map, Throsby's drawing, Potter's nineteenth century plan and field names and the current position of rights of way) all strongly suggest that the Tollerton mill, certainly from 1683 and possibly from the twelfth century was sited in TOL2 on the slope of the hill on which Jubilee Wood now stands. The site is at or close to National Grid Reference SK 6125 3504. There are few identifiable mediaeval or early modern archaeological sites in Tollerton, so this monument is clearly of considerable importance to the village. Mill sites, close to mediaeval communities, but not now built over are rare. Together with the fact of its final burning, its remains should be identifiable by geophysical examination and would certainly merit archaeological excavation. An application has been made to have this included in the Historic Environment Record.
- The older parts of the village (adjacent to TOL2) retain the church, the village war memorial and social activities in the parish rooms including parent and toddler groups, which are used by all the village. The site of the village pinfold has recently been marked by a rebuilding. Tollerton has its own unique identity which would be lost if development went ahead on TOL2.
- As the Inspector recommended as recently as December 2014, TOL2 should not be removed from the Green Belt. Much of the western boundary and part of the eastern boundary consist of weak hedgerows, which would not form defensible Green Belt boundaries.
- The southern part of TOL2 provides a visual gap between the old village and the new village. Development of this part of TOL2 would spoil the setting of the old village by merging it with the newer part of Tollerton village.
- There is a possibility that development on this site could cause flooding issues in Tollerton old village, given the proximity of the flood plain to the east of the

- old village. This would need investigation.
- TOL2 is next to the old village which is very poorly served by public transport. Buses are unreliable and run no more than once an hour, with the latest bus leaving Tollerton before 5.30pm and with no buses on Sundays.
- There is no provision for safe cycling from TOL2 and pavements from the old village to the new village are very poor in places. There are no pavements going north from TOL2 to Gamston.
- There are no shops and very few facilities or services in the old village.
- TOL2 is in close proximity to Jubilee Wood which is home to a variety of wildlife, including bats, and it would not be appropriate to build on this site since this would jeopardise an island of natural habitat of which there are very few so close to the city.
- TOL2 contains part of a footpath giving access to countryside walking and such access should not be lost.

In the Rushcliffe Core Strategy, Inspector's Report (December 2014), the Inspector stated: "I have concerns about the potential effects of bringing development closer to Tollerton", "With provision for 4,000 new homes altogether up to 2034, I see no need for safeguarding additional land and removing it from the Green Belt in this part of the Borough". So development on TOL2 would not be consistent with the Inspector's views.

#### TOL3 - Land east of Tollerton Lane

We do not support development on this site for the following reasons:

- Open countryside is an important characteristic of Tollerton as a rural village. Building on this site would remove the extensive views of open countryside from a relatively long stretch of Tollerton Lane for the gain of relatively few houses.
- The fields to the east of this site are visible over a wide area in several directions.
- This site does not have defensible boundaries and so should not be removed from the Green Belt.
- It would be difficult and would be out of character with existing building to build houses other than as a single row. This reduces the number of houses possible.
- Part of this site is owned by a landowner who has not been consulted as to whether he wants development on his land. If not, the land available for housing reduces further.
- Part of this site is required to remain as an access to the field to the east of the side. This reduces the land available for housing.
- This site contains part of a footpath giving walking access to the countryside and such access should not be lost.
- Whilst we do not support housing development on TOL3, if any such development was to go ahead, it should be a single row of affordable ecohomes, in keeping with neighbouring properties.

#### Other issues

**Question 28**: Please identify any matters related to housing development which are not covered here or elsewhere.

1. Residents have been misled regarding process and consultation. EX41 –Local Plan Part 1: Rushcliffe Core Strategy, Schedule of Proposed Modifications (Version 2) to the Publication Rushcliffe Core Strategy, February 2014, Policy 3,3.1.3.6 stated that "The strategic review recommends where a more detailed review of the Green Belt should be undertaken. A more detailed review has been produced around the main built up area of Nottingham within Rushcliffe. A more detailed review around other settlements, in accordance with the approach identified in parts 3 to 6 of Policy 3, will take place in support of the Local Plan Part 2 (Land and Planning Policies)."

Thus we were told that the more detailed review would be around OTHER settlements and we responded to consultations under the assumption that the Green Belt status of settlements that had already been reviewed would not be reviewed again for Part 2. To now review the same area (Zone 5.1 of the 2013 Green Belt Review) a second time is inappropriate since this is not consistent with the approach that Rushcliffe Borough Council said would be taken. Thus residents were misled at previous consultations, namely for Local Plan Part 1 (2013/14) and Local Plan Part 2: Land and Planning Policies (January 2016).

Under the approach that Rushcliffe Borough Council laid out, which was a basis for the process that was the subject of consultation, sites within zones reviewed in the 2013 Green Belt Review which were not removed from the Green Belt as a result of that review should not now be considered for new housing within Part 2.

- 2. The approach and consultation treatment of sites is inconsistent. The piecemeal fashion in which sites have been put forward for consultation has resulted in residents not being properly consulted on certain sites and has also resulted in inconsistencies. The consultation documents for the Local Plan Part 2 (January 2016) requested responses for particular sites for new housing on the edge of the key settlements of East Leake, Keyworth, Radcliffe on Trent and Ruddington in relation to the need for 1,100 new homes. The responses, and decisions as to whether to respond, were based on this number and not on the new figure of 2,000 new homes. Given that the figure has now increased, it is inconsistent not to consult on reviews of all these sites again (both for housing development and Green Belt status) while consulting on Zone 5.1 for a second time.
- 3. Safeguarded sites have not all been re-considered in Part 2. It is inconsistent that Zone 5.1 which remained in the Green Belt following the 2013 Green Belt Review has been put forward as an option for development in Local Plan Part 2 (Further Options) (February 2017) whereas Edwalton Golf Course which was designated as safeguarded land, removed from the Green Belt for development in the future (to "aid the 'permanence' of the Green Belt, and prevent the need for further early review of its boundaries" (EX41)) has not been considered in Part 2 (Further Options). We are aware that the 10 year management contract with Glendale Managed Services Limited was extended until 30 November 2017. It should be possible to build on this site within 5 years, even if a buyout is required in relation to any further extension.

In relation to this safeguarded land, EX41 stated: "While the land is not required for development at the present time, should this situation change it may be brought forward through a future review of the Local Plan".

Alternative golfing provision could be provided in the Green Belt, since golf courses are an acceptable Green Belt development

4. Identification of additional settlements did not take proper account of the Tribal Study.

Local Plan Part 2: Land and Planning Policies, Identification of Additional Settlements Background Paper (February 2017) "examines the sustainability of the other villages beyond those key settlements that are part of the settlement hierarchy contained within the Core Strategy. It seeks to identify those villages where additional houses could be accommodated. This is based on: the conclusions of the Greater Nottingham Accessibility Study (2010) and the Greater Nottingham Sustainable Locations for Growth Study (2010); and a further assessment of existing community services and facilities as at 2017."

In terms of identifying further sites for additional houses, paragraphs 49 and 50 are flawed in that they state that "The Tribal Study concludes that overall, Tollerton potentially is suitable for low-medium levels of growth ...".

However, these Tribal Study conclusions do not relate to the areas of Tollerton being considered in Part 2. Rather, they relate to the larger area RM01 considered in the 2010 Tribal Study. Furthermore, that Tribal Study stated that the "potential direction of growth" was "Northeast". Whilst the maps in that study are poor, this might relate to the area of the strategic allocation North of Tollerton. It certainly does not relate to the areas of Tollerton considered in Part 2 since the Tribal Study goes on to state "Avoid northwest, west, southeast and south".

This conclusion of the Tribal Study was understood in the 2013 Green Belt Review which stated "None of this zone identified as potentially suitable for development by Tribal Study" in relation to Zone 5.1 of that review which contains sites TOL1 and TOL2. Therefore it was wrong and misleading to make mention of the Tribal Study conclusions "suitable for low-medium levels of growth" when the areas of Tollerton to be considered for additional housing were not those being referred to by that part of the Tribal Study.

The Identification of Additional Settlements Background Paper (February 2017) should have ruled out Tollerton.

5. Councillor Debbie Mason misled Tollerton residents during the Local Plan (Part 1) process.

Before the Public Inquiry, Cllr Mason (December 2013) told Tollerton residents that it was important for the strategic allocation north of Tollerton to be approved as part of the Local Plan because this would provide "a defence against uncontrolled and unwanted applications around the edges of Tollerton" and that then "the rest of Tollerton is protected". It seems now that the strategic allocation has been approved and yet the rest of Tollerton is not protected. Cllr Mason's comments can now be seen as misleading and may have affected how/whether residents responded to the "Matters, Issues and Questions" for the Examination.

6. The total housing requirement is 13,150 and sites are now being identified for 1,100 of these houses around Key Settlements plus an additional 899 houses around Key Settlements and elsewhere. There are 98 different sites being considered and these sites could, in theory, accommodate 12,186 new houses. Given that the total housing requirement for Rushcliffe is 13,150 and Tollerton is a settlement of just 850 households and has already been allocated 4000 new houses, it would be unjust to allocate any further houses in Tollerton, especially given the

availability of sites in and around other settlements.

- 7. Given the high Green Belt scores in Tollerton and lower scores for sites in other settlements, the number of alternative sites available mean that exceptional circumstances are very unlikely to exist to justify removal of the Tollerton sites from the Green Belt for development.
- 8. The proposed sites in Tollerton should not be removed from the Green Belt (please see the TABU response to the Green Belt Review 2017):
  - The proximity of TOL1 and TOL2 to the approved strategic allocation North of Tollerton makes these sites non-starters for development due to coalescence with that allocation.
  - The relatively small number of houses that could be sensibly accommodated on TOL3 for loss of a relatively long area of extensive views of important open countryside makes TOL3 unsuitable for development.
  - The open countryside north of Burnside Grove contributes to the rurality of Tollerton and, due to the slope of the land, any development would be visible over quite a distance to the north. Therefore this part of the Green Belt must be retained to prevent unrestricted and conspicuous sprawl.
- 9. Some SHLAA sites are located beyond the built-up area of the settlement within the Nottingham and Derby Green Belt, in a location where the Core Strategy identifies that growth will be to satisfy local need and this need will be primarily met through infill and rural exception development. The supporting text to policy 3 of the Core strategy states that where small-scale allocations are appropriate to provide further for local needs, these will be included in Local Plan Part 2. It is not clear why some such SHLAA sites (e.g. site ref. 637) are now being considered for additional housing and others (e.g. in Bunny) are not. Bunny has a half hourly bus service, whereas the local bus service near site ref 637 is only hourly and does not run during evenings and Sundays. Like Bunny, Tollerton has no doctor's surgery. Site 637 (near Little Lane) is 25 minutes' walk from a post office. The Identification of Additional Settlements Background Paper (February 2017) states that Tollerton has a primary school, but fails to take into account that it does not have any spare capacity for additional pupils. The Identification of Additional Settlements Background Paper (February 2017) does not give reasoned justification for identifying Tollerton as suitable for further housing, but not Bunny. The reasoning in this paper should be re-examined.

Please return by 5pm on Friday 31 March 2017 to:

Planning Policy Rushcliffe Borough Council Rushcliffe Arena Rugby Road Nottingham. NG2 7YG

Or to: localdevelopment@rushcliffe.gov.uk

Please note that your comments can be directly entered through the Borough Council's online consultation system: http://rushcliffe-consult.objective.co.uk/portal

**Data protection:** The details you submit to the Borough Council will be used in the Local Plan preparation and associated processes. Please note that comments and personal details <u>cannot</u> be treated as confidential and may be made available for public inspection both physically and/or through the Borough Council's website. We may publish all names, addresses and comments received, including on our website. We will use our best endeavours to not publish signatures, personal telephone numbers or email addresses.



# Rushcliffe Green Belt Review Part 2 (b) – Additional Sites (Draft for consultation)

# **Response Form**

Your Details		Agent details (where applicable)
Tollerton Against Backdoor Urbanisation (TABU):	Name	
TABU is a campaign group working to preserve the rural nature of Tollerton as a village.		
TABU represents a large membership of Tollerton people.		
This document is submitted on their behalf.		
Secretary: Hazel Salisbury 165 Tollerton Lane Tollerton Nottingham	Address	
TollertonTABU@gmail.com	E-mail	

#### 1. Green Belt Review Part 2 (b): Additional sites review

Do you agree or disagree with the review of the additional Green Belt sites around Rushcliffe's Key Settlements and other villages against the purposes for including land within the Green Belt? If you disagree, state why the assessment is incorrect and provide your Green Belt score and conclusions on Green Belt importance. Your comment should focus on the land's performance against Green Belt purposes.

TOL1 has been assessed as having a Green Belt score of 21, indicating high importance to the Green Belt. Indeed, this is the highest score of all land considered in the January 2016 and February 2017 Green Belt Reviews. We agree with this assessment other than that the score for "Preserve setting and special character of historic settlement" should be 5, not 4:

Evidence (Pendock map, Throsby's drawing, Potter's nineteenth century plan and field names and the current position of rights of way) all strongly suggest that the Tollerton mill, certainly from 1683 and possibly from the twelfth century was sited in TOL1 on the slope of the hill on which Jubilee Wood now stands. The site is at or close to National Grid Reference SK 6125 3504. There are few identifiable mediaeval or early modern archaeological sites in Tollerton, so this monument is clearly of considerable importance to the village. Mill sites, close to mediaeval communities, but not now built over are rare. Together with the fact of its final burning, its remains should be identifiable by geophysical examination and would certainly merit archaeological excavation. An application has been made to have this included in the Historic Environment Record. This historical site was not taken into account in the Green Belt Review.

Certainly, the Green Belt score for "Preserve setting and special character of historic settlement" for TOL1 should be no lower than that for RUD12 (which is 5) since Tollerton Hall, like Easthorpe House, is a Grade II listed building for which the surrounding land forms the setting. Whereas RUD12 has only Easthorpe House in the vicinity, TOL1 has a further 6 listed buildings in close vicinity as well as 8 local interest buildings.

TOL2 has been assessed as having a Green Belt score of 18. Out of all sites considered in the January 2016 and February 2017 Green Belt Reviews, only TOL1 has a higher Green Belt score. We agree that this land is

important to the Green Belt. However, the score for "Prevent merging of settlements" should be 5, not 4, since the site is very close to the new strategic allocations and the northern boundary of the site is neither robust nor defensible.

In addition to being part of an area of arable farmland landscape, the northern end of TOL3 is in close proximity to a wooded area called "The Decoy", which lies adjacent and to the west of Tollerton Wood. These features are both natural habitats and mark historical boundaries in relation to the Tollerton Estate which contains Tollerton Hall (as documented on the 1928 map from the sale particulars of Tollerton Estate, as well as in much earlier maps). It is important to protect the setting of this natural habitat from development on TOL3. This has not been taken into account in the scoring of "Assist in safeguarding the countryside from encroachment", suggesting that this score should be increased from 3 to 4 for TOL3. These features also need to be taken into account in the score for "Preserve setting and special character of historic settlement".

The gap between TOL3 and the historic core of Tollerton, including St Peter's Church (with current foundations dating back to the 12<sup>th</sup> century), the Old Rectory (approx. 1700) and Tollerton Hall and the lake, is important to preserve the setting and character of that historic core. Therefore it is important to prevent development that causes the older and newer parts of Tollerton to merge. The score for "Preserve setting and special character of historic settlement" should be increased from 1 to 5, particularly in light of the fact that TOL3 has no defensible boundary to the north. This would be consistent with the equivalent score for RUD12 which is adjacent to Easthorpe House and which, like Tollerton Hall, is a Grade II listed building for which the surrounding land forms the setting.

The current boundary of TOL4 prevents urban sprawl due to the topography of the site. Therefore the score for "Check unrestricted sprawl of settlements" should be 4, not 3.

Paragraph 85 of the NPPF states that when defining boundaries, local planning authorities should "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent".

- TOL1 has weak hedgerows to the southern and eastern boundaries. Only half of the western boundary is robust.
- TOL2 has weak hedgerows to the north and west.
- TOL3 has no physical feature for its external southeast boundary and has a weak post and wire fence for its northern boundary.
- TOL4 has weak hedgerow as its external boundary to the north-west.

So none of these sites have boundaries that are clearly defined using physical features that are readily recognisable and likely to be permanent. Replacing Tollerton Lane as a boundary with weak hedgerows or no recognisable physical features is not consistent with paragraph 85 of the NPPF.

(please continue on a separate sheet if necessary)

#### 2. Please provide any others comments you wish to make

1. Within our 2014 consultation response and at the Core Strategy Examination, TABU objected to the piecemeal review of the Green Belt. This continues to cause problems and inconsistencies.

The Green Belt Review (February 2017) reviews sites TOL1, TOL2 and TOL4 which are all contained in Zone 5.1 which was reviewed in the Green Belt Review (2013). This zone is also within the area reviewed in the Green Belt Review (2006).

- In each case, the Green Belt has been divided into different sizes and shapes of land this is not a
  consistent approach in terms of consideration of the relative importance of different parts of the
  Green Belt. Those sites that are reviewed more times are more likely to be removed from the Green
  Belt, especially if they are reviewed differently each time.
- The frequency of review of the same parcels of land is not consistent with paragraph 83 of the NPPF that states "authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period". It is inconsistent with this to alter the Green Belt boundaries within Zone 5 of the Green Belt Review 2013 in December 2014 and then to review and possibly seek to alter them again in 2017.
- The 2013 Green Belt Review stated that Zone 5.1 "should ideally remain as Green Belt". It would be perverse to remove land within that zone from the Green Belt so soon after deciding to retain it as Green Belt.
- 2. Residents have been misled regarding process and consultation.

The Rushcliffe Green Belt Review – Part 1 and 2a (November 2013) explained the process of review and which areas would be considered at each stage of the process. It stated that "More detailed changes around Key Settlements in or adjacent to the Green Belt (Bingham, Cotgrave, Keyworth, Ruddington and Radcliffe on Trent) and a review of possible minor adjustments around other villages inset from the Green Belt will take place at a later date in support of the second part of the Local Plan". Similarly, Local Plan Part 1: Rushcliffe Core Strategy – Green Belt Background Paper (EX34, February 2014) stated that Part 2(b) "will focus upon other settlements with Rushcliffe". So it was made very clear that Part 2(b) would focus on different areas from the 2013 Green Belt Review. Tollerton is being treated differently from other areas in that Zone 5.1 was reviewed in 2013 and it is being reviewed again in 2017 with a new consultation in the light of increased housing requirements. Other sites (e.g. those considered in 2016) are not being subjected to a second consultation in the light of these changes. We contend that sites previously consulted upon as a result of their inclusion in the 2013 Green Belt Review should not be consulted on again unless all previously reviewed sites (from 2013 and 2016 reviews) which still have available housing land are also consulted upon again.

- 3. In the Rushcliffe Core Strategy, Inspector's Report (December 2014), the Inspector stated: "I have concerns about the potential effects of bringing development closer to Tollerton", "With provision for 4,000 new homes altogether up to 2034, I see no need for safeguarding additional land and removing it from the Green Belt in this part of the Borough". So removal of further Green Belt in Tollerton would not be consistent with the Inspector's views.
- 4. The proposed sites in Tollerton should not be removed from the Green Belt:
  - The proximity of TOL1 and TOL2 to the approved strategic allocation North of Tollerton makes these sites non-starters for development due to coalescence with that allocation.
  - The relatively small number of houses that could be sensibly accommodated on TOL3 for loss of a relatively long area of extensive views of important open countryside makes TOL3 unsuitable for development.
  - The open countryside north of Burnside Grove contributes to the rurality of Tollerton and, due to the slope of the land, any development would be visible over quite a distance to the north. Therefore this part of the Green Belt must be retained to prevent unrestricted and conspicuous sprawl.

(please continue on a separate sheet if necessary)

Please return by 5pm 31 March 2017

to: Planning Policy
Rushcliffe Borough Council

Rushcliffe Arena Rugby Road West Bridgford Nottingham NG2 7YG

Or to: <a href="mailto:localdevelopment@rushcliffe.gov.uk">localdevelopment@rushcliffe.gov.uk</a>

Please note that your comments can be directly entered through the Borough Council's online consultation system: <a href="http://rushcliffe-consult.objective.co.uk/portal">http://rushcliffe-consult.objective.co.uk/portal</a>

**Data protection:** The details you submit to the Borough Council will be used in the Local Plan preparation and associated processes. Please note that comments and personal details <u>cannot</u> be treated as confidential and may be made available for public inspection both physically and/or through the Borough Council's website. We may publish all names, addresses and comments received, including on our website. We will use our best endeavours to not publish signatures, personal telephone numbers or email addresses.

# Tollerton Against Speeding Campaign (TASCforce) response to: Rushcliffe Local Plan Consultation Green Belt Review Consultation Community Infrastructure Levy Consultation

- TASCforce is responding on behalf of Tollerton village regarding traffic matters that arise from the above consultation document.
- We do not consider the proposals to be sound.
- We reject the proposed Local Plan because of the significant impact increased traffic will have on the village given existing proposals for development East of Gamston / North of Tollerton .
- The Plan will increase existing traffic problems well known to the Highways Authority.
- Our views are largely unchanged from when we gave evidence to the Government Inspector about the East of Gamston/ North of Tollerton development.

#### **Background**

Tollerton has a long history of campaigning to secure a safe environment. The Tollerton Against Speeding Campaign – (TASCforce) was established as a sub group of the Parish Council in June 1996. This was in response to growing concerns about traffic issues in the village in particular speeding along Tollerton Lane. The aims of the group were to:

- reduce the excessive speed of some drivers through the village this remains an issue.
- reduce the number of heavy goods vehicles using our lanes since the weight restriction this has improved.
- reduce the increasing amount of traffic through the village this is still relevant.

#### Key safety measures secured through negotiation and lobbying with NCC.

Widening the footpath and erection of safety barrier around the S Bend on Tollerton Lane, Development of a connecting footpath along the full length of Cotgrave Lane, Installation of interactive speed signs at each end of the village, Gateway signs at both entry points to the Village on Tollerton lane Community Speed Watch team established.

Speed reduction along Cotgrave Road from 60 mph – 40 mph
Speed Reduction along part of Cotgrave lane from 60 mph – 30 mph
Weight restriction throughout the village
Lorry Watch team established

#### **Our Rationale**

All technical documents TASCforce has had access to when considering the East of Gamston / North of Tollerton proposed development confirmed our view that whilst a range of mitigation measures were included in the Plan they are woefully inadequate to address the impact of a significant increase in domestic and commercial traffic going through Tollerton village. The Rushcliffe Local Plan will add to pre-existing traffic problems previously articulated. Notably roads in Tollerton are narrow with dangerous bends, for example the double bend on Tollerton Lane and the bend on Cotgrave Road, the site of a number of fatal accidents in recent years.

We have considered the wider implications for Tollerton of the Local Plan which does not appear to have recognised or addressed the impact of additional housing on Tollerton village. Whatever "mitigation measures" are adopted either as part of the East of Gamston / North of Tollerton development or the Local Plan traffic will continue to build up in Tollerton at peak periods and be funnelled into either the Melton Road or Radcliffe Road both of which are single carriageway, residential. In addition the three River Trent crossings are also all at capacity during peak periods.

TASCforce has worked on behalf of the village over a considerable period of time to ensure residents and those using our lanes are safe. Our knowledge of local traffic issues leads us to reject the proposed Local Plan. We accept attempts were considered as part of the East of Gamston / North of Tollerton development but our view remains these are inadequate to mitigate the impact of increased traffic on key primary roads notably, the A52 and A606 which will be considerable. The additional housing proposed as part of the Local Plan will create further severe difficulties for Tollerton residents entering and leaving the Village as well as using key roads through the village in particular the two side roads onto Tollerton Lane - Burnside Grove and Medina Drive.

A traffic count undertaken by residents in 2007 over a 12 hour period 0630-1830 showed 7798 vehicles negotiating the Cotgrave Road / Cotgrave Lane junction and 2029 using Cotgrave Lane.

A further survey undertaken in March 2014 demonstrated traffic volume has increased by 47% (on Cotgrave Lane) to 2982. This suggests about a further 12% increase in traffic negotiating the junction at the Cotgrave Road / Cotgrave Lane Junction. A total of 4585 vehicles travelled through the area proposed for development, in both directions past Nottingham Airport on Tollerton Lane.

The March 2014 survey confirmed an absence of HGVs during the survey hours due to the Environmental Weight Limit and the volunteer Lorry Watch Scheme. Our concerns persist however regarding a likely increase in HGVs to and from the new developments , which will further destroy the environment, create traffic blockages, and create disturbance at night for residents living close to the road. There is no policy proposed to manage acknowledged traffic increases and congestion or prevent heavy goods vehicles using village roads which disrupt village life.

#### **Planning Director's Report**

It was acknowledged during the East of Gamston/ North of Tollerton government Inspectors hearing re Tollerton that there are limitations "in connecting with the rest of Gamston, meaning that it will have to function more as a standalone urban centre than would ordinarily be the case for an urban extension".

**Paragraph 55** of the Inspectors report states "There is a need for new transport infrastructure and traffic management measures to ensure that accessibility and connectivity with Gamston is achieved **and that the adverse impacts of additional traffic on Tollerton Lane and Cotgrave Lane can be mitigated**. The Council proposed modifications to the Plan to reflect work undertaken in 2014 with the transport authorities, as described in the Transport Background Paper Further Addendum [REX53]. The modifications show that two accesses should be provided from the site to the A52(T) Gamston Lings Bar Road, and that improvements would be needed to the A52 with a financial contribution from developers. I recommend **MM15(b) & (h)** to secure good connectivity with the existing built up area to the west **and reduce the propensity for rat-running through Tollerton."** 

The Government Inspectors report states at **paragraph 116** "I recognise the deep concern about any increase in traffic on Tollerton Lane, as it is narrow with bends and undulations which limit forward visibility. It gives access to the local school for pedestrians and motor vehicles and is already badly congested in the peak hour. Providing two accesses to the site and carrying out additional transport assessment should prevent a major increase in traffic through Tollerton onto the A606, as feared by many local people. Proposed modifications MM15(g), (h) & (i) should be made to reflect the Council's changed position as agreed with the Highways Agency. paragraph 83 of the Government Inspectors report also sates, "The Green Belt Review 2013 reached a different conclusion from the earlier Tribal Studies regarding broad location 5 where the strategic allocation East of Gamston/North of Tollerton is proposed. ED06 found that a sustainable urban extension here could contribute to unrestricted sprawl as it would extend beyond the A52. **However, as described in paragraph 54 above, defensible boundaries can be established and the risk of coalescence with Old Tollerton avoided.** Differences in conclusions between the two studies are based on reasoned judgments and do not invalidate the Local Plan".

The Government inspector also stated at **Paragraph 54**, "As for the other sustainable urban extensions, I agree with the Council that the need for new housing and economic development in Rushcliffe provide the exceptional circumstances for altering the tightly drawn Green Belt boundary in the Borough. The site which contains Nottingham (Tollerton) Airport with its runways and prominent buildings is not wholly open countryside. Development here provides the opportunity to re-use brownfield land at the airport. Polser Brook and Grantham Canal provide potential defensible boundaries to the north and east. **Structural planting could be used to create a strong green edge limiting the visual impact of new development, as the land is relatively flat. The proposed site would be physically and visually separate from Tollerton and Bassingfield villages, providing such measures were taken".** 

#### Current traffic issues of concern to residents in Tollerton -

- 1. Congestion at exits from the village onto the A606 and A52 at peak traffic periods A606 it is currently extremely difficult to safely turn right onto the A606 from any village exit point, other than Tollerton Lane, during the two daily traffic peak times. The queue at peak times to exit via the lights on Tollerton Lane is usually 300 yards long (6-8 minutes). A 52 crossing a dual carriageway during peak traffic periods is both time consuming and unsafe due to restricted visibility.
- 2. Congestion along Tollerton Lane at the beginning and end of the School day. Cars parked along both Tollerton Lane and Burnside Grove pose a road safety risk especially to young children entering and leaving the play group because of the number of parked cars. This has not been alleviated by the new 20 mph zone.
- 3. Whilst there is a reasonable public transport service along Melton Road there is a lack of adequate public transport through the village.
- 4. There is an increasing number of cyclists using the lanes through Tollerton. The lack of illuminated cycle lanes is a safety hazard for both cyclists and drivers. There is no mention of any cycle lanes as part of the proposal
- 5. The lack of illuminated footpath along the length of Tollerton Lane remains a concern . There is no mention of any footpaths in the Local Plan .
- 6. No action has been taken to provide an effective traffic calming system in the village, despite the fact that traffic was highlighted as a serious concern when giving evidence to the Inspector about the East of Gamston / North of Tollerton development.
- 7. There is still no safe place for children (travelling south along Tollerton Lane) to wait for school buses. They continue to wait on the grass verge opposite Burnside Grove. There is no footpath on this side of the road.
- 8. Village lanes are unsuitable for high levels of traffic and HGV usage. NB there is still a lack of warning signs on the A52 that Tollerton has an Environmental Weight Limit (EWL)
- 9. An inherent safety risk due to increased traffic on double bend in Tollerton Lane and sharp bends on both Cotgrave Lane and Cotgrave Road.
- 10. Considerable difficulty to turn right out of Cotgrave Lane onto Cotgrave Road, due to poor visibility to the left because of the hump in Cotgrave Road, the amount of traffic and the speed of traffic.
- 11. Increasing Traffic through the village.

#### Issues of concern arising from the Local Plan

- **1.** Heavy Goods / commercial Vehicles The impact of building on any of the proposed sites for development will once again increase the number of Lorries using narrow lanes designated as secondary access routes. Access to each of the four proposed sites will mean HGVs going through the village. It is difficult to see how a similar scheme to the one currently in place for the Spire Hospital could be adopted.
- **2. Junction revision** The proposed revised junction at the South end of Tollerton Lane / A606 was in our view wholly inadequate when considering the impact of increased traffic as a result of the East of Gamston/ North of Tollerton development. The impact of additional housing so close to the village will add to the problem which cannot be resolved by altering the junction. In our view this only serves to encourage an increase of vehicles through the village and would do nothing to stop heavy vehicles or the flow of cars using the route as a "rat run".
- 3. Congestion The increase in traffic congestion along the A52 and A606 will result in more "rat run" traffic through Tollerton. There was good evidence of this in the SYSTRA document Highway Mitigation Ref number 102545. (EX 45 GNCS) states para 3.3.6 under the sub heading Congestion "notable increases occur at the following locations:

  A60 / A52 Nottingham Knight signalised approach from Ruddington

  A606 / Tollerton Lane Junction

  Tollerton Lane/ Cotgrave Lane"

In the Revised Rushcliffe Assumptions document reference number 102545 (EX 44 GNCS) it also stated at paragraph 6.26 that "significant increases in traffic are also predicted on the ring road and along the A52 to the south of West Bridgford, partly due to the strategic developments at Gamston, Edwalton and the Boots site".

We found additional evidence of likely increased traffic congestion in the SYSTRA document – Technical Note Gamston Sensitivity Testing (EX 46 GNCS) at para 3.4.2 "the increase in congestion associated with the additional Gamston development traffic has pushed the VC/ratio beyond 85% at the following locations:

Nottingham Knight junction (A52 eastern approach)
Tollerton lane / Cotgrave Lane"

We also noted the statement in the Transport Background Paper Addendum – Local Plan Part 1: Rushcliffe Core Strategy (EX 47) paragraphs 6.11 and 6.12 which suggest "Smarter choices, Public Transport and highway mitigation measures on the strategic route network only partially mitigate the impacts of the Core Strategies proposals and congestion levels still increase compared to the reference case".

In the same document at paragraph 7.6 there is an indication that even with all the suggested mitigation measures there is "a limited opportunity to address this through further increased capacity with the effect that, even with the highway mitigation schemes currently proposed, traffic demand from the development will not be able to be fully accommodated on the network

without significant reassignment of traffic away from the A52 (T) A6011 route". Without adding further to the burden of traffic on the secondary roads / lanes through the village it is hard to understand where exactly traffic can be reassigned to.

NB it is accepted at paragraph 7.8 that the A52 (T) is an "already congested situation". In our view both the East of Gamston/ North of Tollerton Plans and the Local Plan fail to take account of existing traffic problems in Tollerton or of traffic problems on surrounding roads.

**4.** *Peak periods* - Significantly in the Revised Rushcliffe Assumptions document (EX 44 GNCS) it states at paragraph 6.2.7 "In the evening peak, there is an increase in traffic along roads through Cotgrave and Tollerton Lane as traffic seeks to find alternative routes to avoid congestion". This will worsen if further development goes ahead without existing problems being recognised and addressed.

The accumulative effect of developments around Tollerton for example; Cotgrave, Edwalton, Newton, Ruddington and Keyworth, will have a considerable impact on residents living in Tollerton using primary feeder roads.

In the SYSTRA Document – Revised Rushcliffe Assumptions Ref Number 102545 (EX 44 GNCS) Paragraph 3.2.5 it was stated that "commuting times will increase by 5% as a result of the additional Rushcliffe developments", adding further to journeys which have increased in length over recent years due to heavy use of primary and secondary roads.

**5.** Traffic Flow - The SYSTRA document – Highway Mitigation Ref number 102545 (EX45) concedes there will be "a small increase in southbound flow on Tollerton Lane in the morning peak only (92 vehicle increase) "para 6.2.2. We contested during the consultation re the East of Gamston / North of Tollerton that even a small increase will add to an already overburdened stretch of road. This is still our view.

In the same document at para 6.3.1 it states that local congestion implications include an " increase in congestion on Tollerton Lane at the Lings Bar Road / Tollerton Lane junction resulting in this arm being pushed beyond its capacity in both the AM and PM peaks. This is due to the additional development traffic passing through this junction and results in a greater use of the new Gamston access junction to the south for northbound traffic".

Over a 12 hour period 6.30 am - 6.30 pm in the 2014 survey conducted by the Tollerton Against Speeding Campaign (TASCforce) at the junction of Cotgrave Lane / Tollerton Lane confirmed a total flow of 4585 vehicles through the area proposed for development (in both directions past the airport) on Tollerton lane.

#### **Summary**

TASCforce rejects the proposed developments around Tollerton Village as part of the Local Plan for all the evidenced reasons above .

Tollerton is a village that has significant and worsening traffic problems. We have experienced some improvement, notably the reduction in HGVs recently due to support gained over a long period of time from NCC Highways Authority.

Once again insufficient safeguards have been incorporated to preserve the integrity of Tollerton as a village, currently only 850 houses. Paragraph 57 of the Inspectors report states, "A mixed use development including around 2,500 dwellings to 2028 and a further 1,500 homes post 2028 is proposed. This is consistent with paragraph 83 of the NPPF and securing Green Belt boundaries which will have long term permanence and be capable of enduring beyond the plan period, and I support it. Those with interests in neighbouring land to the south and north argued that additional land should be considered for development extending the East of Gamston/North of Tollerton site. The case was made for including land at Homestead Farm and in the Holme Pierrepont/Adbolton area. However, I consider it unnecessary at this stage to enlarge the urban extension. Although there is merit in the argument that environmental features rather than land ownership should set the boundaries of the Green Belt, I have concerns about the potential effects of bringing development closer to Tollerton. Similarly, development to the north would limit the gap to Bassingfield, and extend into areas where there is a risk of flooding. With provision for 4,000 new homes altogether up to 2034, I see no need for safeguarding additional land and removing it from the Green Belt in this part of the Borough".

In short our objections are -

- $\tilde{\mathbb{N}}$  The likely impact of industrial and commercial vehicles regularly using narrow lanes some of which have no footpaths
- N Increased traffic negotiating a number of significant bends in the road including a double bend on Tollerton Lane which is a regular site of accidents
- ${\sf N}{\sf The level}$  of traffic congestion within Tollerton and surrounding roads
- ${\sf N}{\sf I}$  The increased level of traffic during peak periods in particular
- New junctions on the A52 and A606 will not reduce the level of traffic flow , indeed it is more likely they will simply create bottle necks elsewhere
- $ilde{\mathbb{N}}$  Likely damage to the environment due to HGVs using narrow lanes
- $ilde{\mathbb{N}}$  Noise levels from heavy traffic particularly at night
- $\tilde{\mathbb{N}}$  The increased risk to children who access the primary school and play group on a busy corner.
- $ilde{\mathbb{N}}$  Failure to provide footpaths, cycle paths and public transport for existing residents.

#### We do not consider the Local Plan to be sound