

P25-0844

31 October 2025

Planning Policy Team  
Rushcliffe Borough Council  
Rushcliffe Arena,  
Rugby Road  
West Bridgford  
Nottingham  
NG2 7YG

**VIA Email**

Dear Planning Policy

Pegasus Group are instructed by Nottinghamshire County Council (NCC) in relation to planning matters at their site which forms part of the Gamston Sustainable Urban Extension.

**Background**

NCC have land holdings located within the wider land area east of Gamston which benefits from an allocation within the adopted Rushcliffe Borough Local Plan. Policy 25 of the Plan allocates the land for around 4,000 homes in total, with 2,500 new homes expected within the current plan period of up to 2028 with the further 1500 delivered in the next local plan period. Policy 25 also makes provision for 20 hectares of employment development, a new neighbourhood centre and other community facilities as appropriate.

The allocation policy is clear the delivery of the site will be determined through a Masterplanning process, with the development appropriately phased to take into account the provision of the necessary infrastructure. The timely delivery of the necessary infrastructure to support the development is key. Of note are paragraphs 3.257 and 3.258 of the Local Plan which set out:

*"Transport modelling work undertaken to look at the likely cumulative effects of proposed development within Rushcliffe and the wider Greater Nottingham area has been used to identify that there will need to be direct improvements to the A52(T) in order to accommodate development. Primary access for the site is, at present, expected to be achieved by two individual accesses directly onto the A52(T) Gamston Lings Bar Road, one of which allows connection to Ambleside within Gamston. .... Exact access arrangements and the timing of delivery will be determined through the masterplanning process and more detailed transport assessment work."*

In relation to phasing, paragraph 3.25.12 states:

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*The parameters of the proposal and phasing requirements will be worked up through the masterplanning exercise, taking into particular account those matters set out at paragraph 3.25.5 above. The delivery of development will be dependent on the progression of A52(T) and associated other highway improvements.*

### **The Emerging Greater Nottinghamshire Strategic Plan**

As the adopted Rushcliffe Local Plan is aged, work has commenced in conjunction with the Greater Nottingham authorities on the new Greater Nottinghamshire Strategic Plan. The Council's latest Local Development Scheme, published in February 2025 suggests that the plan will be adopted towards the end of 2026.

Emerging Policy 31 in the Greater Nottinghamshire Strategic Plan provides further commitment to the development of the site for around 4000 dwellings. The Emerging Policy 31 allocation also maintains the provision of employment development, a neighbourhood centre and appropriate community facilities on the land. Of note, the amount of land set aside for employment is reduced to 15 hectares in the emerging plan.

As with policy 25 of the adopted Local Plan, Emerging Policy 31 remains clear that the design and layout of the site will be determined via a comprehensive masterplan process. The intention remains for the final design, layout and quantum of development to be appropriately phased to ensure the provision of necessary infrastructure, including critical improvements to the highway along the A52 and public transport network.

Upon review of the current and emerging Development Plan, it remains clear that the Council's expectation is that this strategic site shall be developed comprehensively in a holistic rather than piecemeal manner. The development should be appropriately phased to ensure the necessary infrastructure to support the new homes is delivered. Whilst there have been delays in the development being delivered, thereby leading to the majority of the new homes now likely in the next plan period, this fundamental objective of the Council should not be lost or compromised. The quantum of development proposed can only be provided via a comprehensive Masterplanning process underpinned by collaboration across all the relevant parties.

Since the adoption of the Local Plan, two applications for the site have been submitted by the other land owners within the SUE. These are:

#### 20/03244/OUT - Barwood

*Outline Planning Application for the first phases of a Sustainable Urban Extension at Land East of Gamston and North of Tollerton, comprising up to 2,250 dwellings, a primary school, a local centre (Class E a, b, c, d, e, f and g) and hot food takeaway (sui generis), strategic green infrastructure and associated buildings, childrens play areas, strategic infrastructure including drainage and engineering and demolition works. Full details sought for the principal vehicular accesses off A52 and Tollerton Lane with all other matters reserved.*

Application valid 22<sup>nd</sup> December 2020.



Application 24/00347/HYBRID – Vistry

*Hybrid planning application compromising: (1) Full planning application for a first phase of residential development for 400 dwellings with associated access from Tollerton Lane, partial demolition of the runway, drainage, open space and associated infrastructure works; and (2) Outline planning permission (all matters reserved) for a phased residential development at Tollerton Airfield compromising demolition of existing buildings and runway, development of dwellings, a primary school and supporting infrastructure including accesses from Tollerton Lane and A52, open space, sports pitches, green and blue infrastructure and other supporting infrastructure. | Land North Of Tollerton Tollerton Lane Nottinghamshire.*

Application validated 11th March 2024

These application sites, together with the NCC land, complete the land holdings for the SUE.

**Emerging Supplementary Planning Document**

Since the submission of the two above planning applications, both Barwood/Taylor Wimpey and Vistry have been preparing a draft Supplementary Planning Document for the site, with support from Rushcliffe Borough Council. The purpose of the draft SPD is to provide planning guidance and a masterplan for the development of the site.

Following delays in the process, the Council has published the latest draft of the SPD for public consultation, with the deadline for comments being 5pm on Wednesday 5th November

Our client NCC has reviewed the draft SPD. As previously set out in earlier correspondence with the Council, NCC are cognisant of the need to progress the SPD given the delayed delivery of the SUE and the likely pressure from Barwood/Taylor Wimpey and Vistry to progress the relevant planning applications listed above.

However, NCC remain of the view that the SPD can only be progressed correctly and appropriately. Rushcliffe Borough Council can only agree with this view to ensure any adopted SPD is robust from any legal challenge with regards to procedure or content.

NCC and its consultant team have reviewed the draft SPD, with comments provided at Appendix A. Our overarching comment to Rushcliffe Borough Council is that the aspirations set out in the draft SPD do not appear to have been evidenced to demonstrate compliance with the requirements of adopted local plan Policy 25 along with Emerging Policy 31 of the Greater Nottinghamshire Strategic Plan. The draft SPD fails to set out a comprehensive strategy for the delivery of the SUE in terms of infrastructure provision, phasing arrangements or design. The requirements of the draft SPD may also make the quantum of required development set out in the allocation unachievable.

One further note following our review of the draft Supplementary Planning Document, is that it appears too prescriptive and policy based which is not appropriate in a Supplementary Planning



Document which sits outside of the adopted Development Plan. This could result in the document being vulnerable to a legal challenge.

NCC are seeking to work with Rushcliffe Borough Council and other stakeholders in bringing this site forward collaboratively. It is considered that collaboration between all stakeholders is the only way to deliver the SUE in a way which meets the Council's aspirations for the creation of this new community. NCC has unfortunately not been part of any collaboration already taken place between the relevant parties, however would welcome all opportunities to do so in the future.

Yours sincerely,

Louise Winson

Principal Town Planner

Enc.

# Appendix – A – Gamston SPD Review

<b>Project name:</b>	<b>P25-0844 – Land East of Gamston</b>
<b>Author:</b>	<b>Nick Cox/Louise Winson</b> – Pegasus Group
<b>Date:</b>	<b>31 October 2025</b>
<b>Project number:</b>	<b>P25-0844</b>
<b>Reference:</b>	<b>Gamston SUE SPD Draft – Review</b>

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## 1. Wider Collaboration & Delivery Documents/Agreements

- a. Alongside the SPD there needs to be essential site wide documents that should be an obligation on all landowners/developers to ensure cohesive delivery of the SUE and secure land value parity between owners through gross equalisation principles, including:
  - i. Landowner/Developer Collaboration Agreement
  - ii. Gamston SUE Infrastructure Delivery Plan – IDP
  - iii. Gamston SUE Framework Section 106 Agreement
  - iv. Gamston SUE Allocation Wide Deliverability Appraisal & Cost Plan
- b. Above suite of documents provide the legal delivery framework to achieve of the Delivery objectives set out in the SPD – the SPD provides the broad picture, the delivery framework documents set out how it will be achieved on an equitable basis.
- c. No detail on 'equalisation' which needs to be covered by the Collaboration Agreement but if referenced it needs to be on gross equalisation principles linked to gross acres owned.
- d. The "Whole Site Infrastructure Table" (Figure 46) is not appropriate as it biased towards expected early works referring to both the upgraded A52/Tollerton Land access junction and upgrades to the A52/Ambleside Junction to facilitate access into the SUE, but doesn't include an item for the delivery of the A52 south junction delivered across NCC land. This junction is key to ensure two points of access and completing the loop road arrangement and therefore should certainly feature as a key delivery item with appropriate phasing commitments.

## 2. Achievability of the SPD, 'Land Use Plan' and 'Framework Masterplan'

- a. Limited consideration for site wide constraints, particularly NCC land

- b. A landscape buffer is proposed within the employment land which realistically reduce the amount employment land available. This could undermine the deliverability of policy 25.
- c. No consideration for the location of allotments and community hall
- d. Unrealistic to assume retention of all hedgerows, given gradients in the surrounding location.
- e. Lack of provision of earthworks strategy for the site which results in uncertainty that the land use strategy is deliverable.
- f. No effective strategy set out for attenuation and drainage provision across the site which could result overall impact the achievable quantum of development
- g. Unrealistic for a default position to be permeable surfaces – too much detail on rainwater harvesting techniques. Requirement for permeable surfaces is a policy, not design guidance and is not based on evidence.
- h. No detailed viability work to prove NCC land can deliver the SPD objectives
- i. Has sufficient land been provided for the school sites, have these been reviewed by the Local Education Authority? Is the proposed location of the school sites the most appropriate?
- j. How does the provisions comply with existing guidance i.e. Notts highway design guide, updated and latest SUD's Guidance etc.
- k. Concept images need to be reflective of the local market and ideally Nottinghamshire examples
- l. Employment land deliverable area excluding landscape buffer and layout of an irregular shaped site, this will impact the quantum of employment provision delivered.
- m. No clear overlay of the 'Land Use Plan' and 'Framework Masterplan' with the landownership plan
- n. The theoretical capacity of NCC's land needs to be tested against a multi-disciplinary due diligence exercise before the overall SUE strategy can be agreed upon:
- o. No consideration of engineering (or other) constraints on NCC's land has been carried out so development capacity could change significantly, for all land uses included.

### 3. Fundamental conflicts between SPD and two pending planning applications

- a. Unit numbers do not align with the allocation. The current live applications amount to 3,650 units. The NCC land is earmarked for a further 545 units which equates to 4,195 units in total. The ES work for both current application assume only 4,000 units, therefore there is uncertainty as to whether the mitigation proposal being designed are sufficient for the SPD.

- b. Highway modelling – two different models and capacity extends beyond 4,000 unit allocation
- c. Junction design with A52 and future junction and road designs
- d. Inadequate consideration for off-site junction mitigation
- e. Adequate provision for safe active travel between the SUE and Gamston, across the A52

#### 4. Alignment of Planning Strategies

- a. Piecemeal approach leads to inconsistencies and conflicts that may affect deliverability
- b. Lack of synergy between the two pending planning applications
- c. Lack of consideration for the NCC land within the Gamston SUE
- d. No common approach on highways modelling

#### 5. SPD Development & Engagement Process

- a. Insufficient time to consider draft SPD
- b. No meaningful engagement with NCC and its advisors
- c. Principally put together by two developers raising a potential conflict of interest
- d. Lacks detail to demonstrate deliverability can be achieved within the parameters set
- e. Landownership plan needs to refer to owners and developers – Barwood & TW are not landowners
- f. The SUE Infrastructure Delivery Plan must be considered along side the masterplan/phasing plan and cannot be divorced from it which is the current approach
- g. The draft SPD is prescriptive and sets out policy requirements rather than setting out guidance for the delivery of the allocation. This is not the purpose of a supplementary planning document meaning the draft SPD would be vulnerable to legal challenge.

#### 6. Highway Capacity Comments

- a) The ability to complete the primary street highway loop via connections with the A52 is a fundamental aspect of the RBC Policy 25 & MoU:
  - The location/format/size/engineering feasibility of the A52 southern junction has not been considered in detail;
  - The provision of multiple active travel crossings of the A52 is a fundamental part of the RBC Policy 25 & MoU – no presentation of a grade separated solution has been presented in the SPD or by TWBL/Vistry;

- Both the southern A52 junction and PRoW connection between the SUE and Gamston are located in NCC's land. Their delivery is vital to the completion of the primary loop and active travel connection with the greater Nottingham area (without which NH/NCC Highways/ATE will not remove their respective holding objections).

b) All traffic modelling carried out to date considers only 4,000 dwellings as per the SUE allocation:

- Highways infrastructure and off-site mitigation has therefore been designed accordingly (and does not consider any development overage).

c) It is not clear what trip generation, or traffic modelling assumptions have been made in relation to the employment land uses (i.e. splits between E(g)(I, ii, or iii), B2, B8):

- The assumptions need to be clarified to inform infrastructure design requirements and suitable mitigation measures;
- Future planning permissions would likely condition specific splits, which may ultimately not be commercially viable and/or deliverable based on the findings of detailed engineering appraisals.