



**Ref:**

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This form has two parts –  
Part A – Personal Details  
Part B – Your Comment(s)

## Part A: Personal Details

E-Mail Address:

**If you are an agent acting on behalf of a consultee, please enter your details here:**

Name:

Organisation:

Address:

Postcode:

E-Mail Address:

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## Part B: Comment(s) on draft East of Gamston/North of Tollerton Development Framework Supplementary Planning Document

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Please provide your comment or comments on the draft East of Gamston/North of Tollerton Development Framework Supplementary Planning Document (SPD), together with any suggested amendments below. For each comment made, please indicate to which part of the draft SPD the comment relates (e.g. chapter and/or page number).

### Greater Nottingham Strategic Plan

Relates to paras 1.20 and 3.1

We recommend that the SPD is not adopted (and planning applications are not determined) until the Greater Nottingham Strategic Plan (GNSP) is adopted.

Reason: This allocation is put forward in this key strategic spatial plan for Greater Nottingham, and it is important that allocations are considered across the plan area. Para 2.1 states that the allocation is proposed to be retained in the emerging GNSP. However, this is yet to be submitted for examination and there would be major inconsistencies in spatial planning if the allocation were to be removed from the GNSP.

### Biodiversity Net Gain

Relates to paras 4.55

We support para 4.55 in relation to a minimum of 10% gain. We would however expect that this be amended to include the county wide 20% (or higher) aspiration for BNG as set out in 'A Biodiversity Net Gain Framework for Nottinghamshire and Nottingham' (subject to taking account of evidence and viability considerations). The framework has been produced in partnership by the BNG Working Group for Nottinghamshire and Nottingham, comprising all LPAs in Notts. It has been agreed that all LPAs will implement the framework within their strategic planning work.

Additionally, we support para 4.55 in relation to public access "*The calculations of these provisions will consider whether the areas are open to the public or not as this may impact on the suitability and use of the areas for BNG if humans and domestic animals can access any proposed BNG areas*". Public access to natural green space is certainly a consideration for this site. For instance, curlew was recorded in one of ecological assessments supporting the detailed applications. These birds are very susceptible to human disturbance and are present due to the undisturbed nature of the airfield, and large-scale grassland habitats present.

As well as satisfying the BNG Hierarchy (via mandatory BNG), the mitigation hierarchy as required via paragraph 186(a) of the National Planning Policy Framework (relating to species/ habitats) needs to be followed. This SPD should make this clear. Refer to Gov Biodiversity Net Gain Guidance Paragraph: 008 Reference ID: 74-008-20240214

BNG principles (also put forward in the county framework) gives priority to delivery on-site (priority to **enhancement** of existing **on-site** habitats and then **creation** of new **on-site** habitats). This should be made clear in the SPD. The SPD does not seem to include evidence that the proposed 'Natural Green Space' identified in the masterplan is sufficient to fully enable on-site delivery. We expect that BNG calculations were presented for part of the site in the 2024 application but we assume no assessment will have been carried in the 2020 application, which pre-dates mandatory BNG). We haven't assessed the 2024 BNG calculations but we would recommend that an assessment for the entire site is completed prior to completing the masterplan in relation to mapping / quantifying the extent of natural green space required.

### Phasing/ planning applications

Relates to 1.2, 1.7.1.10 etc

Whilst we acknowledge that planning applications that are not in accordance with the SPD are 'unlikely to be approved', we would expect to see an overall Environmental Impact Assessment (to cover all environmental impacts, including ecology).

There is no reference to the requirement for an EIA in the SPD, or whether scoping/ screening has been carried out. This site exceeds Schedule 2, 10 (b) (ii) the development includes more than 150 dwellings; or (iii) the overall area of the development exceeds 5 hectares.

We assume this hasn't triggered the requirement for EIA but we would certainly expect an Environment Statement to assess the overall impacts across the entire site. To date, 2 applications have been submitted with 2 different red line boundaries and two separate ecological impact assessments -the site needs an overall assessment. As already highlighted in relation to natural green space requirements (under BNG), this baseline is also required to inform the masterplan.

Finally, as two detailed applications have already been submitted (but not yet determined) we wish to highlight the need for up-to-date information to make a planning decision. CIEEM has produced 'Advice note on the Lifespan of Ecological Reports and Surveys'. The lifespan of ecology reports needs to be considered, and overall delivery / phasing of natural green space needs to be agreed in advance. We recommend habitat is created at the earliest opportunity so that habitat can mature and space is available for wildlife to take cover during any construction phase. We would recommend reference to the need for early phasing of delivery and requirement for up to date surveys in the ecology/ Green Blue Infrastructure sections of the SPD.

### **Natural England Green Infrastructure Framework**

Relates to Green and Blue Infrastructure (page 52)

The SPD should adhere to the above, which has several threads (Green Infrastructure Framework Standards comprise Green Infrastructure Strategy Standard, Accessible Greenspace Standard, Urban Nature Recovery Standard, Urban Greening Factor Standard and the Urban Tree Canopy Standard).

There is no confirmation in the SPD that these standards have been utilised in the masterplan.

(Please continue on a separate sheet of paper as necessary)

### **Data Protection**

The comments you submit will be used to inform the preparation of the East of Gamston/North of Tollerton Development Framework Supplementary Planning Document (SPD) and will be held for the lifetime of the East of Gamston/North of Tollerton Development Framework SPD. Please note that your comments and your name will not be treated as confidential and will be made available for public inspection, including online. However, contact details (including address and email) will not be made public and will not be passed to external parties.

**Please tick to confirm you agree to your comments being made public.....** ✓

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**Please tick to confirm you have read and understood the privacy notice .....** ✓