

Planning Policy

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Date: 5th November 2025

Our Ref: 25-014-ltr-003

**Re: Representation to consultation on the draft East of Gamston/North of Tollerton
Development Framework SPD**

To whom it may concern

We write on behalf of our client, Tollerton Parish Council (hereinafter referred to as the Parish Council), in respect of the ongoing consultation on the draft East of Gamston/North of Tollerton Development Framework SPD (hereinafter referred to as the SPD).

Given the longstanding allocation of the area covered by the SPD for housing, since the adoption in 2014 of the Local Plan Part 1: Core Strategy, the Parish Council accepts that the SPD is required to govern any development of the site. Therefore in broad terms the Parish Council is supportive of the SPD being prepared, and indeed has repeatedly requested involvement in the discussions taking place as the document has emerged. It has therefore been extremely disappointing not to be involved in the process to produce this document and concerning that the process has been clearly led by those promoting the site for development.

In general terms, the production of a Masterplan for the allocated site is welcomed as a way to create a landmark and flagship development for the Borough and County. The Parish Council considers it to be a hugely important document in ensuring the design, layout and functionality of the site is of a high standard and that there is a clear strategy and cohesion between how parcels under different land ownership are delivered and their relationship with existing communities.

However, having reviewed the document and discussed this with members of the Parish Council and local residents, there are multiple fundamental concerns that the Parish Council considers Rushcliffe Borough Council (RBC) should take into careful consideration prior to the document being finalised. **It is the position of the Parish Council that the SPD as it stands is not fit for purpose and needs considerable rewriting before it could be issued for further consultation prior to adoption. Furthermore, it is paramount that the Infrastructure Delivery Plan is produced and consulted upon alongside this SPD.**



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The Parish Council is available to meet with RBC to work through these comments in further detail and prepare appropriate revision and would welcome this opportunity.

Having recently commented on the draft Developer Contributions SPD, many of the points raised within that document still stand as the clarity that was promised for this allocated site as part of the site-specific masterplan and infrastructure delivery plan have not been delivered. These comments are included again so that you are able to cross reference these matters.

General comments

Having reviewed the two elements of the SPD; the Development Framework and the Design Code, we have the following general observations to make, largely relating to the accuracy and legibility of the documents.

1. No acknowledgement of the Tollerton Neighbourhood Plan nor its policies,
2. A lack of reference to the content of the adopted Rushcliffe Design Code and the emerging Greater Nottinghamshire Spatial Plan and its vision for how development is to come forward in the region
3. Lacking a clear vision, the SPD is vague and inconsistent and includes contradictory statements throughout both documents (many on important technical matters)
4. Lack of aspiration and innovation throughout the SPD (for example, very poor uninspiring photos chosen to illustrate the document)
5. Too flexible and open to interpretation
6. Poor formatting and very small text
7. Low resolution images and illegible maps and keys
8. Poor quality of mapping in general for example in some instances an absence of keys (especially in the 'accessible' online version)
9. Very reliant on Nottinghamshire County Council's land and its input, which to date seems to be very limited

Cumulatively these factors result in documents that are not easy to engage with nor understand. The Parish Council have raised significant concerns with RBC about the consultation process including and these remain unresolved. It considers that the very basic Gunning Principles have not been met.

Even as professional planners used to working with these documents, we have found elements of the SPD difficult to interpret. This gives us real cause for concern about the useability of the document for professionals taking this work forward and the accessibility of the document for the communities affected by its content.

Furthermore, the absence of any reference to the adopted Tollerton Neighbourhood Plan is inaccurate as it forms part of the Development Plan for the land allocated. The allocated site is not excluded from the Designated Neighbourhood Plan Area and whilst RBC and the Neighbourhood Plan Examiner, on the request of the developers promoting the site, requested that policies specific solely to the allocation were removed, this does not alter the status of the Neighbourhood Plan and the requirement for all development coming forward within the Parish to demonstrate compliance with its policies. Appendix A provides an assessment of the documents against the made Tollerton Neighbourhood Plan and identifies key areas of conflict.

Aside from matters of accuracy, the community of Tollerton has worked hard to prepare the Neighbourhood Plan over an extended period and to positively engage with the planning system for the benefit of residents (over six periods of consultation). This is something that should be encouraged and recognised by RBC and not dismissed. The policies of the Neighbourhood Plan seek positive outcomes from development and do not seek to restrict it.

The following sections of this letter provide comments on behalf of the Parish Council relating to each section of the SPD - the Masterplan and the Design Code - in turn.

Document 1: East of Gamston / North of Tollerton Development Framework SPD October 2025

There are a number of material problems and issues with the SPD as currently presented which relate to the following issues in turn;

1. Tollerton Neighbourhood Plan
2. Rushcliffe Design Code
3. Access and Movement
4. Existing Residents
5. Infrastructure
6. Flooding
7. Contamination
8. Green Buffer
9. Active Travel

1 - Lack of recognition or consideration of the Tollerton Neighbourhood Plan

As stated above, a key concern of the Parish Council is the lack of reference to the made Tollerton Neighbourhood Plan. The Neighbourhood Plan includes several policies that are directly relevant to the delivery of the site allocation and sets out key priorities of the community, based on engagement with residents and key stakeholders.

The policy section of the SPD is inaccurate as it does not refer to the Neighbourhood Plan as part of the adopted Development Plan. Relevant policies should be referenced in the SPD and utilised to shape the development proposals and masterplan. The absence of these policies from the policy review and the document as a whole not only invalidates the policy context setting of the SPD, but is a missed opportunity to encourage a higher standard of development and to align that with input from the community resulting in conflict with the operational development plan, failing the most basic of requirements.

Table 1 in Appendix A of this letter provides a more detailed overview of the relevant policies of the Neighbourhood Plan and conflict between them and the Masterplan SPD. Where these conflicts arise the SPD should be amended to ensure that it is in accordance with the TNP as part of the adopted Development Plan.

There are several elements of the Neighbourhood Plan that reflect key concerns and aspirations of the community for the Parish. Inclusion of these considerations within the Masterplan SPD is not only required to bring the SPD into accordance with the adopted policy framework but would greatly improve the standard of design and the integration of the new settlement into the Parish. The following is a summary of matters that feature in the Neighbourhood Plan and we consider are not fully addressed within the Masterplan SPD:

- i. Focus on mitigation and adaptation to climate change and a commitment to inbuilt design measures such as passive solar gain, use and sourcing of materials, reduction of carbon emissions and energy and water usage.
- ii. The Green Buffer as a strategic piece of green infrastructure - there is no reference to the 'Green Buffer' that is detailed within the Neighbourhood Plan, but instead a 'Green Edge' that runs around the perimeter of the site and is minimal in size to the south of the allocation. References to how this area will be utilised are inconsistent across the document and at times conflict with one another; woodland edge, proposed leisure trail, attenuation ponds. No mention of biodiversity enhancement or the importance of retaining visual and physical separation from Tollerton Village. Overall, it is considered that this is a significant 'watering down' of this landscape feature that is set out within the policies and spatial strategy within the Neighbourhood Plan, as well as inconsistency with the adopted local plan, and comments of the planning inspector.
- iii. The green infrastructure strategy for the site is inconsistent throughout the document and lacks coherence. Key landscape features identified as important within the Neighbourhood Plan are not recorded within the context section of the document including numerous trees and hedgerows. No views are specifically acknowledged despite the topography of the site creating multiple views. Figure 20 – Site

Opportunities Plan on page 41 shows a very basic Green Infrastructure strategy with very limited explanation of each opportunity. The Allocation Masterplan Framework, Figure 44, simply identifies areas of green space and makes no mention of blue infrastructure, or wildlife corridors or the 'east west greenway' set out in the Design Objectives (page 44). Whilst there are more 'aspirational' elements within the design coding, this is simply guidance and does not make any concrete commitments or requirements to the quality or diversity of these spaces.

- iv. There is no discussion about how the local and wider landscape character will be incorporated into the masterplan through use of materials, layout, height or densities. A nominal approach is taken that sees reduced densities to the edges of the site. However, the vast bulk of the site is described as being the 'Gamston Fields Area' in Figure 43 – Character Areas Plan. No description of the key characteristics of this character area is provided within the document.
- v. The extent of the provision of services and facilities on the site is unclear. The Site Opportunities Plan, Figure 20, page 41, makes no reference to the provision of new or enhanced facilities on the site and instead focuses on access to facilities at Gamston District Centre. The provision of facilities on site and their integration into a network of walking and cycling routes is crucial to reduce the reliance on the car of future residents. The rationale for having two separate Neighbourhood Centres within the allocation is not justified nor explained.
- vi. Linked to the above point is a lack of strategy for how the allocation will link with Tollerton Village and the services, facilities and activities that take place there. The Neighbourhood Plan includes the 'Tollerton Movement Strategy', which highlights the importance of connections across the Parish and between the allocation and Tollerton Village along Tollerton Lane and the Polser Brook (as noted previously the treatment of Tollerton Lane itself is a matter that is far from clearly defined and resolved). It is a repeated failure of the Masterplan that it fails to look outside the boundary of the allocation and therefore fails to effectively integrate with the context that it forms a part of. The fear is that it will become an insular, isolated, car dependant unsustainable development as a result.
- vii. The Neighbourhood Plan contains a series of important design principles for all new development to adhere to within the Parish. The following bullets summarise where there is conflict between the design principles of the Neighbourhood Plan (Policy 13) and Figure 44 – Allocation Masterplan Framework, which is ultimately the drawing with which future applications will need to comply:
 - There is a lack of consideration of gateways into the site.
 - The reference to 'Proposed Junctions' is very vague - as all intersections are junctions, but only certain ones are identified. It is unclear what makes these ones different and how the development parameters in these locations will be different.

- The hierarchy of streets is very limited in its scope with only a very broad road layout provided and appears very vehicular focused. Further guidance on how lower hierarchies will be considered and integrated is required.
- There is limited mention of Sustainable Urban Drainage Systems (SUDs) other than reference to attenuation ponds located in a ring throughout the 'Green Edge' leisure route around the site.

2 – Lack of acknowledgement of the Rushcliffe Design Code

The Rushcliffe Design Code was formally adopted by the Borough Council on the 1st September 2025. Prior to adoption the document was published in draft in January 2025 with consultation ending in March 2025. It is therefore unclear why there is no acknowledgment of the Design Code nor an attempt to comply with it within the Masterplan SPD. The borough wide design guide does not specifically exempt this site. We appreciate that a separate Design Code for this site has been provided, however the SPD is both inaccurate in its reference to the adopted Borough-wide code and misses the opportunity to reinforce its local importance (paragraphs 1.35-1.36 page 12 of the SPD).

Later within the Design Code section (appendix) of the SPD, there is a rather weak and incomplete discussion of how the strategic design coding in the document and the borough wide design guide will work in concert to deliver high quality design solutions. If this is indeed the intention this approach needs to be much more robustly set out within the SPD if it is to function as intended. As drafted, there is a clear risk that both documents will fail to dovetail effectively and there would be a failure to deliver high quality design.

3 – Lack of consistency and clarity on proposed access works and movement strategy

The Masterplan SPD lacks consistency and detail when it comes to a crucial element of how the allocation will be delivered; access from the A52. Some drawings show two access points straight off the A52 into the site boundary to the east. Figures 20 and 21 detail three access points off the A52, one via Tollerton Lane to the north of the site. Multiple options for access and routes are discussed throughout the document including a somewhat vague reference to the stopping up of Tollerton Lane, a roundabout to the north of the site on Tollerton Lane and bus gates. There is also a misleading implication at paragraph 3.32 that the exit from the A52 to Bassingfield would be an access route into the site. This exit from the A52 is currently clearly signed "Bassingfield Only". Bassingfield Lane is not an existing access route to the site and suggesting that it could be in the future is inappropriate. There is an absence of adequate traffic mitigations for Tollerton village, including Cotgrave Lane, Tollerton Lane and Tollerton School. The significant generation of traffic is not acknowledged within the SPD and points on access and movement are focused within the site ignoring the wider impacts that will result. A highways strategy for the whole area including the site is needed to manage what will be a significant change for the existing residents of the Parish. It is important that this strategy is

prepared and properly consulted upon. This represents another missed opportunity for this SPD document.

Given the impact of the allocation on the local highways network and the amount of time this Masterplan has been in the making (and that the allocation has existed in the Local Plan for over a decade), we are surprised that no agreements or decisions have been made regarding the specificities of the access and movement strategy, especially in relation to the A52. The allocation is made up of multiple ownerships and each will be / are subject to separate outline applications based on this Masterplan. To have no overall agreed strategy for highways at this point is very concerning as it is a central part of the purpose of this Masterplanning document and the Parish Council are unable to support the adoption of this SPD in its absence.

This matter is particularly important given the comments by the Local Plan inspector who specifically considered it the role of this Masterplan SPD in justifying the acceptability and soundness of the whole allocation. Without a clear and precise approach set out then it is considered that the allocation may be unsound.

4 – Lack of consideration of existing dwellings and residents within allocation

The Masterplan SPD makes very limited reference to the dwellings that already exist within the boundary of the site allocation. This includes Tollerton Park and a series of properties situated along Tollerton Lane. Most of the maps prepared do not acknowledge their presence or show these properties and their curtilages as ‘white land’ surrounded by proposed development. This is an unusual approach for a strategic masterplanning document and in any event, is poor urban design practice clearly ignoring existing ‘on the ground’ conditions. We have serious concerns regarding the interface between the new development parcels and these dwellings, in particular the relationship between the secondary school and Tollerton Park. The document acknowledges the sensitivity of this relationship but offers no strategy or approach to be taken.

It is strongly recommended that more attention is given to these existing properties and uses within the wider allocation that will essentially be surrounded by new development. Detailed design and development requirements should be included to ensure that their amenity is protected, that the scale and nature of the development is respectful, and that the overall design approach for the wider site is not latterly undermined by these matters.

5 – Unclear approach to infrastructure delivery

Section 5. Delivery Strategy forms the final section of the Masterplan SPD. It is unclear if this is the Strategic Infrastructure Plan / Gamston Sustainable Urban Extension Infrastructure Delivery Plan (Gamston SUE IDP) that is referred to as an appendix to the SPD earlier in the document or whether that is a separate document yet to be published (albeit there are multiple references to this being published alongside this SPD). In either case, there are

serious concerns about the content and the approach advocated. The Parish Council considers the content of Section 5 to be vague, non-committal and incomplete.

The delivery of sufficient infrastructure to support the provision of such a large site is a matter of great concern to the Parish Council and local residents. Whilst the detailed list of infrastructure to be delivered on site is welcome, including the site wide transport measures, there is a lack of detail setting out which parcels of the site will deliver which elements. It also appears that highways matters will be agreed between those promoting the site and the Highways Authority at a later date. The triggers set out for the delivery of highways infrastructure (Figure 46 – Whole Site Infrastructure Table) are vague and imprecise – certainly not acceptable to be basing any planning obligations on. Moreover, the list of works does not necessarily marry up with the Allocation Masterplan Framework, Figure 44, which contains very little information regarding access and highways strategy. This is a common concern within the SPD as a whole.

The Parish council would also expect the infrastructure considerations to include the timing and establishment of the Green Buffer. This should be established as part of the first planning applications for the site to ensure that existing biodiversity and wildlife is not bulldozed or that boundaries are accidentally expanded upon. The Parish Council is keen to work in partnership with the master plan and developers to further shape the design of this important green infrastructure.

A final concern for the Parish Council is that elements of infrastructure delivery appear to be left to the developers to coordinate who will be providing what and to and resolve any disagreements. Much of section 5 appears to include mechanisms (not in any legal form) that are designed to focus on conflict resolution between the individual developers. This appears to mean that the LPA is outside of these conversations and would not be party to these agreements. Notwithstanding that this, on the face of it seems to be a recipe for disaster and endless legal wranglings, it means that neither the LPA nor the Country Council would have any control over this. Again, a key purpose of this Masterplan SPD in our view is to provide clarity on these matters to ensure cohesive delivery of an overall strategy. The concern is that not all the necessary infrastructure will end up being delivered and what is provided will be piecemeal in nature.

6 – Impact of the development on existing flooding issues

Residents of Tollerton Lane and Cotgrave Lane have been subject to increasingly serious flooding over the last few years. This is caused by run-off from the fields and highway in the allocation area, seemingly inadequate drainage owned by Severn Trent, poor maintenance of ditches and other informal drainage and poor maintenance of the Polser Brook to enable flood water to escape which adds to the build up around residents' property.

The Parish Council has an archive of photo and video evidence demonstrating this and has raised this impact with developers directly.

The section in the SPD on flooding (page 31) is wholly inadequate and is not informed by the lived experience of local residents nor, it seems, by any input from the Lead Local Flood Authority, Nottinghamshire County Council.

The SPD should represent an opportunity to both mitigate against the existing flooding issues and ensure that the development does not create new flood risk (due to run-off or overloading of existing sewerage or drainage assets) for local residents.

7 – Contamination in the airport area of the site

Local residents and the Parish Council have considerable concerns about the existence of radioactive and other contamination due to the longstanding use of the airport site during conflict and for civilian use. The assurances received so far from Rushcliffe Borough Council have not satisfied these concerns, nor have the Borough Council been able to demonstrate that they hold the necessary expertise to understand or manage this risk (as it requires a very specialised area of contamination expertise). Residents are very concerned about the management of existing contamination and the avoidance of it potentially being spread outside of the site.

The SPD's consideration of these issues (a single paragraph at 3.23) is inadequate. The SPD should set out an investigation, testing and remediation framework for those proposing development to undertake prior to planning permission being given on the site. RBC should seek specialist consultant advice on this matter to ensure the safety of existing and future residents. However the Parish Council strongly recommend that RBC engage the Scottish Environmental Protection Agency, due to their expertise in this very specific form of contamination, and consult with the UK Health Protection Agency before adoption of the SPD to ensure that appropriate safeguards are in place.

8 – Inconsistent approach to the Green Buffer

A key element of the allocation of this site in the Local Plan Part 1 was the inclusion of a 'Green Buffer' between the development and the existing settlement of Tollerton. Indeed this was a requirement at examination and is set out clearly at Figure 4, page 11 of the SPD and in quoting the Local Plan, *'The creation of significant Green Infrastructure areas and buffers, particularly on the southern and northern boundaries to contribute to the creation of permanent defensible Green Belt boundaries between the development and Tollerton'*.

The Development Plan expands upon this further through the Tollerton Neighbourhood Plan within Policy 6 – The Green Buffer. It is therefore inappropriate for this clearly established policy requirement to be watered down and changed. Examples of this are provided below:

- Paragraph 3.13 suggests bunds may be used rather than a Green Buffer – that is not in line with the Local Plan.

- Paragraph 3.58 introduces a concept of ‘Green Edges’, an entirely new and abstract concept, not in line with the Local Plan.
- Figure 43 at page 73 introduces another new concept, ‘Woodland Edges’, not in line with the Local Plan.
- Figure 4 at page 100 further confuses things with a different mapping of ‘Woodland View’ (not ‘Edge’), not in line with the Local Plan.
- Figure 7 at page 106 now suggests that the ‘Natural / Semi-Natural Green Space’ will also be permeated by ‘Proposed Surface Water Attenuation’.

To ensure the Green Buffer fulfils its intended purpose it should have landscape structure to it and a clearly defined land use. The Parish Council remains willing to support the development of the SPD to include an appropriate design that has regard to future management arrangements.

The Parish Council expects the SPD to provide a minimum depth and landscape profile for the Green Buffer for planning applications and developers to accord with. It is also crucially important that the Green Buffer should be of consistent or greatest depth at the closest point to the existing settlement.

The Local Plan Policy 25 sets out a clear expectation of a Green Buffer inside and outside of the boundary of the site. Land outside of the allocated site to the south is within the control of those promoting the site’s development and therefore should be utilised to create the Green Buffer as set out within Policy 25. The SPD needs to align to the commitments made within Policy 25 and be far clearer on what must be delivered.

9 – Insufficient commitment to active travel

The SPD falls short of an acceptable position for active travel. Paragraph 2.3 sets the tone, reaching only for ‘not vehicular led’ – there needs to be a positive and ambitious stride towards an active travel first development rather than the current proposals which concerningly will result in a car-dependant settlement. The following points identify specific parts of the document that highlight this concern:

- Page 19 misses a huge opportunity to describe the benefits of an active travel settlement in terms of individual and population health and climate resilience.
- Paragraph 3.33 does not match the map provided – the footpaths are incorrectly described and do not reflect the lived experience of residents who use these important facilities every day. The SPD is silent on how existing footpaths will be protected and enhanced and how new statutory footpaths be established and promoted.
- Paragraph 3.36 suggests that a proportion of Tollerton Lane is of a high quality for footway users and that for the rest of it this needs to simply be ‘extended’. The reality is that for of the majority of the length of Tollerton Lane within the allocation there is

no footway at all – the SPD needs to be much stronger on what improvements will be delivered along the whole length of Tollerton Lane – for example, a footway, a segregated cycle path and proper bus stop infrastructure - and how this will be sympathetic to the character of the Lane, particularly those parts that remain in Green Belt.

- Paragraph 3.62 is non-committal and unambitious for the site, it needs to be considerably expanded and made much more definitive.
- Paragraph 3.63 is similarly vague and non-committal. There is an opportunity to improve the permeability of the junctions to the southwest of the site, i.e. Wheatcrofts and also others adjacent to the site.
- Paragraph 4.5 should include an objective to promote active travel within, to, from and around the site.

Both the TNP and the Tollerton Parish Plan set out local desire for a cycle connection along the Polser Brook. The SPD misses the chance to include 200m of connection to make this happen.

In a similar manner to the unacceptable position with Highways regarding the access plan, the SPD should have an agreed Public Transport Strategy (paragraph 4.66) to underpin it.

Document 2: Appendix - Land East of Gamston and North of Tollerton Site Wide Design Code, August 2025

The following points provide a summary of feedback on behalf of the Parish Council having undertaken a review of the draft site wide Design Code:

1 – Inconsistencies between elements of the site wide Design Code and the Rushcliffe Design Code

As previously noted with regard to the Masterplan SPD, it is disappointing that there has been little reference to the adopted Rushcliffe Design Code throughout the site wide design code albeit as mentioned there is some vague and incomplete assessment of how they might work together on this site. Specific areas of conflict appear in the codes relating to building height and scale and in relation to the design of streets (for example, road width treatments), for which there appears to be some reasonably detailed guidance. Whilst some differences may purposefully be incorporated due to the specific characteristics of the site allocation, there has been no justification or explanation of these differences.

On another matter there is inconsistency between the Borough Wide design code, the masterplan SPD and the design code on the exact requirements for a primary or top hierarchy street. These all have different measurements for road widths, pavement widths and planting, and all of these are slightly different. Even within the design code itself two following pages

include a different requirement for a carriageway width (see section 4.6 versus 6.8). This confusion is unacceptable and has the potential to completely undermine the design code.

2 – Insufficient specific detail on design itself

Much of the design code contains very little detail and presents somewhat generic and vague design instructions. This lack of specific detail or requirements is most notable in the sections that deal with the establishment of the key character areas, and the guidance for the green infrastructure / open space specifications. These sections of the code appear to be far more aspirational, illustrated as they are with a series of best practice images, none of which is actually representative of what might ultimately be delivered. These sections do not include the specific requirements; simply put, they are illustrative in nature.

This is not what is recommended within the National Model Design Code. These approaches should be coupled with coding for urban block form (size, scale, density, garden spaces) and the role and function of the green spaces that are to be provided. Whilst the introduction to the design code does suggest that these would be included within the code, for some reason they are completely omitted. This is yet another example of where it is evident that material has been removed from what was a more comprehensive approach.

This limited approach to character and green space appears incongruous with other sections of the coding. For example, bin storage and provision is very specific and detailed even down to specifying clearance areas around wheeled bins. This disparity between the overall level of detail provided runs the risk of the hard infrastructure being prioritised in the design process over the creation of places. This runs counter to the policy requirements set out in the Tollerton Neighbourhood Plan and the aspirations for good design as outlined in paragraph 135 of the NPPF.

The inconsistency also runs the risk of limiting the extent of influence over the design as a whole, as individual developers may well ignore certain aspects as unfeasible and conflicting. This raises the question of whether the document as a whole actually functions as a Design Code and whether it complies with the requirements of the National Model Design Code. In its current form it is considered that the design code would very quickly be dismissed as a poor quality policy document that has little or no weight in decision making.

3 – The code does not deliver all that it promotes

As already alluded to, an identified issue within the Masterplan SPD is that the Design Code sets out principles and contains statements that it then does not go on to deliver through the site design or provide detailed coding on. This is clearly evident when reading the paragraph under the tier 1 site wide instructions heading on page 3 of the Code. The following bullets review what it says should be provided compared with what actually is provided:

- Street typologies – this is a plural when in fact, unlike the masterplan SPD there is only one street typology specified.

- Block principles – which appear to be totally lacking excepting some vague elements of the character section – none of which is mandatory.
- Landscape structure – As above this is totally lacking in specificity.
- Building form – Aside from some discussion over building heights (none of which is secured by a requirement or code) there is little on this matter
- Sustainability - This section appears to be completely absent from the design code, which is in direct conflict with Policy 1 of the Tollerton Neighbourhood Plan.
- Services and security – This is well specified but seems as if it has simply been lifted from other guidance and shoehorned into the code.

As noted, the importance of secondary routes, block and building forms should be prioritised and detailed within the code to ensure coherence and high quality throughout the development between the different parcels of land delivered. Opportunities to reinforce a sense of place and to aid with wayfinding and legibility through these and related elements is missed.

4 – Lack of control over the role and functionality of proposed open space

The Design Code includes a lot of references to key guidance and best practise in this regard. However, the output lacks clarity on how open space will be delivered, what form it will take, what the hierarchy of spaces will be and how they will function. Whilst figure 4 of the design code identifies a network of different types of spaces that are broadly described on page 8, there are no actual coding requirements in terms of size, functionality or requirements for planting or recreation provision. For example, green space 5 (The Green Hub) makes references to play and sports provision, but not about what types of pitches or how many, whether the children play is for all ages, whether there should be a MUGA etc.

The Parish Council remains very concerned about the land at the southern edge of the site (part of the 'Green Edge'). It is very limited in size and yet is identified as being the location for attenuation ponds, a leisure trail and woodland. It appears that there is not a clear strategy for this part of the site or for the open spaces across the site as a whole. The concern is therefore that with a lack of strategy these spaces will lack character, will not serve the function needed and will relate poorly to one another and the rest of the development. It is considered that there would be a very real risk of the design code running counter to Policy 6 of the Neighbourhood Plan.

5 – Poor urban design and a poor masterplan

Finally, there are a series of concerns relating to the fundamental quality of the design work that has been prepared.

- i. The work relating to character is very land use based and fails to incorporate or reflect baseline work presented in the Masterplan SPD on character and vernacular. There are

not enough character areas and no guidance as to how different characters will be reinforced and defined.

- ii. No work has been done to reinforce local vernacular and ensure a coherent design language across the site in terms of architectural style, detailing and materials. This means that the style and quality of the architectural solutions could be 'lowest common denominator' and nothing within the code would be useful in raising that standard.
- iii. The public and green spaces are not integrated well into the wider layout and lack careful consideration, with few if any guarantees that their location and scale could be secured. Furthermore, there are issues with how the spaces will be overlooked and how they would, in design terms, balance the competing requirements for nature, open space, sustainable drainage and recreation. Far more detailed consideration is needed.
- iv. No work has been done to set out block form or grain pattern. The very real danger here is that urban blocks will not be used resulting in poor use of space and poor streets that do not relate well to one another or promote non-vehicular movement. Whilst some 'frontages' have been identified, implementing these would run the risk of causing some awkward block forms associated with the surrounding streets and spaces as well as existing land uses on the site.
- v. No recognition of how new development will relate to existing built features on the site, especially given none of these elements are excluded from the site boundary. This includes existing residential and commercial uses in addition to limited work on how all the pillboxes will be treated. Those to the north appear to be within public space but the document is silent on those to the south.

Conclusions

To reiterate, there are a number of significant concerns that span both the Masterplan SPD and the site wide Design Code. A primary concern is that the lack of acknowledgement of the Tollerton Neighbourhood Plan means that RBC risks adopting an SPD that does not accord with the adopted local development framework. It is a significant inaccuracy and sends a very poor message to the community who have taken considerable time to produce this Development Plan document, which has gone through multiple phases of widespread consultation and a public referendum before it was formally adopted. Appendix A provides an assessment of the documents against the made Tollerton Neighbourhood Plan and identifies areas of conflict which result in the SPD as whole not being fit for purpose.

Other key concerns relate to the consistency of the documents and the plethora of missed opportunities they represent, especially with regard to the Site wide design code where even the aspirations outlined in its own introduction appear to have been omitted. There is a lack of clarity in terms of provision of infrastructure (highways, community and facilities) and a lack of true direction for those delivering this allocation across separate parcels of land. The

document reads as if it has been written by a great many different authors and it seems increasingly likely that elements have been watered down or omitted at short notice before the publication was put out for consultation.

Finally, it is important to place this document in its wider planning context. It is a masterplan and infrastructure delivery plan for the single largest allocation within the Local Plan, a site that features heavily in the emerging Greater Nottingham Plan and is vital in delivering the local authority's housing land supply over the next decade. This could be a model development that would provide a template for other, similar development in the future both locally and more widely. For such an important site (in both planning and political terms), to offer this document as the basis for consultation in its current state is extremely disappointing and fundamentally undermines public trust in the planning system and the proper planning approach.

We reiterate the disappointment of the Parish Council that this period of consultation is the first time that they have been engaged in this process despite its very clear level of pragmatism and its commitment to ensuring this site comes forward well. It is a firm believer in the principle that 'none of us is clever as all of us' and the SPD would be a far better document with genuine input from the Parish Council and community and those who know this locality best.

We trust that the response made above is self-explanatory and helpful in your ongoing deliberations, however, should you have any further questions or queries we would be more than happy to speak to either on the telephone on 01625 265232 or using the email below.

Yours faithfully



Jo Gregory on behalf of Tollerton Parish Council
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Appendix A – Assessment against the made Tollerton Neighbourhood Plan

Policy / section	Relevance	How topic is handled in SPD
Policy 1 – Climate change Aspiration – Climate adaptation statement	Mitigation and adaptation to climate change Aspiration requests that applicants submit a Climate Adaptation Statement meeting a series of objectives focused on: - Reducing the need to travel - Encouraging sustainable modes of travel - Accessibility for all - Efficient use of resources during construction - Use of sustainable, locally sourced materials - Reduction of carbon emissions - Reduced use of energy and water through lifetime of development - Encourage use of electric vehicles - Avoiding unnecessary demolition - Proactive in encouraging biodiversity and wildlife	General reference to the importance of sustainable design in vision section and in Design Objectives.
Policy 6 – The Green Buffer	Accompanied by Diagram 1 –Spatial Strategy which sets out an area of land between the allocation and the village of Tollerton intended to maintain visual and physical separation. This area also provides separation between Greater Nottingham and Tollerton to the west. The community are keen to see this area make a positive contribution to biodiversity and opportunity exists to utilise the space to improve water quality and amenity.	Figure 20 – Site Opportunities Plan shows a wide ‘Green Edge’ which bounds the north, east and south of the allocation. Design Objectives hint at green edge around the site as a whole but do not specifically mention its role to the south of the allocation. Figure 30 – Edge Strategy Plan shows a large area of Woodland Edge Treatment to the south of the site but a very limited amount of this area is within the site itself. Subsequent drawings (e.g. Figure 21 – Land use Plan’ shows a far narrower strip of land, smaller than vegetative strips at the northern and eastern boundaries of the allocation.

Policy 7 - Local Character and the Historic Environment	Accompanied by a list of heritage assets in Appendix A and a summary of local character in Appendix B of the Neighbourhood Plan. This policy seeks to ensure that all new development respects and enhances: - physical attributes and historic assets - local built and cultural character Innovative and contemporary design is supported where its sensitive to local character. Design proposals are to contribute positively to local character through: - plot size, building lines, density - architectural style, use of materials and detailing - boundary treatments and landscape features Proposals must be sensitive to the heritage and cultural value of heritage assets. Grantham Canal – identified as non-designated heritage asset in Appendix C – Heritage Assets List.	Strategy for pillboxes set out within context section of SPD, incorporation into a public route connecting them together to form a heritage trail. Heritage value of Grantham Canal recognised, general point in SPD regarding provision of walking and cycling routes to assets, information boards, themed play spaces and street names. Silent on response to local vernacular
Policy 8 – Landscape character	Identified types of key landscape features to be respected and enhanced: - Areas of woodland - Field boundaries - Mature trees and hedgerows - Landscape views and vistas - Watercourses and waterbodies - Grass verges	Key landscape features not recorded in SPD mapping Figure 17 on page 38. Figure 29 - Green Infrastructure Location is very limited and entirely focused around the perimeter of the site. Many trees and hedgerows are missing from the maps including but limited to: - Trees along the eastern boundary of the site - Trees around the south of Tollerton Park

	- Green spaces / paddocks	- Trees around the entrance to Spire hospital - Trees to the south of 'Swiftair Maintenance' - Hedgerow along the southern border of the Grantham Canal - Hedgerows along field boundaries to north of allocation near the canal
Policy 9 – Local Green Spaces	Local Green Space number 12 Grantham Canal which runs to the north of the allocation	Identified as leisure route and role as heritage asset discussed.
Policy 11 - Sustainable Modes of Transport and Movement Aspiration - Developer Contributions Aspiration – The Tollerton Movement Strategy	Reduction of reliance on the private car and encouragement of sustainable and active travel. Focus on walking and cycling. Enhancement of existing routes and improving the network of routes across the Parish. Policy accompanied by Map 4 – which identifies Tollerton Lane as a Green Lane up to the boundary of the allocated site and improvement to walking and cycling along an existing route which runs north east / south through the allocation. Grantham Canal also identified as a key route for movement. Developer contributions are sought to enhance local bus services and to connect Tollerton village with the allocated site.	Proposed Strategic Active Travel Corridors (Figure 24 – Open Space Strategy) are limited and fail to make use of Tollerton Lane. This plan does not correspond with Figure 32 – Connectivity Plan which shows leisure trails and fails to create a coherent network. Figure 35 – Access and Movement Strategy identifies a network of routes which lacks permeability for pedestrians / cyclists and relies heavily on vehicular routes to connect the network. Lacking a clear hierarchy of streets and spaces. Figure 35 – Access and Movement Strategy is very high level and shows only the 'Primary and Secondary Vehicular Movement' routes.
Policy 12 - Tollerton Housing Strategy	Promotion of a high standard of design in terms of: - Internal and external living space - Indistinguishable affordable homes - A mix of housing types - Reduction of emissions and energy usage - Locally sourced materials (especially timber)	Mention of EV charging points but very limited detail on any of these matters otherwise even within the overarching objectives for the site.

	- Passive solar gain, passive cooling, water reduction measures - Home working options - On site energy generation - EV charging points - Encourage conversions and use of previously development land	
Policy 13 - Design in New Development	Reinforce the existing natural and built character of the Parish. Identify and respond to local character through appropriate scale, mass and plot size. Major development to consider: - Gateways into the site and settlement to reinforce sense of place - Clear hierarchy of streets and spaces (including non-vehicular routes) - Incorporate sustainable drainage systems and green spaces to promote biodiversity and alleviate flooding	Based on Figure 44 – Allocation Masterplan Framework: Lack of consideration of gateways into the site. A reference to ‘Proposed Junctions’ which is very vague as all intersections are junctions. Unclear what makes these ones different. Hierarchy of streets very limited only a very broad road layout provided and appears very vehicular focused. Limited mention of SUDS other than reference to attenuation ponds located in a ring throughout the ‘Green Edge’ leisure route around the site.

**Appendix B – Representation on the draft Developer Contributions SPD on behalf of
Tollerton Parish Council**

Planning Policy

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

By email only to: localdevelopment@rushcliffe.gov.uk

Date: 24 September 2025

Our Ref: 25-014-ltr-001

Re: Representation to the consultation on the draft Developer Contributions SPD

To whom it may concern

I write on behalf of our client, Tollerton Parish Council (hereinafter referred to as the Parish Council), in respect of the ongoing consultation on the draft Developer Contributions Supplementary Planning Document (hereinafter referred to as the draft SPD). The draft SPD is designed to set out more definitively the infrastructure requirements which will be requested and required of new developments and how these are to be delivered / negotiated by the Local Planning Authority (LPA) using conditions, obligations and other legislative mechanisms.

In broad terms the Parish Council are supportive of the SPD being prepared, which offers the opportunity to further increase the transparency and consistency of decisions made on these matters within the development management process. This is especially the case where these relate to planning obligations and section 278 agreements which are typically 'hidden' from public view. There are almost always the most important aspect of the community's interest or representation on any planning application. However, having reviewed the document and discussed this with members of the Parish Council there are several concerns (listed 1 – 3 below) which the Parish Council would appreciate the LPA considering further as the document is finalised. Much of this is focused on providing greater clarity as to the role of the Parish Council in this process.

1. Lack of clarity to the process of agreeing obligations

Whilst the document fulfils an important role in setting out the likely considerations and requirements for infrastructure within new developments, the actual mechanism(s) and process towards agreeing the final package of contributions is not effectively illustrated in the document. As a general point the Parish Council highlight that the document is not particularly user friendly or easy to cross reference and the language used – especially in the latter sections – is not appropriate for use by communities and other 'non-planning' audience. This is particularly important if the document is to help the LPA engage local communities and landowners as supported by the planning practice guidance (ref: 23b-013-20190315).



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Beyond this initial concern the Parish Council consider that the document does not provide sufficient detail as to the decision-making approach that the LPA will take in negotiating any planning obligation or on-site infrastructure requirement. In many cases the document simply refers to 'negotiation' being undertaken, without any idea as to what the goal of the LPA might be. In other cases, it is implied that these discussions would need to include other parties, including infrastructure providers and in some cases the Parish Council. The document is unclear as to the exact process used to effectively engage these parties within negotiations and at what point these discussions would occur. Is this prior to any application being placed before committee? After a resolution is made? Or during the final agreement of the obligation? The draft SPD lacks this clarity.

This lack of clarity is a concern for the Parish Council since it effectively impedes their ability to engage positively with the process. In this respect there are two additional elements that it is considered may be positive additions to this draft SPD and would further address these concerns.

- A. It is strongly recommend that a 'workflow' diagram (or similar) is included within the document showing not only the stages of negotiation and process to agree any contributions, but also where consultation and engagement with key parties (including Parish Council's) would be undertaken. A very simple example of this is contained on page 14 of the Nottinghamshire County Council Development Contribution Strategy (2024), albeit there are almost certainly going to be more matters to consider than in this example. The graphical nature of this workflow would assist all parties in understanding their roles and responsibilities in the process.
- B. It is considered that some 'standard templates' for planning obligations, conditions and section 278 agreements could be included in the appendices to the SPD as recommended by the planning practice guidance (ref: 23b-016-20190901). Whilst the Parish Council acknowledge that there will always be exceptions to the rule, having a clear end goal would go some way to 'demystifying' the process and help third parties and the communities make representations on these matters appropriately.

2. Implications of the lack of CIL on the strategic allocation (Gamston Fields)

The draft SPD makes significant reference to the role of CIL in delivering several of the local infrastructure requirements for new housing growth within the Borough. CIL of course is non-negotiable and simplifies the process. Notwithstanding this the LPAs most significant allocation under Local Plan policy 25 (land east of Gamston and north of Tollerton – aka Gamston Fields) is exempted of all CIL payments. The planning policy rationale for this is clearly articulated as part of the CIL charging schedule given that the policy designation includes the requirement for the provision of significant on-site health, education and other community infrastructure. However, the relationship of this draft SPD to this allocation still is unclear. Both the SPD and the policy still rely heavily on the 'masterplan' that will sit alongside the allocation has purportedly been in development for nearly a decade.

The Parish Council would like to request that some additional consideration and comment be provided in the SPD focusing on how developer contributions would be delivered on allocations (like Gamston Fields) where there is no CIL payment in place or where specific and policy defined infrastructure requirements are to be delivered. The significance of the allocation within the local plan strategy (both in the existing and emerging Greater Nottingham plan) clearly indicates the sites importance. As a result providing further guidance on how this would be delivered is considered to be an omission. Without this, the way in which the infrastructure requirements of the policy (secondary school, two primary schools etc) would be negotiated and implemented is unclear, as well as how the provision of the significant open space and parkland would be provided. Whilst we understand that it is difficult to co-ordinate this approach across several developers all bringing forward elements of this site, it seems prudent that the headlines to the approach / methodology be outlined within the draft SPD. This could also be beneficial for other strategic sites that are brought forward in the merging local Plan or the GNSF.

3. Parish Council's adopting and managing new open spaces

There are several references within the draft SPD which refer to the possibility of Parish Council's adopting and managing sports, leisure and open space provisions delivered within new developments. In the absence of the local authority taking responsibility for these spaces – something that the draft SPD makes very clear is not something that would be sought – the Parish Council consider that they are best placed to take responsibility for these spaces. Therefore, in principle, the Parish Council would be very pleased to explore this with developments within their Parish boundary allowing them to actively participate in providing and retaining high quality open space and leisure facilities for their community in the long term. To that end they consider that the wording and approach outlined in the draft SPD might be strengthened to suggest that Parish Council should be given first refusal.

The policy wording for the strategic allocations at Gamston Fields, includes development plan policy criteria for a significant proportion of open space and recreational land to the eastern and southern edges of the proposed built form, much of which is to assist with assimilating the development into the landscape and providing a buffer with Tollerton village. The parish Council are keen to support the delivery of this 'green buffer' and through both their Neighbourhood Plan spatial strategy and in representations to the local plan have consistently support its inclusion. The Parish Council see this provision as vital for helping to create a sense of community for the new residents and protecting the amenity and aspirations of the existing villagers.

Therefore, the principle of taking on both long term ownership and stewardship of these spaces (including potentially verges, pocket parks and some planting within the core of the development itself) is very much welcomed. For clarity it is a matter that has already been mentioned to developers bringing forward sites during pre-application discussions. However, in supporting this approach in principle the Parish Council would like to set out several matters which should be considered and perhaps included in the SPD to allow for this to be facilitated. These are listed on the following page:

- A. Care needs to be taken when planning and designing these spaces from a multifunctionality perspective. It has become common place for open spaces and parks to be integrated with sustainable drainage measures and biodiversity net gain enhancement. Both latter elements come with a series of legal and legislative requirements which would impede the adoption of any spaces by a Parish Council. In fact, the Parish Council consider that the adoption or transference of responsibility of any SUDs or drainage to a Parish Council would be beyond their statutory powers. Spaces that included these elements such open spaces or parks could not be transferred. Therefore where a developer and Parish Council agree that these could be transferred through planning obligations to the Parish Council they must be designed to allow for separation of these other elements. Setting this out more clearly in the draft SPD would certainly be welcomed.
- B. If the Parish Council are to become the long-term custodians, then it is vital that they are involved in the design and specification for these spaces and parks, not just in negotiations over their management when installed. The Parish Council have clear aspirations for how everything from street furniture to surfaces should be designed to match and meet their current assets but also the role that each new place and space should provide in offering a range of different recreation and leisure provision. Simply being responsible for several small children play facilities all with different infrastructure would be deleterious. In that respect, and in many ways reiterating the call for a clear and transparent process from point 1, it would seem prudent to set out more clearly how Parish Council's should be involved in the design and development process should developers wish to explore passing spaces to them for long term adoption.
- C. Whilst the Parish Council acknowledge that any spaces that are adopted under this process could be funded in the longer term from precepts from new housing, in the short term, there would be a significant and demonstrable financial burden on the Parish Council. As a result, in line with policies in the existing local plan (and the emerging GNSF) any transfer of these spaces much also come with a package of finance measures to fund the ongoing maintenance of these spaces. The requirement for this management would be to meet the short-term needs (10 – 15 years) would need to be negotiated with the Parish Council.

Collectively these three points require a much earlier engagement with the Parish Council than simply when the planning application is submitted as they come to the core of the design and delivery of the spaces for which permission would be granted. The draft SPD would sensibly be added to advocate for early pre-application discussions where developers wish to transfer leisure and recreational spaces to a Parish Council as well as some of the topics and issues that would likely be sensible to discuss.

I trust that the response made above is self-explanatory and helpful in your ongoing deliberations, however, should you have any further questions or queries I would be more than happy to speak to either on the telephone on 01625 265232 or using the email below.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B Phillips', with a horizontal line underneath.

Bob Phillips

MTCP(Hons), MA(Urban Design), FRTPI
Director: Planner and Urban Designer

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