

BRADMORE PARISH COUNCIL

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Greater Nottingham Strategic Plan – Growth Options Consultation¹

Comments from Bradmore Parish Council

1 Question OS1: Urban Intensification Growth Strategy

- *Should we focus growth in and adjacent to the urban area as far as practical to meet development needs?*

1.1 Yes. The emphasis should be on re-using previously developed land, maximising the use of existing infrastructure and urban regeneration. The Green Belt should be protected.

2 Question OS2: More-Dispersed Growth Strategy Option

- *Should we opt for more dispersed growth, expanding existing settlements or developing new settlements within or beyond the Green Belt?*

2.1 No. We do not agree with any of these suggestions. The Green Belt should be protected. The dispersed growth strategy amounts to nothing more than Nottingham urban sprawl and a more viable option is that of development within Nottingham itself.

2.2 The site labelled “Land East of Loughborough Road” (R12.4² (in pale yellow) on the map on page 99 although in the table on page 97 it has been labelled as R12.3) is very close to the village of Bradmore. The focus of our response to the entire consultation is on this particular site because it directly impacts the village of Bradmore and the community we, as a Parish Council, represent.

¹ <https://gnplan.inconsult.uk/consult.ti/gnspgo/consultationHome>

² See map at Appendix One

- 2.3 There is a lack of infrastructure to support more dispersed growth into the open countryside at this location, and it would undoubtedly lead to increased commuting, congestion and pollution. We are also concerned that if this site were to be given the go-ahead there would be a significant risk of “creep” in that it would not take long for development to spill over / disperse into other nearby sites.
- 2.4 We sought the views of Bradmore residents when preparing this response and their feedback was overwhelmingly opposed to the inclusion of site R12.4 in the plan. We have incorporated many of their comments into this response. Bradmore Parish Council is strongly opposed to the inclusion of site R12.4 in the plan. It should be removed from any subsequent consultation.

3 Question OS4: Transport-Led Growth Strategy Option

- *To what extent should the location of development relate to existing and proposed transport infrastructure?*

- 3.1 Any development should be located in areas where there is good existing transport infrastructure, in particular public transport infrastructure, and where there are proposals to improve the level of public transport infrastructure. This would be in line with the theme running throughout the consultation that it should guide development towards carbon neutrality and the commitment from all the partner Councils to be carbon neutral before the end of the plan period in 2038. In our view, this rules out the Land East of Loughborough Road (R12.4 on the map on page 99).
- 3.2 We do not consider that the Land East of Loughborough Road (R12.4) is suitable for development because there is limited public transport infrastructure within reasonable walking distance and no proposals being put forward to improve it. A bus service along the A60 between Nottingham and Loughborough is provided by Kinchbus, a private bus company based in Loughborough. This is half hourly during the day, and less regular in the evenings and at weekends. There is a bus service from Ruddington into Nottingham provided by Nottingham City Transport. Some of this service comes out to Rushcliffe Country Park. It is currently unclear what impact the COVID-19 outbreak will have on the sustainability of public transport provision in this area going forward. Unless there is a very significant increase in investment in public transport in this area, it is highly likely that the residents of any development at location R12.4 will be heavily reliant on their cars for both commuting and private / leisure journeys, as the existing residents of Bradmore are already, with resultant increases in greenhouse gas emissions and congestion along the A60.
- 3.3 With Ruddington being the nearest shopping centre to Bradmore, we believe it is fair to say that it is itself approaching full vehicular capacity for such a small village centre. There are very limited public transport links between Bradmore and the centre of Ruddington. There are no cycle lanes in the area.
- 3.4 We note that the site assessment³ from the main report (for the whole of the R12 proposal not just the section within Bradmore parish) mentions that the area is judged to have “high accessibility”. This appears to place significant reliance on the use of private motor vehicles as there is limited public transport



R12 Report 1.pdf

infrastructure in the area (as already mentioned), particularly in the area near the Land East of Loughborough Road (R12.4). The A60 which runs alongside this site is arguably already at full capacity in the direction of Nottingham at peak times of the working week, with a particular bottleneck caused by the Mere Way (Ruddington Business Park) roundabout and the Kirk Lane traffic lights. Between 08:00 and 09:00, it was relatively common (pre COVID-19) for traffic to back up from the roundabout all the way back into Bradmore village and towards Bunny. This is likely to be exacerbated by the large housing developments which have already been granted planning permission on the land to the east of the Mere Way roundabout in Ruddington and on Bunny Lane, Keyworth (neither of which are mentioned in the Plan document). Limited acknowledgement or provision has been given in the planning consents for these sites of the problems of congestion on the A60.

- 3.5 The site assessment mentions that the disused Great Central Main Line railway offers future possible development / accessibility improvement potential. Given the likely enormous cost of bringing the line back into commercial use, it is unclear whether this is a serious suggestion. If it is, we would have thought it should feature more prominently in the plan, particularly given the large scale housing developments in this area that are potentially being proposed and the current lack of public transport infrastructure in the area.

4 Question OS5: Climate change

- *How can we address climate change and in particular drive the area to becoming 'carbon neutral' within the Plan period?*

- 4.1 For the reasons already mentioned under **Question OS4: Transport-Led Growth Strategy Option**, we cannot see how you can both address climate change and develop a large area of countryside in the Green Belt, like the Land East of Loughborough Road (R12.4 on the map on page 99). We cannot see how taking agricultural land out of production and building houses on it, whose residents will be dependent on their cars, is compatible with driving the area to becoming carbon neutral within the plan period (para 2.2).

5 Question OS7: Growth Options

- *Which of the broad areas of search identified in the Growth Options Study do you prefer, and why?*

Question OS8: Other Growth Strategy Options

- *Do you think there are other growth strategy options, which should be considered? If so, why?*

- 5.1 We do not support the inclusion of the Land East of Loughborough Road (R12.4 on the map on page 99) in the list of site locations. We are firmly of the view, for the many reasons stated in this response, that this site should not be included in the next stage of the consultation process.
- 5.2 We also strongly oppose the joining up of adjacent villages, which is what site R12.4 does by expanding development out from the south-east outskirts of Ruddington all the way to Bradmore. The further urbanisation of Ruddington together with the urbanisation of Bradmore and permanent loss of open countryside between the two villages must be strongly resisted.

6 Question OS9: Site Assessments

- *Do you prefer any of the sites at Appendix 2, and why?*

- 6.1 The focus of Bradmore Parish Council's comments is on the "Ruddington Extension" and in particular the Land East of Loughborough Road. This area is shown as R12.4 on the map on page 99, but in the table on page 97 it has been labelled as R12.3. Assuming the intended name for R12.4 is East of Loughborough Road, Ruddington this is a misnomer as most of it is in the parish of Bradmore and it joins up the Ruddington and Bradmore villages built up areas. We attach an old map of the site⁴, with the ancient field names, which indicates clearly that the vast majority of the site is in Bradmore parish, not Ruddington. It is disingenuous to label this site as an expansion of Ruddington village.
- 6.2 Bradmore Parish Council does not support the inclusion of this area in the strategic plan for the following reasons.
- 6.3 Bradmore⁵ is a very small village comprising only around 135 residential properties and a population of approximately 300 - 350 people. It is a strong and close-knit community and very proud and protective of its heritage and village life. The heart of the village is to the west of the A60 where the Bradmore Conservation Area and the majority of the older traditional houses and cottages are located, many of which are listed buildings. There is a mix of old and new properties within the village, with those properties located along the A60 being newer. There are no shops and very few facilities in the village, and most residents rely heavily on their cars. A development on a site the size of R12.4 would at least quadruple the size of the village! The historic identity of Bradmore would be subsumed into a continuous line of development stretching from Ruddington and beyond. We cannot see how any amount of planting or screening would prevent the village being overwhelmed, visually and practically, by a new development of this size. Bradmore would lose its unique identity and be changed beyond recognition.
- 6.4 R12.4 covers an area of highly productive Grade 2 very good quality farmland. The National Planning Policy Framework⁶, which all local plans have to comply with, states in relation to using agricultural land for development that "*where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality*" (para 171 footnote 53). Para 171 itself states, inter alia, that "*Plans should:allocate land with the least environmental or amenity value, where consistent with other policies in this Framework*". In our view, this should exclude site R12.4 from this plan.
- 6.5 Building on it would destroy the quality of the soil and change it from an area of food production to one of food consumption increasing the need for food imports. For national security we should be reducing our dependence on food imports. Surprisingly, there is no reference in the report to maintaining and enhancing the production of food for the increasing population. The word 'Agriculture' is mentioned only four times in the consultation document (Page 50 para 5.8, P 57 footnote, P 58 p 5.30, P 103 Environmental constraints) and the word 'food' only three times (P 41 p 3.26, P 58 p 5.31, P 67 p 7.4) and none of these give any consideration to food production.

⁴ See Appendix Two.

⁵ Further information about Bradmore and the Parish Council can be found on the village website – see <http://www.bradmorevillage.org.uk/>

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

- 6.6 In our view, R12.4 should be retained for agricultural purposes and food production, which will also prevent the two villages of Ruddington and Bradmore becoming linked up. On the other hand, developing this site means taking it out of agricultural use and in the process destroying the uniqueness of each village. See the definition of Green Belt, Page 103, and some of the discussion in Chapter 4.
- 6.7 Please explain why one field and one field only, that on the top of Spinney Hill (see map attached at Appendix 2, Field 5, Promised Land) in which the A60 is named, is not included in the overall boundary.
- 6.8 Running approximately east to west across the centre of R12.4 (through Field 4 Lisimore to Field 31, Osier Beds) is a very low area prone to flooding. Also, the most southerly field (No. 21, Labour in Vain) and the one to its north (No 11, Spinney Hill) frequently flood with no easy means of drainage. This last winter of 2019/20, these areas were flooded for several months before having to be pumped out. This is likely to be exacerbated by climate change and by any building on the site. Thus, we do not consider this area is suitable for housing as substantiated by paragraphs 2.8 and 2.9 of the consultation document.
- 6.9 The southern boundary is formed by Mill Lane. This is one of few delightful farm access lanes in the vicinity with an ancient bridleway leading to the historic site of Flawforth churchyard. The flora and fauna supported by this lane and the natural sandy surface of the lane itself would be destroyed by building work and be swamped from use by a vastly enlarged population.
- 6.10 There is very limited infrastructure capacity within the services provided to Bradmore, of particular concern would be last winter's issues with the soiled waste pumping facility at Bunny that failed to cope on two occasions with the excess water caused by the winter storms, causing the sewers to back-up into the village along Loughborough Road.
- 6.11 There are the high voltage pylons running over the R12.4 area which are not mentioned in the site assessment. It is unclear therefore what impact these will have on any development of the site.
- 6.12 R12.4 is currently in the Green Belt and should be treated as such within any new proposals. We see no 'exceptional circumstances' as mentioned in para 4.14 of the consultation document being relevant to this area.
- 6.13 The loss of Green Belt is of concern in terms of wildlife habitat loss. Despite the fields being in arable use it is common for residents to see birds of prey hunting over them, large flocks of yellowhammers in the hedgerows and animals as diverse as stoats to pheasants in the fields. It is widely acknowledged that the countryside is good for people's physical and mental health, and this should also be a factor in deciding whether to build on open farmland, rather than prioritising alternatives such as re-using previously developed land.

7 Question OS10: Safeguarded Land

- *Should this Plan designate Safeguarded Land within the Green Belt? If so, where?*

- 7.1 We do not express any view about whether this Plan should in principle designate Safeguarded Land within the Green Belt, or not.
- 7.2 In terms specifically of the Land East of Loughborough Road (R12.4 on the map on page 99), we do not consider that this site is suitable for development for the aforementioned reasons, and would not support it

being designated as Safeguarded Land within the Green Belt.

8 Question GB1: Principle of the Nottingham-Derby Green Belt

- *Should the principle of the Nottingham-Derby Green Belt be maintained?*

8.1 Yes.

9 Question GB2: Approach to the Green Belt

- *Are there any other considerations that should direct development towards Green Belt areas rather than non-Green Belt areas (including 'Safeguarded Land')?*

9.1 The Land East of Loughborough Road (R12.4 on the map on page 99) is currently in the Green Belt and should be treated as such within any new proposals. Paras 4.2 to 4.4 are particularly relevant to this. Keeping this area within the Green Belt will prevent urban sprawl stretching out from Ruddington, prevent the merging of Ruddington and Bradmore, safeguard the countryside, and preserve the setting and special character of Bradmore village. We note that Green Belt boundaries should only be altered in exceptional circumstances. We see no 'exceptional circumstances' as mentioned in para 4.14 being relevant to this area.

10 Question D2: Conserving and Enhancing the Historic Environment

- *How can the Plan provide a positive strategy for the conservation and enjoyment of the historic environment?*

10.1 The Land East of Loughborough Road (R12.4 on the map on page 99) comes within 100m of the Bradmore Conservation Area, an important historic environment with many listed properties and traditional Nottinghamshire brick and tile houses. The site assessment states that there is "little opportunity for development to impact heritage". We strongly disagree with this assertion. A development on a site as large as R12.4 so close to the Bradmore Conservation Area and heart of the village would completely overwhelm the unique village environment and effectively subsume Bradmore into an unbroken stretch of built up area extending out from the edge of Ruddington. A buffer of new planting would do little to alleviate this and would in any case take many years to mature. It would be difficult to make a buffer look natural. In our view the inclusion of site R12.4 in the plan does not provide a positive strategy for the conservation and enjoyment of the historic environment of Bradmore.

11 Question IN1: Infrastructure to Support Growth

- *Are there any barriers to future housing or economic development in terms of necessary infrastructure provision, and if so what are they?*

11.1 As mentioned elsewhere, in our view there are deficiencies in strategic infrastructure, including transport, for any potential development of the Land East of Loughborough Road (R12.4 on the map on page 99) for

either housing or economic purposes.

12 Question IN3: Timely Provision of Infrastructure

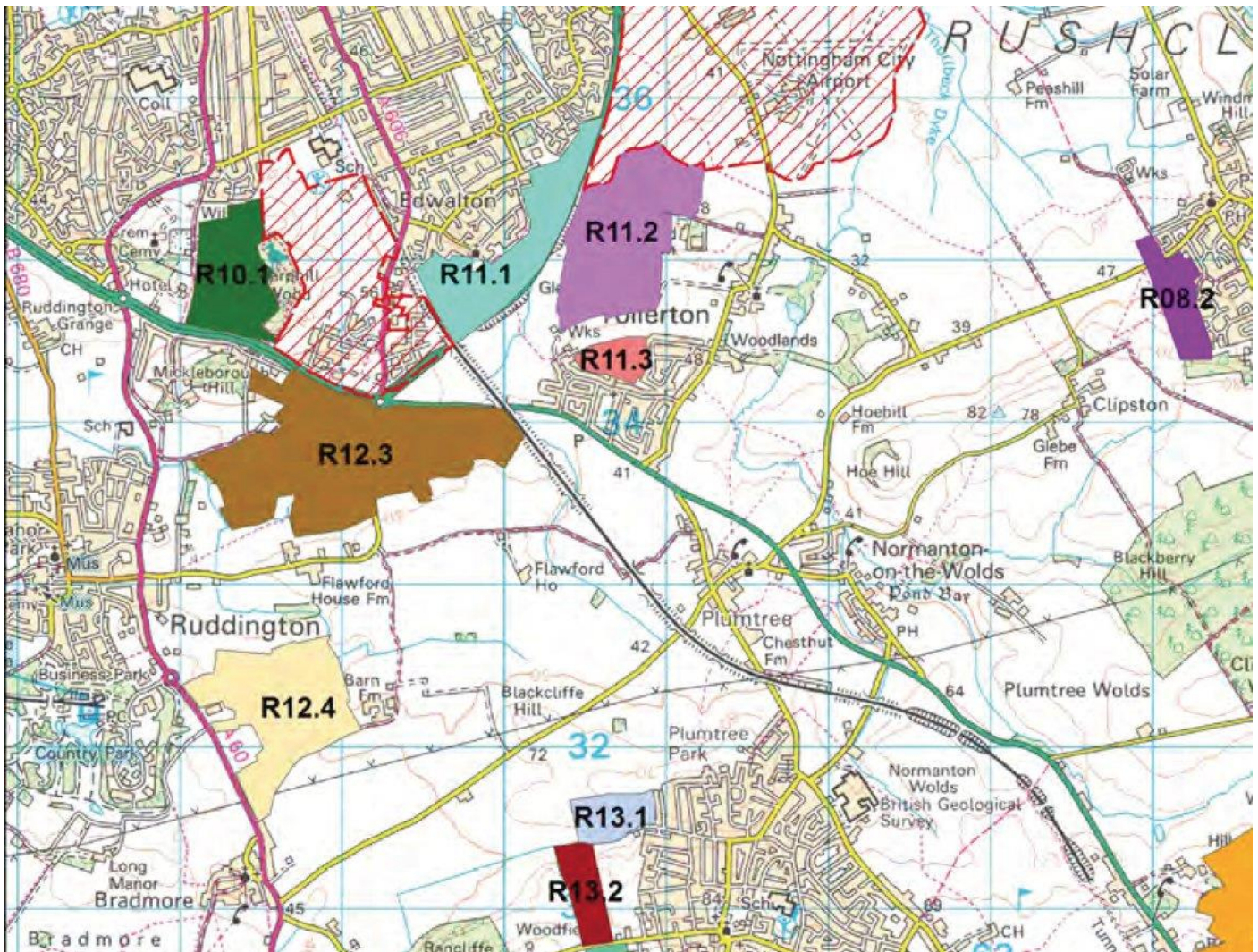
- *How can we ensure the timely provision of necessary infrastructure?*

12.1 With regard to the Land East of Loughborough Road (R12.4 on the map on page 99) there appears to be a remarkable head-in-the-sand attitude to the adequacy of transport and access to services including shopping, health and education, let alone provision of leisure facilities. Perhaps we are expecting too much to have such things addressed so far ahead, but if this site were to be included in the next phase of consultation and ultimately be developed (and we sincerely hope it will not) it will swamp Ruddington and Bradmore's present facilities. There should be no further consultation about development at this location.

Bradmore Parish Council

8 September 2020

Appendix One – Map showing site of R12.4 between Bradmore and Ruddington



Appendix Two – Field Names in site R12.4

