



23 October 2018

Mr Richard Mapletoft
Manager for Planning Policy
Rushcliffe Borough Council
Rushcliffe Arena
West Bridgford

Dear Richard

Draft Rushcliffe Community Infrastructure Levy (CIL) Charging Schedule

Thank you for notifying us and seeking the views of Tollerton Parish Council on the Draft Rushcliffe Community Infrastructure Levy (CIL) Charging Schedule prepared by the borough council.

As you will know the Parish Council has consistently supported the introduction of CIL as a means to fund the infrastructure needed for new development that offers residents the same Great Place, Great Lifestyle and Great Sport as the rest of Rushcliffe. However, we can not support the proposals now being put forward by the Borough Council.

Under these proposals the infrastructure needs identified by Tollerton residents would not be provided for and there would be no local democratic control of funding for a major new settlement in our Parish – the only area to be exempt in the whole of the Borough.

We therefore call for CIL to be applied consistently across the whole of the borough and given both the strategic and community infrastructure needs associated with the North of Tollerton development for the £100 rate to apply to this site.

Please find further comments attached. Please also treat this submission as a request to be notified that:

- the CIL Draft Charging Schedule has been submitted to the examiner in accordance with section 212 of the Planning Act 2008 (as amended);
- the publication of the recommendations of the examiner and the reasons for those recommendations; and
- the approval of the CIL Charging Schedule by the Borough Council.

The Parish Council would also request the right to appear/be represented at the examination and that further details on all of these matters be provided to our Executive Officer at the earliest availability.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'M Garrard', is written over a light blue rectangular background.

Councillor Matthew Garrard
Chairman of the Parish Council

Community Infrastructure Levy

Tollerton parish council is generally supportive of the introduction of a community infrastructure levy and notes the critical need for infrastructure improvements in Tollerton. CIL is a levy that local authorities can choose to charge on new developments in their area. The Parish Council notes that money should be used to support development by funding infrastructure that the council, local community and neighbourhoods want.

Tollerton Parish Council is extremely disappointed that there are to be no CIL payments forthcoming in the Parish as a result of the strategic development on the site North of Tollerton.

The development will have a dramatic impact on the quality of life for residents in the parish and the expected infrastructure contributions towards local road, secondary education and health facilities are inadequate to mitigate the negative implications of this development.

Throughout the green belt review and local plan consultations Tollerton was identified as “an other village” with basic facilities. Within the initial CIL consultation Tollerton was treated the same as a core settlement and yet the parish – and in particular the strategic site within the parish – lack the infrastructure needed to support development. This lack of infrastructure includes both the larger strategic infrastructure such as changes to the A52 but also, importantly the local community infrastructure that would make the new development a great place to live. Tollerton Parish Council is the appropriate body to represent both current and future resident’s needs for such infrastructure but has not been included in the development of the viability assessment or proposals for this site. As a village the infrastructure in Tollerton is basic and already stretched. The Strategic site will require a whole new range of community facilities and infrastructure and so it was considered important for the site to be included in the higher band (£100).

As a designated Neighbourhood Plan Area, Tollerton Parish Council and the Tollerton Neighbourhood Plan Working Group consulted extensively on the need for infrastructure arising from the any future development in Tollerton and specifically from the Strategic Site. These needs are part of what makes Rushcliffe a great place to live and work but they have not been included as part of the requirement to consider what additional infrastructure is needed in the area to support development. Nor has the Borough Council sought to discuss these needs with us.

We know from these comments made during the consultation for our neighbourhood plan that residents are concerned about the poor access onto the A52 and the A606 – major roads that are facing significant increases in traffic flow as a consequence of the development - and that they want to have a say in the options for mitigating the impact of traffic on the small lanes through the village. The neighbourhood plan consultation highlighted the inadequacy of the current cycling routes and we feel that an enormous opportunity has been lost to require the developers to improve the local transport infrastructure to both ease the congestion on these main roads whilst also providing environmentally friendly alternatives to the car and locally designed traffic calming. These needs and green infrastructure should be included in the CIL funded infrastructure to ensure that the community can design and pay for a sustainable development that encourages cycle travel beyond the existing West Bridgford urban area.

Residents have also expressed concerns about the range of facilities in the village of Tollerton, and these will come under increasing pressure given the extent of development now taking place within the Parish. Specifically, the Parish Council’s attention was drawn to the impact or lack of recreational activities available on the Open Space; the insufficient size of the play areas and the poor range of provision; the lack tennis courts; replacement allotments; availability of modern community meeting space/halls and the need for re-development of the bus stop enclosures on Melton Road. Residents also have insight as to the need of future residents in the new development and identified needs to be considered and funded through CIL. These ‘playing pitch and community facility needs’ have not been included in the viability assessment which is viewed as flawed.

The Parish Council also submits that other community facilities should not be excluded from CIL as these needs are best identified and met locally and require the funding through CIL to ensure that they are met. Wider community needs such as those identified in the Rushcliffe Playing Pitch Strategy would also seem to have been excluded.

The Parish Council is particularly concerned that it was not consulted prior to the decision to propose a nil contribution through CIL because of the stated infrastructure requirements of the site itself. We find it hard to accept that the relatively small contributions to come to residents could not be found from a development of this magnitude and likely flow of income generated by the development. It is also hard to accept that a lower amount of say £10 per m² could not have been introduced or a better balance be achieved between strategic and community infrastructure needs to ensure funding through both S106 and CIL.

The National Planning Policy Framework (2018) calls for 'early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees'. (Para 16). We wonder where and when this consultation took place prior to the £0 CIL rate being proposed.

The NPPF also calls for 'sufficient provision' for, amongst other things, infrastructure for transport, community facilities and green infrastructure. It would appear that Tollerton has been excluded from these considerations so that we will suffer the harm generated by the development without any mitigation or enhancement of existing services. Within the Local Plan this area requires significant green infrastructure including an enhanced green buffer and heritage strategy to link and protect the historic pill boxes on the site (including the elevated one regardless of whether it is or isn't now listed). CIL should be applied to promote local community involvement and funding in the development of these requirements. We also do not consider the proposal consistent with the increasing national importance placed on green infrastructure and the proposal to exclude this from the CIL requirement.

We feel, as elected representatives of the local community of Tollerton, that key decisions have been taken that have a dramatic impact on the Parish without any attempt to contact us and to involve us in the process, particularly given that this is a designated neighbourhood plan area. It is also possible that the exemption from CIL for the major development in our Parish could be viewed by the community as deliberately excluding local people from decisions that affect their community for the future – and that this in itself does not support community led planning or sustainable development.

There are many relevant infrastructure requirements that that we would seek to progress and which inclusion in the type of infrastructure and a relatively low level of funding from the developers could support and help to tackle the negative impact of this largescale development within our parish. The Parish Council does not believe that our residents will find it credible to suggest that it is unaffordable for developers to contribute £100 per m² towards this for each of the 4,000 new homes or new commercial development on the site.

With the average house value in Tollerton around £375,000 it is even less credible to say to residents that a lower rate of say £10 per m² would also not be viable and that there should be a zero contribution.

The Parish Council does not agree with the proposal as it stands.

If as the Local Government Association state, the purpose of CIL is to support development by funding infrastructure that the local community and neighbourhoods want then this proposal does not achieve it.

Rushcliffe Borough Council should

- 1. expand the types of infrastructure included to community facilities and green infrastructure**
- 2. include needs identified by communities in the assessment of viability**
- 3. apply CIL across the whole Borough**
- 4. introduce a new lower rate eg £10 per m² for low viability areas**

or risk adopting a Policy that frustrates the reason for it existing – particularly in an area of its greatest need in Rushcliffe.