Top Wighay Farm Development Brief – Statement of Representations

(received from formal consultation undertaken 18/9/15 – 19/10/15)

In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (Section 11), a consultation exercise was undertaken on the draft "**Top Wighay Farm Development Brief**". The site is allocated for 1,000 new homes plus significant new economic development in Policy 2 of the Gedling Borough Aligned Core Strategy, Policy 2.

The consultation process is fully described in the Consultation Statement attached as Appendix 6 to the draft brief:

- In accordance with the Regulations, consultation letters were sent by either email or post to nearly 2,500 individuals and
 organisations in the Council's consultation database and to 75 neighbouring properties along Wighay Road and Annesley Road;
- Copies of the draft document were placed at the Civic Centre, Hucknall Library and Papplewick and Linby Village Hall. An electronic version of the draft document was available to view on the Council's website:
- 4 site notices were also placed at various positions near to and around the site; and
- A press notice was published in the Nottingham Post and Hucknall Despatch.

Various representations (letters and emails) were received from different consultees and neighbouring property owners during the 4-weeks consultation period. This document provides a summary of the main issues raised and the Borough Council's response and proposed changes (if applicable).

This "Statement of Representations" is prepared under the Town and Country Planning (Local Planning) (England) Regulations 2012. Subject to executive approval, the "**Statement of Representations**" and final version of the development brief will be adopted in accordance with the process described in the Council's Statement of Consultation (June 2014):

http://www.gedling.gov.uk/media/documents/planningbuildingcontrol/Appendix%20D%20-%20Statement%20of%20Consultation%20June%202014.pdf

Respondent Details	<u>Chapter/</u> <u>Paragraph</u>	Summary of Representations	Borough Council's Response
Nottinghamshire County Council (Nature Conservation)	General	No comments as all previous input has been addressed or accommodated.	Noted.
Homes and	Context	The site is important to the delivery of the ACS.	Noted.
Communities Agency	Site description	Notes the mix of housing and employment land and the potential for future development via the designation of safeguarded land.	Noted.
	Planning policy and obligations	The site should contribute CIL.	Agree . Any eligible planning applications received after the CIL implementation of date of 16 th October 2015 will be CIL liable.
	Site opportunities and constraints	Welcomes the sustainable approach to the development of the site. Would be worthwhile to record the need for energy efficiency standards via the current Building Regulation requirements.	Noted – no change.
	Development principles	Potential for employment measures to be put in place with the developer should be set out.	Agree – amend to include reference to the fact that GBC will seek to negotiate Local Labour Agreements within section 6.3.
The Coal Authority	Geo- environmental	The SPD sets out factual information relating to geotechnical considerations in section 5.7 which provides sufficient clarify.	Noted.
Erewash Borough Council	General	No comments	Noted.
Colin Powell (GBC Councillor)	Education	Education provision is likely to be inadequate and provided too late in the build.	The timing and nature of education provision will be considered through the determination of individual planning applications, with the advice of County Education and based on available capacity and identified needs at that time.

	Drainage	Consideration of drainage of the site in the brief appears to assume that the drainage system will need to go into the safeguarded site.	The brief refers to the importance of managing surface water runoff. It is anticipated that SUDS would be incorporated and include natural and artificial filtration systems to filter runoff from hard standing and highways prior to it eventually entering water courses. This is more a matter for a detailed drainage scheme as part of the planning application and we would be advised by the Environment Agency regarding limitations on the quantity and quality of surface water runoff rates.
	General - process	The brief appears to be developer led whilst the original brief, with the input of the steering group, reflected more the Council's aspirations for the site.	The brief has been drafted by AECOM and GBC planning officers with input from others via the stakeholder workshop
	Affordable housing	Will affordable housing be provided on or off site?	The wording of the brief allows for affordable housing to be provided either on or off site (in accordance with the Council's Affordable Housing SPD). Provision will be considered through the determination of individual planning applications and based on the requirement for affordable housing at that time as advised by the GBC Housing Needs team.
	Transport	The impact of the development on traffic levels in Papplewick is likely to be significant and needs to be considered in more detail in consultation with that community.	A Transport Assessment has been carried out to explore the likely mitigation measures for the site. Page 21 of the brief requires that planning applications will need to be accompanied by a transport assessment and travel plan and also take account of the transport modelling exercise for the whole site being undertaken by the landowner. There will be an opportunity for the community to comment on detailed development proposals at the planning application stage.
Nottinghamshire Fire and Rescue Service	General	No issues with the proposed development.	Noted.

Ben Bradley (ADC Councillor)	Planning policy and obligations	No reference to infrastructure being provided to residents IN A TIMELY MANNER. This means that the local area could have to cope with over 1000 additional residents before it is actually provided with the new infrastructure it needs. Hucknall especially is already on its knees in terms of school and GP provisions.	The timing of new infrastructure will be considered through the determination of planning applications which will be based on the needs at that point in time. Section 6.5 refers. The timing of new or improved education and health facilities will be based on the advice of Nottinghamshire County Council Education and the CCG.
	General	The Brief states that Gedling will work closely with Ashfield and County Councils. Ashfield's objections have been largely ignored to date. Officers at County Hall do not have full access to information even though it is their land. I am therefore sceptical as to whether this communication will improve.	The brief confirms that Ashfield DC will be consulted on any planning applications, particularly in terms of potential impact on local highways, public transport and community facilities. GBC has adopted a cross border protocol (in June 2014) to set out the principles guiding how GBC will work with its neighbouring authorities and the County Council when dealing with section 106 planning obligations relating to development which would have an impact on the services and facilities in a neighbouring authority. Neighbouring authorities were invited to comment on the protocol and ADC was supportive of the aims of the document.

Development of the safeguarded land is linked to substantial completion of development on the allocated land and I will voice major concerns if this is not the case.	Noted. However, the link between development of the safeguarded land and progress of development of the allocated land is being removed from the brief in response to another comment, as it is a matter for consideration through the preparation of a future development plan document. Notwithstanding the removal of this text, progress of development of the allocated land is likely to be an important consideration in deciding whether to allocate the safeguarded land for development. Any decision to allocate the safeguarded land would be the subject of extensive consultation.
The Brief says that this is not Green Belt Land. I would point out that it was in fact Green Belt Land, and has only ceased to be that because the Council has chosen to change it so that you can build on it.	The principle of the development of the site has already been established through the preparation of the Aligned Core Strategies. The site was taken out of the Green Belt in 2005 (part of the site was allocated in the Local Plan) and 2014 (the wider side was allocated in the Aligned Core Strategy).
Reference to "now successful neighbourhoods in their own right, but well integrated into Hucknall". I do not understand how this conclusion has been reached before anything has even been built there.	The vision for the site is lifted from the Aligned Core Strategy, which sets out the intentions for the site.
If the site is to be "well integrated in to Hucknall", a much deeper involvement from residents and Ashfield District Council will be needed, along with key assurances as to service provisions.	Involvement with residents, ADC and service provides will be ongoing as part of the planning application process.
Section 4.4 states that assessment of impacts can only be made at a planning application stage. This implies that the build will have a negative impact on the local area and that there will not be a jointed up approach to service provision.	The timing of new infrastructure will be considered through the determination of planning applications which will be based on the needs at that point in time. Section 6.5 refers. The purpose of the development brief is to specify the location of the key infrastructure and ensure a joined up approach to service provision.

	The Brief points out that the water table in this area is high. How can there possibly be a joined up and effective solution to this if individual developers all have their own agreements.	The brief refers to the importance of managing surface water runoff. It is anticipated that SUDS would be incorporated and include natural and artificial filtration systems to filter runoff from hard standing and highways prior to it eventually entering water courses. This is more a matter for a detailed drainage scheme as part of the planning application and we would be advised by the Environment Agency regarding limitations on the quantity and quality of surface water runoff rates.
	You say that "the development of the safeguarded land may provide an opportunity to develop", already talking about what to build on this additional land. Residents were told in a meeting that the safeguarded land was not part of your thinking and would not be looked at unless it was needed, yet here you are planning for its use.	The brief makes reference to the <u>potential</u> development of the safeguarded land and seeks to ensure that the development of the allocated site does not prejudice any future development of the safeguarded land. However the safeguarded land can only be brought forward through the preparation of a development plan document.
	You say that "developers are encouraged to contact UK Coal" but stop short of actually asking anyone to check whether these homes might subside in the future.	Developers are only required to consult UK Coal where there are known issues (such as where a proposal relates to a former colliery), otherwise this does not form part of the planning application process.
Health	In part 6.4 you say that the scale of the build does not justify health or community buildings. I would point out that the scale of this specific build is only half of that equation. It does not matter that there are only 800 houses, there are not 800 houses worth of space within the existing healthcare and community provisions. Additional healthcare facilities especially are vital for this site, or otherwise significant funding to provide new services within Hucknall itself.	The timing of new infrastructure will be considered through the determination of planning applications which will be based on the needs at that point in time. Section 6.5 refers. The need for new or improved health facilities will be based on advice from the CCG and informed by ongoing discussions between the Nottingham North and East CCG and Hucknall GPs about options for the future.

	The reality may well be that there is little public transport provision within this site. When talking about the road networks, you fail to recognise the huge potential impact on Linby or Papplewick and no safeguards are set out to mitigate this.	Page 21 of the brief requires that planning applications will need to be accompanied by a transport assessment and travel plan and also take account of the transport assessment for the whole site being undertaken by the landowner.
Education	There is no specific clause requiring that this school be built in good time to accommodate the early residents of the site, which will be required.	The timing and nature of education provision will be considered through the determination of individual planning applications, with the advice of County Education and based on available capacity and identified needs at that time.
Local Centre	The Brief sets out that the Local Centre should be accessible and visible, but then has positioned it hidden in the centre of the development where nobody will see it.	The Local Centre needs to serve the residents of the new development and be accessible and visible to those new residents.
Design principles	The plan states that this should be a 'self-sustaining community but fully integrated in to Hucknall'. Simply having a footpath between the two does not make them linked. The very fact that it is self-sustaining means that residents have no reason to venture in to Hucknall and nobody will go in to the site unless they live there, making it isolated.	The size of the site is such that it will need to include some infrastructure within it, but will also look to Hucknall for other supporting infrastructure (greater range of shops, secondary school, library etc).
General - process	This Brief talks about the vast amount of 'consulting' that took place in 2005 and 2008, but few residents recognise that as being accurate. I hope that this consultation will be an improvement and that comments will be taken on board.	Noted.

Gedling Borough Council (Scientific Officer)		Whilst the proposed development is unlikely to impinge on the Air Quality Management Area in Gedling Borough, the proposals could have an impact on other 'commuter routes' where air pollution may be a factor. An informal planning guidance document has been produced to set out how we might help decrease levels by incorporating mitigation measures into scheme design as standard. Consideration should be given to emissions mitigation, based on development size; to ensure the development is sustainable from an emissions (carbon/air pollution) point of view.	Reference is already made to the informal planning guidance document under the heading 'Climate Change' in section 5. For clarity, a new sub heading of 'Air Quality' will be added to help draw attention to the guidance.
Sport England	Open space	GBC's playing pitch strategy should inform the requirements for on-site facilities or off site contributions which would best meet the needs of new residents in terms of sports pitch provision. It is noted that an area is indicated, with the future specification to be agreed. The strategy should be used to provide information on the requirements.	Noted. The existing Supplementary Planning Guidance is in the process of being refreshed and this will inform the timing of new provision that is required.
		Sport England supports the joint use of the proposed school for use by both the school and the community, the proposed sports pitches (once the requirements are understood) should be adjacent to ensure an appropriate mass of facilities, it is not clear where the secondary school would be located.	Noted. Secondary school provision would be accommodated within existing schools.

The proposal indicates that contributions may be sought under section 106 to community sports facilities. It is not clear how this contribution will be evidenced as the authority has shelved the work on the built sports facilities strategy. It is unclear therefore if evidence is available to meet the section 122 tests. It is not clear if there is a planning obligation SPD which clearly states what will be funded under section 106 or CIL.	S106 contributions will be sought for open space but not for new built provision. New provision cannot be funded by both S106 and CIL. The Council's Regulation 123 list clearly states the projects that will be funded by CIL, which includes the contributions for secondary school provision for the Top Wighay Farm site.
CIL will be used to fund the secondary school proposal. SE understands that under s123 of CIL it states that a planning obligation may not constitute a reason for granting planning permission, your authority had a draft statement which clearly stated this June 2014 but it is not clear if this was retained in the adopted statement.	It is confirmed that the secondary school contributions for the site will be funded by CIL (section 4.4 of the brief refers). The reference to planning obligations is within the Community Infrastructure Levy and Section 106 Statement, which is not an adopted document but does remain as part of the supporting evidence.
The Sport England sports facilities calculator indicates that the proposal will generate a significant demand on sports facilities. Can this be met by the existing or are new or upgraded facilities required see attached Active design 2007 is noted as a reference document Sport England will be shortly launching an updated version (October 2015)	The proposal will generate demand for new open space provision.

Nottinghamshire Wildlife Trust	Local Wildlife Sites	Support the requirement for an ecology assessment plus proposals to 'protect and enhance existing ecological resources, create new features and secure their long-term management', and the use of conditions or legal agreements to secure long-term management.	Noted.
		Regarding the reference to Joe's Wood located on the safeguarded land we would like to see 'as far as possible' removed, so this reads: "Steps should be taken to ensure this is also protected from adverse impacts".	Agree – amend 3 rd paragraph of page 15 as suggested.
		With reference to the Gedling Borough Replacement Local Plan and NPPF Paragraph 17, Policy 17 of the Adopted Greater Nottingham Core Aligned Strategy should also be referenced:	Agree – amend 4 th and final paragraph of page 15 as suggested.
		We wish to see much stronger wording in relation to retention of the remaining part of Wighay Road Grassland Local Wildlife Site. Amend 'Plan D shows the areas that GBC will seek to retain (the eastern and central parts of the LWS)' by replacing 'seek', with 'shall expect to retain'.	Agree – amend 6 th paragraph of page 15 as suggested.
		Plan D refers to 2 'potential corridors.' Concerned that they are not guaranteed and would be unlikely to materialise. Page 16 states that the wildlife corridors 'should be created' but would recommend 'will be created'.	The reference to 'potential corridors' reflects flexibility regarding the precise location. Amend the written text (3 rd paragraph of page 16) to confirm that 'it is expected that a wildlife corridor is created'.
		We would not wish to see a Play Area being located on either of the LWS (we note that one is to be potentially located on Top Wighay Farm Drive LWS).	The location of the play areas will be confirmed at planning application stage.
		Strengthen wording to protect hedges and mature trees by removing statements such as 'where possible' from the SPD.	Whilst it is desirable to protect hedges and mature trees it is acknowledged that this may not be possible in all cases.

David Wilson Homes	Environment al Impact Assessment	The brief states that 'an Environmental Impact Assessment will be required to accompany any significant planning application and should encompass all the allocated land'. Clarity is needed on what classifies a planning application as 'significant'. Clarification is also required as to whether an EIA is to be provided by the landowner, or developers seeking planning permission on specific areas of land within the wider site. A more sensible approach would be for an EIA covering the whole site area to be produced, with developers providing assessments for their land interests which refer to the wider EIA.	Agree – the text will be worded to provide clarity. Where an Environmental Impact Assessment is not required similar information will still be obtained (contamination, noise etc) albeit in a different format. The format of the information provided will depend on the size of proposal and determined by a Screening Opinion). The extent of information required will be informed by a scoping exercise with input from specialist consultees. As such, environmental information is likely to be provided by a developer rather than the landowner. Section 3.1 states that the EIA should cover all of the allocated land.
	Local Wildlife Sites	The wording currently contradicts itself with regards to development on LWS. Clarity is needed on whether development could be acceptable subject to further and updated ecological surveys, or whether no development is acceptable on LWS from the outset.	Agree – delete the last sentence of the 5 th paragraph on page 15.
	con the prev	The location of the potential wildlife corridor should be reconsidered. The LWS could be connected further to the south inset from Wighay Road which would prevent wildlife corridors being located along the main transport route into the site.	The location of the wildlife corridor is intended to reflect and help protect the existing Local Wildlife Site.
	Housing	Section 6.2 gives the capacity as around 805 dwellings. However, the actual number of dwellings is unknown until planning applications are approved. The Transport Assessment for the wider site is based on 1,000 dwellings. Retaining the overall figure at 1,000 dwellings will allow for flexibility and ensures the Brief accords with the ACS.	The urban design work that has been undertaken as part of preparing the draft brief has indicated that 805 dwellings is the most appropriate figure (in addition to the dwellings that have already been granted planning permission to Strata Homes). It is important to include a realistic figure to ensure that the housing requirement set by the Aligned Core Strategy is met.

	Masterplan maps	The brief states that 'development proposals for all or part of the site should take full account of the Masterplan maps accompanying this text'. However, the 'masterplans' do not conform with conditional contracts already agreed on parcels of land for development. David Wilson Homes has a conditional contract for a parcel of land which will most likely form the gateway into the new development. GBC is well aware of this land as we are currently engaged in pre-application consultation regarding development on this site area. The Concept Layout Plan (Plan B) does <u>not</u> accord with our red line plan. It is vital that the 'Masterplans' accord with the landowners intentions, and existing developer interest to enable the development to be deliverable and to ensure contractural obligations are achievable.	It is considered that the layout of the site should be informed by planning principles and not contractual decisions made between the landowner and developers.
	Design principles - density	At 60 dph, it is considered that the Local Centre could have an over-bearing impact on the surrounding character areas. Enforcing 40 dph in certain areas does not provide flexibility for developers in a changing market. A guidance of '30-40' dwellings per hectare with an emphasis on the desirability of 40 dph would allow flexibility whilst retaining the aims of the Development Brief	By identifying some areas as suitable for 30 dph and others as suitable for 40 dph, areas of higher density are directed to certain parts of the site where a more urban feel is appropriate. The density specified is an average density for that area, and allows for flexibility within the area.
	NET	Object to the proposed safeguarded corridor for the NET extension. It is considered that the original proposed route, to the north of the site is more appropriate.	Amend 2 nd paragraph on page 22 to add 'However, as no firm alignment exists at the time of writing, the layout should allow for future flexibility.'
Linby cum Papplewick CE Primary School	Education	The timing of the building of the school in relation to the housing would be critical in the initial impact on numbers in other local schools, the effective start up and viability of the school, and the community of pupils it would serve (and as a result the environmental impact on travel to and from school and the vision for this location as a community hub).	The timing and nature of education provision will be considered through the determination of individual planning applications, with the advice of County Education and based on available capacity and identified needs at that time.

Roxylight	Objectives	We support a 'strategic approach' to the development of the Top Wighay Farm site. The Council does not have a 5-year housing land supply and it is critical that a comprehensive and integrated master planning approach is taken to the development of Top Wighay Farm (in accordance with the Aligned Core Strategy). A comprehensive approach is also vital to properly quantify the physical and community infrastructure required for the entire site to provide a sound basis for taking an equitable approach to the funding, delivery and management of such infrastructure.	Noted – no change.
	General - Strata	Surprised by decision to approve the Strata Homes proposal, which was submitted in isolation, despite objections from Linby Parish Council and Ashfield District Council and contrary to the existing development brief that seeks a comprehensive design concept for the allocated and safeguarded land at Top Wighay Farm at the start of the design process and Policy H6 of the Local Plan. This brings into question the importance and weight given to the Development Brief as a material consideration.	Planning permission has been granted for the Strata Homes proposal and the justification for the decision is set out in the committee report. Amend - The design concept would be required if the safeguarded land was considered for development, not at this stage. The text in section 3.2 will be amended to clarify, by adding the words 'should all or part of the safeguarded land be developed' to the end of the 2 nd sentence of the 3 rd paragraph of section 3.2.
	Housing - capacity	A potential for 805 dwellings being a 'maximum' not an 'optimum' on the site does nothing to assist: a) the delivery of the spatial strategy; b) the delivery of 7,250 homes in Gedling to 2028; c) the provision of a 5-year housing land supply in the Borough; and d) the provision of the necessary infrastructure. In these respects, the Brief is inconsistent with the Aligned Core Strategy.	Section 6.2 explains the reasons for the reduction in capacity. This represents a reduction of approximately 150 dwellings (taking account of the Strata permission) in relation to the Aligned Core Strategy figure.

General	The Brief should also refer to other evidence of the suitability of land at Top Wighay Farm for strategic scale development, including the Appraisal of Sustainable Urban Extensions in June 2008 and the Greater Nottingham Sustainable Locations for Growth in 2010.	The development brief is intended to be a concise document used to guide the future development of the site, rather than a comprehensive account of the history of the site.
Safeguarded land	We note the comments in the Brief about the 'safeguarded land'. We consider that a comprehensive approach to the whole of the allocated and safeguarded land at Top Wighay Farm rather than the short-term incremental and piecemeal approach taken by the Council hitherto would satisfy local policy requirements.	The development brief allows for the development of the safeguarded land at some point in the future (if it is allocated for development through the preparation of a development plan document) but does not assume that it will do.
	We support the statement that the planning of the development on the 'allocated land' should not prejudice future development on the 'safeguarded land'.	Noted – no change.
	We are also pleased to see that an assessment and comprehensive design concept should be prepared for the allocated and safeguarded land at 'the start of the design process.' We and our clients look forward to being involved in such a process and assessment at the outset, notwithstanding the unfortunate Strata Homes permission.	Amend - The design concept would be required if the safeguarded land was considered for development, not at this stage. The text in section 3.2 will be amended to clarify.
	The development of the safeguarded land should not be linked to the substantial completion of development on the allocated land. This would be unduly restrictive to potential future options available to the Council to identify suitable sites for housing and related development and should be omitted.	Agree – this is a matter for consideration through the preparation of a future development plan document. Delete last sentence of the last paragraph on page 8.

		The 'safeguarded land' was removed from the Green Belt and safeguarded in the Replacement Local Plan as first reserve in case Gedling Colliery/Chase Farm did not progress as quickly as anticipated.	Noted. However, since the adoption of the Local Plan planning permission has been granted for the Teal Close site and a planning application for the Gedling Colliery site has been granted subject to the signing of the section 106 agreement.
	Green Belt	We support the potential for examining the Green Belt land for its potential use as public open space, recreation and other compatible "open" uses in order to optimise the development potential of the allocated and other developable land (i.e. safeguarded land).	Noted – no change.
	Planning obligations	The Council's approach to development at Top Wighay Farm, with a piecemeal approach, reduced capacity and densities and a high CIL charge will fail to deliver the necessary development and infrastructure.	The purpose of the development brief is to ensure that a comprehensive rather than piecemeal approach is taken to future development. The introduction of CIL has been debated at examination. The stated capacity reflects the need to include a realistic figure to ensure that the housing figure set by the Aligned Core Strategy is met. This is not a matter for the development brief. The opportunity to debate assumptions relating to CIL was through the CIL examination process.
		We consider that the CIL assumption that 75% of the total area is developable is without basis, is based on an under-estimate of likely average density (28 dph) and is unrealistically optimistic. Deliverability is likely to be affected, unless densities are maximised, the developable land is increased and a more realistic view is taken of the cost and affordability of the required package of supporting infrastructure.	The densities stated are not maxima and could be increased if the overarching design principles are still met.

	Climate change	It is premature to set out clear requirements for meeting zero/low carbon standards on the development. Developing an energy strategy should naturally develop with the project through identifying needs and requirements of the final development and end users. The development of an energy strategy is therefore an iterative process with various stages that inform a flexible strategy based on the progression of the masterplan and development timeline as well as the changing planning and delivery landscape through the lifetime of the development.	It is not considered that the draft brief sets any clear requirements. Section 5.1 identifies that land may possibly be required and the use of innovative technologies should be explored through planning applications.
	Housing	The reduced capacity and lower density is completely at odds with the existing adopted Development Brief, which required (Parag 2.15) that the density should be no more than 50 dph. This should be retained to ensure that there is an effective use of land, sustainable development can be delivered and the housing trajectory is met. If this is not achieved, additional land should be allocated at Top Wighay Farm through the Local Plan Part 2 process.	The reasons for the reduced capacity figure are clearly set out in section 6.2 and in particular reflect the more detailed urban design work that has been undertaken. The need for additional land to meet the Council's housing requirement will be considered through the Local Plan Part 2 process.
	Employment	The range of employment uses is too narrow for the market and should include the potential to include suitable D1 and/or D2 uses to complement the other commercial uses and adjacent residential development.	The range of uses reflects Policy 4 of the Aligned Core Strategy and its supporting evidence. Other uses will be considered on their merits.
	Park and Ride	The potential need to accommodate a Park and Ride facility on the site must be addressed and resolved before a master plan is provided for the site.	The case for a Park and Ride site on the site was considered as part of the Transport Assessment for the site. However, it is concluded that the level of usage would be very low and such a facility would therefore be financially unviable. A Park and Ride facility is therefore not recommended as part of the mitigation for the site.

Health	With the private financing of GP surgeries, we question the justification for contributions as part of s106 negotiations.	The need for new or improved health facilities will be based on advice from the CCG and informed by the Hucknall Premises Strategy which is being prepared.
Delivery and phasing	There is no real delivery or phasing information contained in this section nor are sufficient safeguards identified to require developers to make a proportionate contribution to the provision of wider infrastructure requirements that are necessary to enable the comprehensive development of the whole allocation.	The timing of new infrastructure will be considered through the determination of planning applications which will be based on the needs at that point in time. Section 6.5 refers. It is not possible to anticipate future needs at this stage.
Design	The design principles for the site articulated in the Brief do not take account of the vision for Top Wighay Farm.	It is considered that the design principles take account of the vision. Further consideration will be given to detailed design issues through the determination of planning applications.
Density	We consider the Council should not follow the precedent set for the Strata Homes approval and plan for higher numbers and a minimum of 1,000 dwellings on the site (at about 37 dph overall). Otherwise, this brings into question: a) the integrity of the planning process; b) the value of the Brief; and c) the delivery of the number of homes and supporting infrastructure envisaged by the Replacement Local Plan, Aligned Core Strategy and Development Brief.	The reasons for the reduced capacity figure are clearly set out in section 6.2 and in particular reflect the more detailed urban design work that has been undertaken.

Five year land supply	The Council is unable to demonstrate a five year housing land supply at present such that policies for the supply of housing cannot be considered up-to-date. We also question the validity of using a 5% buffer in light of the persistent under-delivery of housing in Gedling Borough over the last eight years.	This is not a matter for the development brief.
	Top Wighay Farm is potentially delivering low-density, piecemeal development, which is undesirable in terms of delivering the homes, jobs, community infrastructure and sustainable urban extension envisaged in the Aligned Core Strategy.	The Council is unable to control how the site comes forward for development. However, the purpose of the brief is to encourage a strategic approach to development.
Plan B – Concept Layout Plan	There is no reference to the potential for a Park and Ride facility on the site, no relationship to the safeguarded land for the possible NET extension and a fragmentation of the neighbourhood centre with separation of the employment land, primary school and local centre, which is inadvisable in terms of building a community and social cohesion.	The case for a Park and Ride site on the site was considered as part of the Transport Assessment for the site. However, it is concluded that the level of usage would be very low and such a facility would therefore be financially unviable. A Park and Ride facility is therefore not recommended as part of the mitigation for the site. At this stage, there is no proposal to extend the NET into the site. However, the text makes provision for an automaion about the site.
Plan I – Key Movement Plan	The plan fails to satisfactorily integrate and show the NET and its potential benefits in improving sustainable transport to the site	extension should one come forward in the future. The development is not predicated on the provision of a tram extension. It would be prohibitively expensive to require the TWF site to provide a tram extension. In the longer term, and should additional development be allocated around the TWF site, then there could be sufficient demand to make a tram extension commercially viable.

Nottinghamshire County Council (Public Health)	Health	The brief makes reference to healthcare infrastructure (having linked with Nottingham North and East CCG) however it does not make reference to the importance of promoting healthier lifestyles to keep the population healthy and free from illness and disease.	It is considered that the content of the development brief in conjunction with the policies contained in the Aligned Core Strategy and Replacement Local Plan support the promotion of healthy communities, in relation to safe and accessible environments, high quality public spaces, recreational space, community facilities and public rights of way.
		Given a development of this scale it is of concern that a Health Impact Assessment (HIA) is not to be undertaken so that health and wellbeing issues are embedded, to ensure that this development does not exacerbate any health inequalities. Any negative impacts on health (particularly for the most vulnerable) should be avoided, reduced or mitigated and health and wellbeing promoted. The Public Health in Planning Good Practice Guide recommends that a health impact checklist should be submitted for major developments.	Since the preparation of the draft development brief, Cabinet agreed on 29th September 2016 to use the Checklist for Planning and Health (which forms part of the Spatial Planning for the Health and Wellbeing of Nottinghamshire Strategy) to assess planning applications and to help to inform local plan preparation.

Nottinghamshire County Council (landscape)	Landscape	This document should show objectives shaping the future development of the site and show a clear thought process from site survey through to analysis and exploration of opportunities/constraints and how these link in with the surrounding area, wider site context and future demands.	As set out in section 2 of the brief, its purpose is to amplify local plan policies, promote sustainable development, identify other planning issues and clarify the requirement for planning obligations.
		The maps should include a drawing of the site's context and the wider settlement pattern and built development surrounding it. From this a site development brief should be produced accompanied by an overall master plan informed by an analysis of baseline data against various planning policies /development planning documents along with a strong vision for the future development.	It is not intended to comprise out a detailed masterplanning exercise, rather to set out key parameters to ensure that a strategic approach is taken to the development of the site.
		The draft brief has used landscape issues as a subsidiary to the main development rather than as the element that links all the other topics together.	
		The green infrastructure shown on Plan D is insufficient and the design should address site circulation and linkage to public transport; location of different types of development & land use; site drainage, blue infrastructure, inclusion of SUD features; visual impacts; siting of development to mitigate adverse landscape and strengthening landscape character; the interface of the site with the surrounding landscape; increasing the area and linking biodiversity; and a design that helps provide a stronger identity and sense of place to this site.	The location of different types of development and land use are shown on the accompanying plans.

NET The proposed core open space to the eastern edge is a safeguarded route for the NET on Plan I.	At this stage, there is no proposal to extend the NET into the site. However, the text makes provision for an extension should one come forward in the future. Any extension to the NET is likely only to be justified on the basis of additional land coming forward for development and, as such, the open space provision could be relocated within the additional land if that was the case.
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Nottinghamshire County Council (Reclamation)	Geo- environmental considerations	The development brief indicates a requirement for a phase one desk study with the presence of landfilling in the area, we would strongly endorse this approach.	Noted – no change.
		A conceptual site model for the site should be developed through the preparation of a phase one desk study to assess the environmental and human health risks posed by pollutant linkages at the site. Reference should be made to the Environment Agency's Model Procedures for the management of land contamination CLR11 and BS10175:2011+A1:2013, Investigation of potentially contaminated sites: Code of Practice.	It is agreed that it is helpful to provide more detail on what is required in relation to contamination. However, the text should not make reference to specific documents in case this is amended or withdrawn in the future.
		Within this document clause 6 refers to a desk study and site reconnaissance. The BS document also refers to the development of a conceptual site model to assess the potential for risk from contamination and the development of an investigation strategy to assess those risks. Once the phase one desk study has been completed a site investigation can be designed to investigate the identified pollutant linkages. The investigation could also be integrated with the geotechnical investigation required for ground condition assessment for foundation design. The desk study will also provide information regarding drainage and flooding issues, including the potential for soakaways. The drainage of the site would need to be careful to consider off-site disposal of surface waters, there is anecdotal information relating to the exceedance of capacity along the Linby Trial and beyond.	Amend first paragraph of section 5.7 to read:- Gedling Borough Council's Public Protection service requires a phased risk based land contamination assessment be carried out in accordance with relevant guidance (i.e. British Standards). An assessment of the former brickworks site on Wighay Road (now forming part of the Wighay Road Grassland) was undertaken in May 2006 by Ecus Limited for Gedling Borough Council, and this recommended further assessment works. In other parts of the site, it is envisaged that a Tier 1 assessment (including desk top and site walk over) alone would be sufficient, in the first instance.

Nottinghamshire County Council (highways)	Transport	The text should be revised to make it clear how any off site transport mitigation works are to be secured particularly as the development is likely to come forward in a piecemeal fashion. The text refers to two principal points of access both to the A611 Annesley Road. For the avoidance of doubt, the text should be amended to state that no direct vehicular access will be permitted from the site to the B6011 Wighay Road. The text should also be modified to state that no through	Agree - Amend the text to explain that the framework for securing the necessary transport mitigation measures will be determined by the LPA in consultation with the local highway authority. Agree – add a new paragraph to page 21 to read 'For the avoidance of doubt, no direct vehicular access will be permitted from the site to the B6011 Wighay Road' and no through vehicular connection will be permitted between the Top Wighay Farm site and the Strata Homes development on Wighay Road, although cycling and walking connections will be encouraged.'
		vehicular connection will be permitted between the Top Wighay Farm Site and the recently approved Strata Homes development on Wighay Road, although cycling and walking connections will be encouraged.	and waiking connections will be encouraged.
	Park and Ride	The text should be amended to make it clear that this would be a bus based P & R site and would involve bus services ferrying passengers to Hucknall Town centre (as opposed to Nottingham) and the tram and rail stations in Hucknall. In the longer term if a tram extension were secured across the TWF site then the P & R site could become a dedicated facility for the tram instead.	The case for a Park and Ride site on the site was considered as part of the Transport Assessment for the site. However, it is concluded that the level of usage would be very low and such a facility would therefore be financially unviable. A Park and Ride facility is therefore not recommended as part of the mitigation for the site.

NET	The NET safeguarded corridor shares a route which is also shown as essential open space. If NET were extended this would result in a loss of open space.	Noted. However, any extension to the NET is likely only to be justified on the basis of additional land coming forward for development and, as such, the open space provision could be relocated within the additional land if that was the case.
	The internal road layout of the development needs to be discussed with the City Council's NET team to make sure that the route of NET can be extended on street both in a westerly direction as far as the A611 or in a northerly direction as far as the safeguarded land i.e. to permit maximum flexibility for future NET options.	Amend. The brief will be amended to refer to the County Council's technical document which sets the requirements for the internal road layout to accommodate a future NET extension.
	Nottinghamshire County Council Transport and Travel Services (TTS) support the document and its references to the importance of ensuring sustainable transport links are provided to the site by way of Section 106 contributions.	Noted.
	TTS supports the documents reference to the 6C's guidelines and would expect the developer to provide quality bus stop facilities throughout the site as part of the planning obligations.	Noted.

Newstead Abbey Ward Members. Councillors - Bruce Andrews, Chris	General	The Ward Members welcome brief as this is a site of strategic importance in the delivery of the Boroughs housing targets.	Noted.
Barnfather & Colin Powell		There is disappointment however that there has been limited involvement by the Members and Local Community in the drawing up of the brief. The previous brief adopted in 2008 was drawn up by Officers and Members working together.	The process has followed and exceeded the Regulations relating to preparation of Supplementary Planning Documents. An additional workshop has been held and a presentation was held on the brief to encourage discussion and engagement. Involvement with residents, ADC and service providers will be ongoing as part of the planning application process.
		It is welcomed however that the residential allocation to the site has been reduced from 1000 homes to 805.	Noted.
		It is equally welcomed that there is a recognition of the requirement to retain a Green Belt buffer zone between the conservation village of Linby and the development site.	Noted.

Layout and	The development should be a separate entity (Wighay	The site is identified as a sustainable urban extension in
design	Village) that reflects the rural environment rather than just another edge of town estate for Hucknall. A reasonably self-sufficient community which enhances the economic wellbeing of Hucknall by its spending power, but is not absorbed by it, that still looks to Gedling rather than Ashfield as its local authority base.	the Aligned Core Strategy and therefore needs to relate well to Hucknall, although the brief recognises the need to reflect the local distinctiveness of Linby and Papplewick. The size of the site is such that some areas will have a more rural outlook and lower density whereas others will be of a higher density and be more urban in nature.
	Whilst an appropriate mix of housing is welcomed, the possible inclusion of three storey properties is unwelcome.	The development brief allows for 3 storey properties in one limited part of the site.
	Modern three-storey properties would be incongruous within the area and certainly out of keeping with the traditional properties of Linby village. Similarly reference to residential properties above retail units seems to be a throw-back to the 60's when retailers 'lived above the shop'.	The brief sets a density of 60 dph in one limited part of the site. This may or may not be achieved by providing residential properties above retail units.
	We welcome the clear delineation of employment access and road usage from that of residential use and the recognition of the need to restrict the ability of commercial traffic to use residential roads as a 'short-cut'.	Noted.
	We welcome the outline for public open space to include informal play space, allotment land and children's play areas.	Noted.

Infrastructui	It is disappointing that the brief does not insist on clear plans being agreed for the whole site to show the locations of the necessary infrastructure such as the school, local centre, open spaces and drainage ponds. In particular the need for suitable mitigation of surface water flooding should be addressed.	The brief already shows clear locations for the school, local centre and open spaces. The brief refers to the importance of managing surface water runoff. It is anticipated that SUDs would be incorporated and include natural and artificial filtration systems to filter runoff from hard standing and highways prior to it eventually entering water courses. This is more a matter for a detailed drainage scheme as part of the planning application and we would be advised by the Environment Agency regards limitations on the quantity and quality of surface water runoff rates.
	The timing of the provision of such infrastructure is critical, as in the case of the school it is known that all local schools are currently over-subscribed.	The timing and nature of education provision will be considered through the determination of individual planning applications, with the advice of County Education and based on available capacity and identified needs at that time.
	It is also important to recognize that whilst the site may not require its own doctors surgery there is currently considerable pressure on NHS services within Hucknall.	Noted.
	In addition the type of community infrastructure will very much depend on the type of development we are seeking to create. (See comments under Layout & Design)	Noted.

Traf		Once the strategic traffic assessment has been completed, the impact of traffic on the Conservation Villages of Papplewick and Linby should be minimised. Involvement of the local communities in looking at possible measures to mitigate any increase in traffic flows is desirable.	There will be an opportunity for local communities to comment on mitigation measures through the planning application process.
		It is disappointing to note that despite requests being made at the Workshop that the brief should make it clear, that no vehicular movement between the Strata development and the rest of the site should be allowed, this is not made clear within the brief.	Agree – add a new paragraph to page 21 to read 'For the avoidance of doubt, no direct vehicular access will be permitted from the site to the B6011 Wighay Road' and no through vehicular connection will be permitted between the Top Wighay Farm site and the Strata Homes development on Wighay Road, although cycling and walking connections will be encouraged.'
	using	It is difficult to see how the provision of affordable houses on this site is going to satisfy the affordable housing need in Gedling, which is primarily focussed on the Arnold and Carlton areas. It is pleasing to see that consideration of a commuted sum being paid by developers to use in those parts of the borough where the demand exists is noted.	Noted – no change.
Emp		Members understand that the provision of employment land on the site in theory makes the site more sustainable and addresses a shortage of employment land within the Borough, but consideration should be given to the current availability of such land in the immediate vicinity.	The principle of the employment land has already been established through the preparation of the Aligned Core Strategy.
		The likelihood that the skill sets of the people living in the new houses match those required for the employment land is by no means clear and there is no obvious correlation therefore between the residential and employment areas of the site.	

	Process	All the points made have been raised at the recent Workshops and it is disappointing that they appear from this draft to have been rejected despite positive comments at the time. It is also disappointing that once again Elected Members of the Council have no other recourse than the Public Consultation route to have their voices heard.	The process has followed and exceeded the Regulations relating to preparation of Supplementary Planning Documents. An additional workshop has been held and a presentation was held on the brief to encourage discussion and engagement. Involvement with residents, ADC and service providers will be ongoing as part of the planning application process.
Linby Parish Council	General	Linby Parish Council welcome the fact that a brief for the site is deemed necessary as this is a site of strategic importance. We are disappointed, however that there has been limited involvement by the parish council and the local community in the drawing up of the brief. We would like to convey that many points seemed to have not been incorporated into the draft and we feel this is an opportunity missed. We would like to feel this is the first draft and a revised draft will be consulted on when many points that have been identified are incorporated into the brief. Linby Parish Council would also like to express that they are keen to be involved with any future Stakeholder Meetings with regards this brief, especially as we are planning to work towards a neighbourhood plan which will incorporate the Top Wighay site	The process has followed and exceeded the Regulations relating to preparation of Supplementary Planning Documents. An additional workshop has been held and a presentation was held on the brief to encourage discussion and engagement. Involvement with residents, ADC and service providers will be ongoing as part of the planning application process. Noted

Objectives	You state 'cumulative' refers both to the cumulative impacts of individual developments within strategic allocations as well as to the cumulative impacts of different allocations across the Borough. However, this site will impact significantly on the infrastructure within Hucknall which falls within Ashfield District Council and thus should be reflected in the wording - cumulative' refers both to the cumulative impacts of individual developments within strategic allocations as well as to the cumulative impacts of different allocations across the Borough and the neighbouring borough (ADC) We would like to reinforce that the plan adheres to Policy H15 of the Replacement Local Plan so that the site has cohesion.	Agree. Amend the 6 th paragraph of section 2.1 to read 'Here, 'cumulative' refers both to the cumulative impacts of individual developments within strategic allocations as well as to the cumulative impacts of different allocations across the Borough and adjoining boroughs.
History of	The parish council feels the extensive modelling work you refer to in the document is unclear. It refers to infrastructure impacts, however, on raising the question what you were referring to via email on the 12th October; I was informed it was mainly transport. The paragraph is ambiguous and would have benefitted from the document been referenced.	This text in section 2.2 refers to the consideration of the site through the ACS process. The key published document that considered cumulative impacts was the transport modelling work, although other assessments were undertaken (including as part of the Habitat Regulations Assessment). As this text relates to the history of the site rather than setting out requirements for the future development of the site, it is not considered necessary to amend the text to provide more detail.

Nature conservation	Linby Parish Council fully supports the comments made by Nottinghamshire Wildlife Trust.	Noted.
	We would like to be reassured that much more importance is given to hedgerows and mature oaks which in turn will help enhance the visual aspect of the site. We would like to see the document state that "hedgerows and mature trees should be preserved and enhanced as landscape and ecological features".	Whilst it is desirable to protect hedges and mature trees it is acknowledged that this may not be possible in all cases. As such, no changes are proposed to the current wording.
	It is also vital that existing LWS are not further adversely affected by development.	Agree. The reference to Joe's Wood will be amended to read "Steps should be taken to ensure this is also protected from adverse impacts".
		Agree. The reference to the remaining part of Wighay Road Grassland will be amended to read 'Plan D shows the areas that GBC shall expect to retain (the eastern and central parts of the LWS)'.
	The brief states "to the south, the character of Hucknall is strongly influenced by the red brick vernacular of the Victorian period. The density of the area is medium to high due to the height (generally 2.5-3 storeys". It is not clear where you are referring to. Such heights are not the essential feature of those residential buildings to the south of the site in the Wighay Road and Annesley Road areas. In paragraph 1 you refer to "the urban form". This does not seem to be appropriate wording for describing Linby village.	The size of the site is such that some areas will have a more rural outlook and lower density whereas others will be of a higher density and be more urban in nature.

Employment	There is not a demand for employment land in this location, given land at Sherwood Park and land to the south west of the site. If it remains vacant it will negatively affect the sustainability of the site. To what extent has the provision of the employment land been done in collaboration with Ashfield District Council? Required under the duty to co-operate. It is not clear from the brief that the skill sets of the people living in the new houses match those required for the employment land.	The principle of the employment land was established through the preparation of the Aligned Core Strategy. The Inspector was satisfied that the duty to co-operate had been met.
Supporting infrastructure	The timing of the provision of such infrastructure is critical. It is known that all local primary schools are currently over-subscribed. Both secondary schools will be full by 2018 with current birth rates (both are Academy Schools and fall outside the jurisdiction of the Local Education Authority).	The timing and nature of education provision will be considered through the determination of individual planning applications, with the advice of County Education and based on available capacity and identified needs at that time.
	Whilst the site may not require its own doctor's surgery there is currently considerable pressure on NHS services within Hucknall. The CCG will not be producing their Premises Strategy for Hucknall until the end of December so we feel concerned that the brief is been rushed without all the facts in place.	The need for new or improved health facilities will be based on advice from the CCG and informed by ongoing discussions between the Nottingham North and East CCG and Hucknall GPs about options for the future. It is now understood that the Premises Strategy is a high level strategic document.
	Local facilities are to capacity and this has not been addressed in the brief. To ensure sustainable development, this brief should have identified and then reflected the needs of the local community. This has not been done.	Through determining planning applications, S106 contributions can be sought where these meet the tests in Regulations 122 and 123 of the CIL Regulations 2010. In addition, CIL money passed to Linby Parish Council can be used to provide or support local infrastructure.

Transport

At the ACS hearing sessions, the public and the Planning Inspector were assured that before any development was considered on this site; a fully detailed transport assessment would be undertaken and sustainable transport provisions (cycling and walking) would form the basis of proposals. The local road network is very constrained, extremely busy and locally dangerous. The brief does not address this in any way. Currently, local roads cannot be safely accessed by pedestrians and cyclists. The brief does not cover this aspect. School children cannot safely cross Wighay Road to access local primary school (north of the road) or secondary school (south of the road). The brief does not consider this. It states on page 22 under cycling and walking "cycle links along Wighay Road to what is known locally as the 'Black Pad' (the link from Wighay Road to Linby Walk) should be improved". The maps do not show how the footpath south of the Strata Homes Development will connect to the footpath closer to the village of Linby. At the moment there is an area of no man's land and this has not been addressed in the brief. Locally, children will increasingly have to be driven to schools – thereby further exacerbating an existing problem. Well communicated problems already exist within our local road network. particularly affecting the smaller roads of Linby and Papplewick. The brief neither recognises this, nor reflects this. The brief has failed to reflect wider access problems within the area.

It is disappointing to note that despite requests being made at the Workshop that the brief should make it clear, that no vehicular movement between the Strata development and the rest of the site should be allowed, this is not made clear within the brief.

A Transport Assessment has been carried out to explore the likely mitigation measures for the site. This has looked at the wider 'Area of Influence' and recommended improvements to a number of junctions.

The Transport Assessment sets out how linkages from the site to the wider cycling and walking network will be required. **Agree** to amend the text to note the requirements of the TA in this regard.

Agree – add a new paragraph to page 21 to read 'For the avoidance of doubt, no direct vehicular access will be permitted from the site to the B6011 Wighay Road' and no through vehicular connection will be permitted between the Top Wighay Farm site and the Strata Homes development on Wighay Road, although cycling and walking connections will be encouraged.'

Park and rid	e The brief does not show where a park and ride would be situated.	The case for a Park and Ride site on the site was considered as part of the Transport Assessment for the site. However, it is concluded that the level of usage would be very low and such a facility would therefore be financially unviable. A Park and Ride facility is therefore not recommended as part of the mitigation for the site.
Flooding ar drainage	There should be a strategic approach to surface water flooding. This would have been a great opportunity to look at the necessity for balancing ponds which not only help with surface water flooding but can add to the bio diversity within the area. The upkeep of any swales should be clarified. The brief should address the use of silt traps to avoid exacerbating issues with silt in the Linby Docks.	The brief refers to the importance of managing surface water runoff. It is anticipated that SUDS would be incorporated and include natural and artificial filtration systems to filter runoff from hard standing and highways prior to it eventually entering water courses. This is more a matter for a detailed drainage scheme as part of the planning application and we would be advised by the Environment Agency regarding limitations on the quantity and quality of surface water runoff rates.
Connectivit	The site currently is positioned in isolation from Hucknall. Wighay Road is extremely busy, being a rat-run to and from Junction 27 of the M1. Without detailed network improvements, along with sustained local mitigation measures, the development site will not be connected to adjacent areas.	Page 21 of the brief requires that planning applications will need to be accompanied by a transport assessment and travel plan and also take account of the transport modelling exercise for the whole site being undertaken by the landowner.
	Currently there are no suitable network links for walkers or cyclists to access Hucknall town, or the local villages. The brief does not detail this.	The Transport Assessment sets out how linkages from the site to the wider cycling and walking network will be required. Agree to amend the text to note the requirements of the TA in this regard.

	Design	To soften the visual impact of the development, any three- storey houses should be located away from the boundaries (Sheet D05, R1 and R2 should be limited to two-storey). There are limited three-storey properties in the local area and new dwellings should be more sympathetically designed.	The development brief allows for 3 storey properties in certain areas of the site. Agree to amend the text to locate any 3 storey houses away from the boundaries.
		Flats are proposed in the central area. This is a rural location and provision of flats would seem incongruous. This seems to be at odds with the section on page 27 that 'The development provides an opportunity to reflect the village-scale vernacular architecture and local distinctiveness of Linby & Papplewick'.	The brief sets a density of 60 dph in one limited part of the site. One way to achieve this might be by providing residential properties above retail units.
	General	It is welcomed that the residential allocation to the site has been reduced to 805 homes.	Noted
		It is welcomed that a Green Belt buffer zone is being retained between the conservation village of Linby and the development site.	Noted.
Natural England	Landscape	We are pleased reference has been made to the relevant National and Local Landscape Character Assessments. Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. Landscape planting at the boundary of the site can help to screen the built development and integrate the development within its rural setting.	Noted.

Soil and
agricultural
land quality

It is important that the soil resources are protected and used sustainably. Developers should consider the following issues as part of the application:

- 1. The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved.
- 2. If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres.
- 3. The application should provide details of how any adverse impacts on soils can be minimised. Further guidance is contained in the *Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites*.

This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see www.magic.gov.uk. Natural England Technical Information Note 049 - Agricultural Land Classification: protecting the best and most versatile agricultural land also contains useful background information.

Soil and agricultural land was considered as part of the Sustainability Appraisal for the Aligned Core Strategy which allocated the site and considered through planning applications. Reference to 'DEFRA Construction Code of Practice for the Sustainable Use of Soil on Development Sites' will be made in Section 5.7.

Green infrastructure	The allocation is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. As such, Natural England is pleased GI will be incorporated into the development of the site. We strongly encourage you to share Natural England advice on Green Infrastructure with future applicants to maximise opportunities to incorporate green infrastructure during the development of the detailed proposals. Additional evidence and case studies on green infrastructure, including the economic benefits of GI can be found on the Natural England Green Infrastructure web pages.	Agree - Include reference to Nature England website in section 7.6 and appendix 2.
Biodiversity	Future proposals should consider the potential impacts on Linby Quarries SSSI, particularly in relation to any interference with water supply mechanisms and changes to water quality that could impact the SSSI, this is reflected in Natural England's SSSI Impact Risk Zones.	Agree – amend brief to require developers to refer to Natural England's SSSI Impact Risk Zones and the associated user guidance which are available via the MAGIC website http://www.magic.gov.uk/
	Proposals should be accompanied by information to demonstrate they have considered the likely impacts on habitats which have been identified as of importance for breeding nightjar and woodlark and have tried to minimise any potential effects as far as possible, the attached Advice Note provides further details of the suggested risk based approach.	Section 5.5 of the development brief already makes reference to the prospective Special Protection Area and the Natural England Advice Note.
	We are pleased the brief and concept layout plans encourage the establishment of a coherent ecological network by creating wildlife corridors to connect the Local Wildlife Sites and other open spaces across the site.	Noted.

	Green roofs	Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.	Section 6.4 already includes reference to the benefits of green roofs in enhancing biodiversity and sustainability.
Harworth Estates		It is requested that part of the site is identified for further residential development of approximately twelve units, together with an area of open space (to be retained as a Local Wildlife Site). This would provide a natural extension to the Strata development with the density and type of housing proposed similar to that recently approved at the site and create a clearly defined built edge to the development and encourage natural surveillance at the site. The majority of the Local Wildlife Site (1.01 hectares) would be retained in situ (offered to a Local Wildlife Trust or Management Company) to ensure the long term management and maintenance of the site.	The allocation of land for development is not a matter for a development brief. The area of land in question is identified in the Aligned Core Strategy (adopted in September 2014) as land that GBC shall expect to retain as part of the Local Wildlife Site.

Ashfield District Council	Allocation objectives and process	The Council is supportive of the objectives and process of undertaking the development brief as a SPD in order to ensure the comprehensive and coordinated development of the site, subject to some variations to the text set out in question 4. The Council supports the principle of working together regarding this aspect and the emphasis should be on "working closely with all interest parties" rather than "will look to work closely". Ashfield considers that a Memorandum of Agreement should be agreed and signed by both Ashfield District Council and Gedling Borough Council in this context.	Agree – the wording will be amended to read 'will work closely with interested parties including' GBC has already adopted a cross-border protocol (in June 2014) to set out the principles guiding how GBC will work with its neighbouring authorities and the County Council when dealing with section 106 planning obligations relating to development which would have an impact on the services and facilities in a neighbouring
			authority. Neighbouring authorities were invited to comment on the protocol and ADC was supportive of the aims of the document. It is therefore not considered necessary to agree a separate Memorandum of Agreement.
	Consultation process	In relation to the following paragraph Ashfield would propose that the wording is amended to reflect the following: As detailed proposals emerge, the Borough Council will undertake further dialogue "work" with Ashfield District Council to maximise the potential for the development to support and relate to relevant projects and developments in Ashfield, including Hucknall's ongoing Town Centre regeneration.	GBC's cross border protocol (adopted June 2014) confirms that GBC will consult adjoining authorities on pre-application proposals for major development likely to have an impact on their areas. In addition, authorities seeking contributions are expected to request these in writing, stating the evidence and reasoning. As such, it is considered that the existing text should be retained but that additional text should be added to clarify that this may include involvement in pre-application discussions.

	ey and "Potations" de and not	ne text in Section 4.2 Local planning policy sets out that colicies 2 and 4 allocate Top Wighay Farm for the evelopment of 1000 dwellings and 8.5 hectares of B1 and B8 employment uses." Is this correct? Policy 4 does not make reference to a specific allocation of 8.5 ha at the policy Farm or that development will be limited to 1 and B8 uses? The reference in the Policy is to Gedling 10 ha with a general reference to promoting new conomic development including Top Wighay Farm. Spendix A identifies 8.5ha of employment use (B1 B8) as part of the Strategic Site Schedules and Plans for Top ighay Farm but this is not part of the Policy or apporting justification.	Agree – Policy 4 of the ACS does not indicate a quantum of employment development nor restrict the employment use to B1 and 8. However, Paragraph 3.2.15 of the ACS refers to the IDP which is summarised in appendix B. The reasoned justification is part of the Plan. Also relevant is paragraph 3.2.16 which refers to some strategic sites having been rolled forward from previous Local Plan allocations. The 2008 brief for the site confirms that the site is suitable for B1 and B8 uses. The text will be amended (at paragraphs 2.2, 3.1 and 6.3) to clarify the reference to the ACS and to reiterate the Council's long standing ambition that the site is suitable for B1 and B8 uses, as articulated in the 2008 SPD and the emerging LPD.
Plani	rations ide Hu "A' de ref of	the paragraph set out below should be amended to entify that contributions will be to secondary schools in ucknall. At the time of writing, The anticipated impact of the evelopment on secondary schools in Hucknall is effected in the Regulation 123 list which includes the cost is secondary school contributions (estimated at 2,816,000) at the Top Wighay Farm site.	Agree – amend text to clarify that the contribution is likely to be to secondary schools in Hucknall.
and	ortunities sta	DC's concern is that the Section set out a number of atements but they are left open. There is no quirements to meets these aspects so in practice do ey have any impact?	Noted – it is considered that the development brief balances the need for certainty with the need for flexibility.

Devel	text identifies that: "A side-effect of the reduced of course, a reduced impact on I local roads, health and educathe purposes of this Developed dwelling number is not considinfrastructure requirements fo	,000 to 805 dwellings. The dwelling number is, of ocal infrastructure, including tion provision. However, for nent Brief the reduced ered to affect the rether the site sought through the	there will be a pro-rata reduction in financial contributions required for health and education as a result of the reduction in number of dwellings. Similarly, and the contributions which are based on additional corspace will also be lower as a result of the lower number of dwellings.
	The Council has concerns registal a lack of evidence to identification to infrared to the concerns and the concerns are concerns as a lack of evidence to identification to infrared to the concerns are concerns.	parding this aspect as there y the viability aspects of the	
	ADC is concerned that affordate built on site and the contribution Hucknall to other parts of Geodeleting the reference to offsit acceptable: "The developer will be responsible dwellings provided are an approximate of the developer will be responsible dwellings in line with ACS Poladistributed throughout the house concentrated in a single location of Gedling Borough Council, some may be met off-site, in the forman in-lieu payment, to meet stone Gedling Borough. The method level of off-site contribution reconstruction of Gedling Affordable Housing Stone Document.	lling. Amend the wording by e contributions being sible for ensuring 30% of propriate mix of affordable icy 8. These should be using area and not on." At the discretion of one or all of the requirement of direct provision or via rategic needs elsewhere in dology for calculating the quired is stated in the	the text proposed for deletion reflects the approach aken by the Gedling Affordable Housing Supplementary lanning Document which would remain in place. The ext has been worded to allow flexibility and a decision will be taken as to the most appropriate approach to the rovision of affordable housing at the planning application stage.

Development principles	The fact that the SPD has not been informed by the Transport Assessment leaves a number of substantial issues unresolved such as the possible requirement for a park and ride on the Top Wighay Farm site and if necessary how this would operate.	A Transport Assessment has been carried out to explore the likely mitigation measures for the site. The Brief has been updated to take into account the recommendations of the Transport Assessment
	The SPD identifies that "Infrastructure required to support the development should be designed in accordance with best practice and sustainable technology. The development of Top Wighay Farm requires that an integrated view of power generation, energy consumption, water, waste and drainage be taken from the outset. This infrastructure should be located and designed to minimise the risk posed by the impact of climate change. This includes protecting infrastructure from severe heat and storms." The Council is support of this general approach but it is not clear what this specifically means or how this can be achieved through the SPD?	It is considered that further clarification is provided by emerging policies in the Council's Local Planning Document which forms part 2 of the Local Plan.
	The SPD states that "Planning applications for the housing, business and other developments will need to be accompanied by a transport assessment and travel plan carried out in accordance with national planning practice guidance on transport evidence bases in plan making and decision taking. Developers are advised to have a comprehensive understanding of the transport modelling exercise being carried out on behalf of Nottinghamshire County Council Estates as landowner for the whole site so they can understand the wider transport implications." The Council supports this requirement but would propose that additional wording is added to take account of the potential wider highway implications either in Hucknall or within the Parishes of Linby or Papplewick in Gedling.	Agree - the existing text requires the transport assessment to accord with national guidance and to include wider transport implications, but for clarity the text will be amended to explain that this may include Hucknall, Linby and Papplewick.

Park and ride	The final SPD will need to reflect on the results from the Transport Study and whether a Park and Ride site will be require. This will also have implications for the plans attached to the SPD if a park and ride facility is required.	The case for a Park and Ride site on the site was considered as part of the Transport Assessment for the site. However, it is concluded that the level of usage would be very low and such a facility would therefore be financially unviable. A Park and Ride facility is therefore not recommended as part of the mitigation for the site.
	The Council welcomes the inclusion of 'the potential for improving north-south pedestrian and cycle links between the site and Hucknall through a designated crossing of Wighay Road should be explored'. However, it is felt much greater emphasis should be placed on achieving such a link. In order for the development to effectively link with Hucknall such routes / links are key.	New text will be added to section 6.4 (under the heading 'transport and access network') to clarify that all development will be expected to promote sustainable methods of transport such as walking, cycling and public transport, in accordance with the transport assessment for the site.
Education	The SPD should clarify that the Top Wighay Farm secondary school contributions will be necessary towards secondary school provision in Hucknall. "As set out above, the Community Infrastructure Levy Regulation 123 list includes the cost of secondary school contributions at the Top Wighay Farm site, which are required to contribute towards the cost of secondary school provision in Hucknall."	Agree – text will be added to the end of the second paragraph in section 4.4 to note that contributions are 'likely to be to existing secondary schools in Hucknall'.
	While the ALC Appendix A identifies a cost of £3.5 million, it is noted that the ACS Infrastructure Delivery Plan identifies a cost of the school of £5 - £5.5 million. Can it be clarified which figure is more appropriate?	Notts County Council (Education) has confirmed that the assumed cost has reduced from £5k to £3.5k. This change has recently come into force due to changes in the design and construction of new school buildings.

Hucknall Town Centre Regeneration	Section 2.3 identifies that the Borough Council will undertake further dialogue with Ashfield District Council to maximise the potential for the development to support and relate to relevant projects and developments in Ashfield, including Hucknall's on-going Town Centre regeneration. The Council is able and willing to identify projects which could be identified within the SPD in relation to Hucknall.	Noted. Given that the timing of future applications is unknown, it is considered appropriate for discussions to take place with ADC at the time of application in relation to scope for the development to support Hucknall town centre regeneration.
Employment	The Council supports the application of distinct character area across the site, but questions why a character area profile has not been created for the employment area? 6.3 highlights the importance of designing appropriate employment buildings that consider their surroundings, but this has not been taken forward into a character area profile.	The character of the employment area will be informed by the nature of the business which operates from the site. It is considered important that sufficient flexibility is provided to ensure that the site is attractive to a wide range of businesses.
Design	There is potential to add enhanced detail to these character areas. This would give more clarity to neighbouring communities about the design and form of development that may come forward on the site.	The brief sets out key parameters in relation to design but also allows a degree of flexibility to developers. Proposals for development will be considered in the context of the design policies contained in the ACS and the emerging Local Planning Document.
	As was suggested at the initial briefing, given the impact of the Top Wighay Farm development, would be not be beneficial to have OPUN Design: East Midlands, as the Architecture and Design Centre for the East Midlands, undertake a design review of the SPD?	Given that the brief has not been informed by a full masterplanning exercise, it is not considered appropriate to undertake a detailed design review (by OPUN or other). However, this does not rule out a review being undertaken in relation to a specific application scheme.

Local centr	While recognising that from a design aspect it may be desirable to have the local centre within the heart of the development our experience is that from a commercial perspective this has not worked. If a local centre is to provided retail outlets and public houses they key requirement is visibility and passing trade. Consequently, the location provided does not meet these objectives. In terms of accessibility for existing residents of Hucknall and Linby it would also need to be located on the outer limits of the development.	The location of the local centre was decided following careful consideration of the need for the centre to be accessible to residents, the desire for a location that would be attractive to operators and the location of the employment area.
School	The School is unlikely to purely serve the site in isolation. Its proposed location raises issues as to how accessible this is from Hucknall by foot? As designed will it minimise access to the school on foot rather than by car? When is the school required? The development is proposed to move from the south northwards. Consequently, will not be developed until the latter part of the development.	The school has been located on the boundary of the site in order to allow for the school to be expanded if additional land was allocated for development through a review of the development plan document. The timing of the delivery of the new school will depend on the timing of any planning application coming forward and the capacity in existing schools available at that time.
	Section 3.2 of the SPD identifies that "the decision to allocate the safeguarded land for future development will be considered through the preparation of a development plan document and, as part of that process, consideration will also be given to whether it is appropriate to include the land as part of the Green Belt." Therefore, potentially the site may be irrelevant to this aspect if the safeguarded land in part or whole is put back into the Green Belt.	Noted.
Key movement plan	In this context the key movement plan is effectively self contained. It does not address the links to the wider environment of Hucknall, Linby and the countryside.	Links to the wider environment will be addressed by the TA and subsequent planning applications. The key movement plan is intended to focus on movement within the site.

Design and role of SPD	Design & role of the SPD The Council would like the SPD to clarify its function in terms of next steps. Is the primary role of the SPD to present a brief for a detail masterplan exercise to effectively respond to? If this is the case, the Council believes a commitment to undertake a number of design reviews during this process should be included within the SPD. It also suggested that design codes could be developed as part of this process.	Agree – Amendments to Chapter 2 and a new Chapter 8 clarify the function of the SPD.
	The Council is concerned that the SPD does not contain sufficient design detail / requirements to effectively guide the high quality development that Gedling is seeking. There is a danger that the developer will dictate the design of scheme rather than the Council and stakeholders. However, if the previous comment and suggestion is applied this may help remedy this concern.	

	Infrastructure and viability	 The impacts from the developments at Top Wighay, North of Papplewick Lane and Bestwood Village will be focused on Hucknall. At this current time, it remains an issue as to: a) What are the broad impacts of the Top Wighay Farm and other allocated sites in Gedling around Hucknall? b) Have those impacts in relation to Hucknall been assessed? c) How will the impacts be addressed? It is understood that no viability assessments have been undertaken of Top Wighay Farm since the site was assessed as part of the ACS and Infrastructure Delivery Plan. Given that both the size of the development site has changes (40.34 ha rather than 35.6 ha) and the number of dwellings has been reduced significantly there is no evidence that the contributions identified can be achieved in terms of the viability of the site. 	The cumulative transport impacts have been considered through the preparation of the Aligned Core Strategy. A transport study was undertaken as evidence to support the proposed allocation of development in and around Hucknall. The transport study concluded that whilst the fine details of the traffic and transport impacts of each development would need to be supplied with each planning application there were no insurmountable cumulative transport issues identified. The size of the development site has changed only to reflect the grant of planning permission for the Strata Homes site (which is now not covered by the brief) and due to more accurate methods of measuring. The area of land on the ground which is being brought forward for development has not changed, only the capacity.
Nottinghamshire County Council (Property)	Introduction.	Disagree with the use of the term 'masterplan maps' which impart a precision and rigidity that is inappropriate.	Agree – remove reference to 'masterplan' from the text and the maps. However, the status of the maps and development brief as a material consideration in the determination of planning applications will remain.

Site description	Prefer the preparation of a separate 'comprehensive design concept'.	Amend - This reference at the bottom of page 8 refers to an exercise to be undertaken if the remaining safeguarded land was to come forward for development (to ensure that any new development took full account of the current allocation). The wording will be amended to clarify that this exercise will be triggered by the allocation of the remaining safeguarded land (as identified in the ACS) rather than the original area of safeguarded land (as identified in the Replacement Local Plan).
Allocated land and land use areas	Notes arithmetical discrepancies between the figures provided.	It is understood that reference is being made to discrepancies between the land area figures provided at paragraph 3.1 and in the land use table on page 18. However, these refer to an earlier version of the draft brief which were identified and corrected for the version that was the subject of the consultation exercise.
	Objection to size/location of different land uses which differ from previous planning documents.	The draft development brief reflects the land uses as agreed through the ACS so it is appropriate the land uses differ from the 2008 brief.
Local wildlife sites	The brief should acknowledge that the Top Wighay Farm Drive LWS will be affected by the construction of the access road.	The second paragraph under the heading 'road access and circulation' in section 6.4 already refers to the unavoidable impact of the access on the Local Wildlife Site and the fourth paragraph notes that the access has already been granted planning permission

Housing	Suggest that a more realistic density range is 20-35 dph.	The brief provides for a range of uses in different parts of the site (30-60 dph). This is an average density for that part of the site. However the capacity of the site has been reduced from 1000 to 805 (plus 38 dwellings on the Strata site ie totalling 843).
	Housing land is shown on land identified for employment in the Local Plan and 2008 brief.	The draft brief reflects the land uses as agreed through the ACS so it is appropriate the land uses differ from these documents.
NET	The area safeguarded for the NET should be located further north.	Amend - The wording of the brief will be amended to clarify that the area safeguarded should reflect the advice of County Highways and to refer to the County Council's technical document which sets the requirements for the internal road layout to accommodate a future NET extension.
Open space	Open space provision should not be prescribed in the brief but identified as part of the design process.	It is essential that the brief sets out requirements for open space provision to ensure that a strategic approach is taken.
Design	The chapter on design should be deleted as the level of detail is unnecessary. The landowner should have the prerogative for the design of development on its land.	It is essential that the brief addresses design and addresses quality, connectivity, form/massing, density and landscaping. The level of detail included in the brief sets broad parameters which still allows for appropriate input from the developer.

Plans	The plans are too prescriptive. All plans should be deleted and replaced by illustrations of essential planning requirements.	The plans are essential to retain in the brief to provide a framework for the determination of future planning applications.

Comments made by local residents

General	Unhappy with the principle of the development of the site.	The principle of the development of the site has already been established through the preparation of the Aligned Core Strategies.
	The location near to the M1 would really help the new age workers. Commuting to several cities offering wide job opportunities.	Noted – no change.
	Great opportunity for people to use the government help to buy schemes I think the developer would have to be registered with this scheme to help local families.	Noted – no change.
Transport	New housing needs to be supported by improvements to the road systems. Only 2 road junctions onto roads that are already congested at peak times (then into Linby or Hucknall). Improvements needed to wider road network. Provide an additional roundabout on dual carriage way for traffic going up to the motorway or the Mansfield area. Provide additional roads to alleviate traffic through Linby and Papplewick. Redevelop the Moorbridge road system.	A Transport Assessment has been carried out to explore the likely mitigation measures for the site. This has looked at the wider 'Area of Influence' and recommended improvements to a number of junctions.
	Local roads are already overloaded at peak times especially around Linby and Papplewick. Solutions need to be in place before development is completed, especially at Papplewick crossroads.	

The impact of increased traffic generated by this development on the B6011 through Linby and Papplewick has not been considered in the plan. The crossroads in Papplewick are of particular concern.	
I would like a complete travel/transport plan to be completed for the whole area, not just the immediate site, to take account of housing scheduled for North of Papplewick Lane and Bestwood Village.	The cumulative transport impacts have been considered through the preparation of the Aligned Core Strategy. A transport study was undertaken as evidence to support the proposed allocation of development in and around Hucknall. The transport study concluded that whilst the fine details of the traffic and transport impacts of each development would need to be supplied with each planning application there were no insurmountable cumulative transport issues identified. A Transport Assessment has been carried out to explore the likely mitigation measures for the site. This has looked at the wider 'Area of Influence' and recommended improvements to a number of junctions.
Pedestrian exit/access from this site is poor, the 3 exits from the Strata site onto the B6011 will not be easy to negotiate, particularly the most western one which is on a bend.	A transport assessment is being undertaken to support the TWF development site as a whole. This assessment will considers the pedestrian accessibility of the site and connectivity to adjoining infrastructure including the Strata Homes site. The developers will be required to provide safe and convenient pedestrian access to and from the site and beyond.

	The parking at the tram/station car park is already at capacity and cannot be assumed to accommodate more vehicles from this site. The original development plan for this site indicated an extension to the tram line to serve these properties is that a consideration.	The development is not predicated on the provision of a tram extension. It would be prohibitively expensive to require the TWF site to provide a tram extension at the outset. In the longer term and should additional development be allocated around the TWF site then there could be sufficient demand to make a tram extension commercially viable. In the short term bus based connections from the TWF site to the centre of Hucknall and the existing Hucknall tram/rail station are being pursued.
	The brief allows for the potential future expansion of the NET and refers to modelling work to ascertain whether there will be a park and ride as part of the development mitigation measures. Consideration should be given to these measures as a reduction in traffic in Hucknall and the local villages would be helpful.	Noted. The case for a Park and Ride site on the site was considered as part of the Transport Assessment for the site. However, it is concluded that the level of usage would be very low and such a facility would therefore be financially unviable. A Park and Ride facility is therefore not recommended as part of the mitigation for the site.
	There should be no 'rat runs' through the Strata homes site bringing traffic directly onto Wighay Road. The original brief did not provide for any access directly but the Strata site has now created this.	Agree – add a new paragraph to page 21 to read 'For the avoidance of doubt, no direct vehicular access will be permitted from the site to the B6011 Wighay Road and no through vehicular connection will be permitted between the Top Wighay Farm site and the Strata Homes development on Wighay Road, although cycling and walking connections will be encouraged.'
Flooding	Concerned that development should not create flooding problems further afield and down any streams, rivers etc around the area. Concreting over 26 acres will result in a lot of surface water. An extremely good system needs to be in place.	Section 6 of the brief includes information on flooding and drainage and requires adequate measures to be put in place to ensure that the development does not increase the risk of flooding elsewhere.
Open space	The allotment allowance is an essential part of this development and is welcomed.	Noted – no change.

Education	The development of a new school that can serve the estate and surrounds is an essential part of this development and is welcomed. Only problem is current location and high level of drivers dropping off. Having to drive in and drive out again.	The new school will serve residents of the new development. The design of the new school will need to take account of some children arriving by car.
Environment	The brief should require the retention of hedgerows and trees and to ensure that any development enhances the opportunities for nature conservation. Existing LWSs should not be further adversely affected by development.	Section 5.4 (nature conservation) already refers to the retention of hedgerows and trees within the site and to the need to conserve LWS.
	The permission already given for the Strata Homes site has seen the removal of hedgerows and trees which has a significant impact on the landscape for existing residents along Wighay Road.	Noted.
	All too often the brief refers to "seek to", "should be" and "wherever possible". The brief should be far more specific in terms of excluding removal, ensuring enhancement and preventing further loss.	Agree - The reference to Joe's Wood will be amended to remove the words 'as far as possible'. Agree - With regards to the retention of the remaining part of Wighay Road Grassland, the text will be amended to replace 'seek', with 'shall expect to retain'.

Design	Reference is made to the height of buildings to the south, stating these are "generally 2.5 – 3 storeys" which is not the case for the Wighay Road and Annesley Road areas. Higher buildings will impact negatively on existing residents in terms of visual impact and landscape.	Plan E identifies parts of the site where 3 storey buildings are more likely to be appropriate. This does not mean that there will be 3 storey buildings across the whole area.
	The brief appears contradictory in that parag 6.2 refers to the relatively low density of the Strata site (24 dph) but parag 7.4 provides for 30-40 dph adjoining the Strata site together with the potential for these to be 3 storeys.	The density of the Southern Character area reflects the proximity of the area to a soon to be developed area (rather than open countryside).
	The brief refers at paragraph 7.2 "Quality" to "an opportunity to reflect the village-scale vernacular and local distinctiveness of Linby and Papplewick". My reading of the sections on form, massing and layout and density is that the brief does not enable this.	The size of the site is such that some areas will have a more rural outlook and lower density whereas others will be of a higher density and be more urban in nature.
Infrastructure	The provision of infrastructure on the site to support the development and expansion of the safeguarded land is of concern. If there is not adequate provision within the site this will lead to an increased requirement for travel. The pressures in terms of the use of services will, again, fall on Hucknall where they are already under significant pressure.	The brief refers to the need for infrastructure to support the development of the allocated land only. The need for infrastructure to support the safeguarded land would only be considered if the site was considered for future development.