

Appendix 1

Willow Farm Development Brief

Report of Responses (January 2020)

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Introduction

1. This report summarises the key issues arising from the comments received as a result of the consultation on the Willow Farm Development Brief. Consultation on the draft development brief held between 19th August and 30th September 2019.
2. A total of 58 respondents commented on the draft development brief making approximately 250 separate comments. These included comments from the statutory consultees including the Coal Authority, County Highways Authority, Environment Agency, Highways England, Historic England, Natural England, and Severn Trent Water. The remaining respondents were local residents and the Willow Farm Action Group.
3. The vast bulk of comments from local residents and Willow Farm Action Group concerned access, traffic impacts on the local road network and highways safety. A number of respondents argued for the site to be accessed directly from the Gedling Access Road including during the construction phase. The concerns raised can be listed under the following broad headings:
 - Objections to the principle of development; loss of Green Belt and general comments;
 - Access issues
 - Traffic and highway impacts and road safety;
 - Comments relating to the GAR and its objectives;
 - Using the GAR as an access to the Willow Farm Site;
 - Accessibility and Public Transport;
 - Flood risk;
 - Supporting infrastructure especially school places;
 - Local amenity, design, layout, mass, scale and housing type;
 - Biodiversity and natural features such as the retention of hedgerows and trees and the protection of ridgelines;
 - Unstable land; and
 - Consultation including the involvement of the community.
4. For ease of reading the various comments have been summarised in the main body of this report and placed under the headings referred to above. The summarised comments in the following section avoids repetition as a number of respondents made essentially the same points. The summary is followed by the Borough Council's response to these comments.

Summary of Responses and Gedling Borough Council's Response

Objections to the principle of development, loss of Green Belt and general comments

Respondent	Ref	Representations
Local Resident	General paragraph 1.6	Whilst the brief makes it clear that the principle of development is not up for discussion, the development of Willow Farm is unwanted and unnecessary can at least be a matter of public record.
Local Resident	4.17	Section 4.17 does not mention Green's Farm Lane at all, despite being one of two roads suggested for access to the site. I presume this is an oversight and suggest it be remedied.
Local Resident	General	Disappointed about building on the Green Belt. Enquires why houses can be built on Green Belt but not an access to the GAR.
Local Resident	General	The principle of development remains flawed given the Borough Council's failure to review the Local Plan as per the documented commitment to do so if the Gedling Access Road could not be delivered by June 2020. According to the paragraph 3.18 in Policy LPD 64 of the Local Planning Document, the Borough Council have a legal requirement to conduct a full review of the Local Plan, which is currently being ignored
Local Resident	General	The review of the Local Planning Document should take into account the current political realities which are fundamentally different to when the Aligned Core Strategy target of delivering 7,250 new homes by 2028 (the respondent refers to potential changes in the level of in-migration nationally and locally as a consequences of Brexit).
Local Resident and Willow Farm Action Group	General	During the consultation into the draft Local Planning Document, Langridge Homes proposed that the Willow Farm site be extended to the line of the Gedling Access Road (GAR), thereby increasing the number of homes from 110 to 290. Access to the larger development would have been from the GAR which, they stated at the time, the Highway Authority supported. Whilst such a review and any changes to the Green Belt boundary would require examination by a Planning Inspector, the Borough Council have clearly sign-posted their future support for an expanded Willow Farm site. Given the number of homes involved and the access proposals submitted by the developer, then

Respondent	Ref	Representations
		access to this larger housing development would be from the GAR. We believe therefore that the current Willow Farm access proposal is fundamentally unsound, because the first phase of building will establish a link to Gedling Village and the second phase, once approved, will then establish a link from the development to the GAR.
Willow Farm Action Group	1.1	Feedback at the June 2019 meeting that the (earlier) draft of the development brief lacked a clear set of aims has been addressed at paragraph 1.1 is a welcome improvement.
Willow Farm Action Group	5.1	Support the two key objectives and the four development principles.
Willow Farm Action Group	3.3 – 3.14	The national and local policy guidance are detailed and well set out and include a number of policies and guidelines that are of great importance to local residents.
Willow Farm Action Group	6.2	Understand a review of the Aligned Core Strategy is underway and given the uncertain timescales for delivery it would be appropriate to include this fact within the brief. There must remain a possibility that the revised Aligned Core Strategy will be adopted before the Willow Farm site is developed.
Willow Farm Action Group	7.2	The Local Planning Document states that Policy LPD 64 prevents the development of the site prior to completion of the Gedling Access Road and this statement was also the basis of the information put forward before the Planning Inspector. Concerned that the Borough Council has changed its position.

Gedling Borough Council Response

- In relation to the necessity of the housing development, the housing target of 7,250 new homes up to 2028 was tested at the examination into the Aligned Core Strategy (Part 1 Local Plan). At this examination the Inspector heard arguments for more or less housing but agreed with the Greater Nottingham Councils that the housing target was objectively assessed and justified to meet local need. The Inspector accepted that not all housing development needs could be accommodated within the existing urban area thereby necessitating the removal of sites on the edge of the urban area and at Key Settlements from the Green Belt; and that the very special circumstances required to justify the removal of sites from Green Belt had been demonstrated.

6. The principle of development on the Willow Farm site has already been established through the adoption of the Local Planning Document (Part 2 Local Plan). The Inspector accepted that were very special circumstances justifying the site to be removed from the Green Belt to meet housing needs in the area.
7. The site was removed from the Green Belt at the time of the adoption of the Local Planning Document. The land which would be required for an access road to the Gedling Access Road (GAR) is located within the Green Belt and would require very special circumstances which, in the Borough Council's view, cannot be demonstrated (a fuller explanation of the Borough Council's position is set out in paragraphs 25 – 27 below).
8. Paragraph 3.18 in Policy LPD 64 of the Local Planning Document does refer to the need for an early review of the Local Plan, with the trigger point for consideration of an early review being conditional on confirmation from the promoters of the GAR that the scheme is not to be delivered by spring 2020.
9. The Local Planning Document was adopted at a time when there was more uncertainty about the delivery and timing of the GAR project. However the need for a review has already been considered and at its meeting on 10th January 2019 Cabinet members were appraised as to the progress of the delivery of the GAR and referred to paragraph 3.18 of Policy LPD 64. It was determined that the delay in progress of the GAR was not so significant so as to require an immediate review of the Local Plan, but in any event, the same report noted the commencement of the review of both the Aligned Core Strategy, to be followed by a review of the Local Planning Document.
10. It is not felt necessary to refer to the review of the Aligned Core Strategy in the development brief given that the purpose of the brief is intended to provide more policy detail to the H3 Willow Farm allocation and the principle of development on this site has been accepted.
11. In relation to the point about the objectivity of the housing numbers and changing circumstances it is accepted that there is considerable uncertainty about the future impact of Brexit and consequential implications for in-migration from EU countries and conversely the out-migration of UK citizens to EU countries. The Government sets out how housing numbers should be derived and provides estimates of the number of new households likely to be formed in the Borough Council's area. This is adjusted to take account of local affordability ratios. The latest figures for Gedling Borough Council is that

the current annual requirement would need to increase from 426 to 443 new homes per annum although this would need to be tested through the review of the Aligned Core Strategy. By way of background the Government is committed to achieving a national housing target of 300,000 new homes per annum to meet need including a backlog as housing completions nationally and locally have consistently underperformed against targets. The amount and distribution of housing across Gedling Borough will be addressed through the review of the Aligned Core Strategy.

12. The redefining of Green Belt boundaries to meet future local housing need is a matter for the review of the Aligned Core Strategy and the Local Planning Document. Decisions on the allocation of further sites such as extending the Willow Farm H3 allocation has not been made as this can only be undertaken through the Local Plan review process which will be subject to public consultation. The potential creation of a rat run from the GAR through to Arnold Lane is a concern that the Borough Council seeks to avoid and one of the reasons why it is not supportive of the site being accessed from the GAR.
13. It is agreed that a reference to the residential character of Green's Farm Lane should be included within the development brief.

Changes to the Development Brief

Amend development brief at paragraph 4.17 to refer to the residential character of Green's Farm Lane.

Access Issues

Traffic and highway impacts and road safety

Respondent	Ref	Representations
County Highways Authority	General	No transport planning observations to make except that we are satisfied with the documentation as it states that a Transport Assessment will be required to look at the highway network and highway safety implications of the development.
Highways England	General	Considering the scale of development and layout of the local highway network in the area, we would not expect that distribution of traffic generated from the

Respondent	Ref	Representations
		<p>site onto the highway network, would result in any significant impact on the Strategic Road Network¹. However, moving forward, the development proposal would need to be supported through the completion of a Transport Assessment.</p>
Local Residents	General, paragraphs 4.20 – 4.24, paragraphs 5.5 – 5.7.	<p>Many respondents objected to the access arrangements being from the two local roads Green’s Farm Lane and Grange View Road and their concerns are summarised below:</p> <ul style="list-style-type: none"> • The cul de sacs are steep and with parked cars are difficult for lorries to navigate. The use of these for construction vehicles will lead to noise and pollution; • Very busy cul de sac with the top of the street used as a turning point mostly due to the steep incline; • The two roads are not suitable Jessops Lane and Yew Tree Lane; • Concerned about access through the cul de sacs. They are full of parked cars (which is awkward enough as it is) narrow roads and low railway bridges. It’s already a rat run as it is; • Safety issues at the junction of Jessops Lane and Willow Lane; • Safety issues around Willow Farm Primary School and parking close to the school; • Lambley Lane junction which shows an increase in traffic since 2017 of 21% in evening peak hour traffic. Investigate at an early stage what mitigation measures can be implemented at the Willow Lane/Yew Tree Lane junction/railway bridge and the Jessops Lane/Willow Lane junction/railway bridge; • Willow Lane has a blind corner on entering the bridge. Drivers often cross the centre line and large vehicles have to cross the centre to access the highest part of the bridge; • Flooding under the bridge; and • More traffic congestion <p>Respondents also made the following comments in summary about the need for an assessment of traffic impacts:</p>

¹ The Strategic Road Network (SRN) is managed by Highways England and includes the motorways and some Class A roads.

Respondent	Ref	Representations
		<ul style="list-style-type: none"> • should adhere to the Nottinghamshire 6Cs design guide and it would appear that the Borough Council is ignoring these including: <ul style="list-style-type: none"> ○ Traffic impacts; ○ Measures influencing travel behaviour ○ Reducing the need to travel; ○ Tackling environmental impact; and ○ Accessibility of the location • Would be interested to know what plans are put in place to manage increased traffic at local junctions and on main routes. • Nowhere in the brief is the mention of how the increased level of traffic produced can exit the area once it leaves Grange View Road or Green's Farm Lane. • The Local Plan utterly failed to acknowledge the attendant impact on local traffic by accessing this site using existing roads, and the development brief has done the same. The recent survey results comparing traffic from March 2017 to March 2019 on Jessops Lane, which connects to Willow Lane in providing access to the two proposed access roads, show a 10% increase during that period.
Local Resident	General	Housing is much needed within the area. Access to the Gedling Access Road should not be allowed as this would cause other users to go through the development to access the Gedling Access Road.
Local Resident	General	Construction traffic cannot be allowed to use the Green's Farm Lane and Grange View Road. How is the noise and mess going to be adequately managed? How is increased traffic and transition to main roads from the 120 dwellings going to be managed safely? Will there be a resident scheme similar to the congestion charge but in reverse for local residents.
Local Resident	General	Will there be restrictions on construction traffic?
Local Resident	Figure 3	Figure 3 shows a secondary route connecting the residential areas which is contradictory.
Local Resident	5.8	Why the development cannot be accessed from the Gedling Access Road. Concerned that the 110 homes will have a detrimental effect on these already congested roads. Refers to issues of congestion and parking
Willow Farm Action Group	5.5	Note and support the need for a Transport Assessment and Travel Plan. Consider this should include an evidence based assessment of the estimated volume of traffic that the new development

Respondent	Ref	Representations
		will generate and careful consideration of the effectiveness of the local network to disperse this additional traffic.
Willow Farm Action Group	5.8	Request that Langridge Homes consider revising the site plans to design a more evenly balanced distribution of vehicle movements between the two existing roads.

Gedling Borough Council's response

14. Representations made by Nottinghamshire County Council as local highway authority at the Local Planning Document examination were in support of the proposed access points from Green's Farm Lane and Grange View Road. The aim is to integrate the development with the existing community which would encourage the use of non-car modes of transport including bus services, cycling and walking. A connection through to the Gedling Access Road would be less sustainable as it may encourage more use of the private car from the development site and lead to the possibility of establishing a "rat run" from the Gedling Access Road to Arnold Lane.
15. In terms of acknowledging the traffic impact of the development. The County Highways Authority and the independent planning inspector who examined the Local Planning Document were satisfied that the site could be satisfactorily accessed. The development brief is intended to supplement the policies in the Local Planning Document and it is clearly stated that a transport assessment and travel plan would be required. The County Highways Authority and Highways England have indicated their support for the reference to the requirement for a transport assessment and travel plan as stipulated in the Brief and therefore it is considered that the Willow Farm Development Brief provides sufficient guidance on this matter.
16. With respect to concerns over the impact of traffic from the development and need to take into account the 6Cs Guide (now called the Nottinghamshire Highways Design Guide), a Transport Assessment will be required as part of the planning application process to look at the highway network and highway safety implications of the development. This assessment will need to meet the guidelines for assessing traffic impacts as set out in the Nottinghamshire Highways Design Guide.
17. A number of concerns were raised about construction vehicles using Arnold Lane, the management of construction vehicles more generally and whether

restrictions would be imposed. It is confirmed that a Construction and Environmental Management Plan would need to be submitted and approved (see also paragraph 28 of this report below). This would include, amongst other things, the routing for construction vehicles; site access arrangements; measures covering the loading and unloading of materials and plant; the provision of wheel cleaning facilities; and controls over working hours. Nottinghamshire County Council as Highways Authority intends to introduce an Environmental Weight Restriction on Arnold Lane as a complementary measure to encourage heavier vehicles to use the Gedling Access Road route once it is open to traffic. However, Nottinghamshire County Council's policy exempts those heavy vehicles requiring local access for deliveries such as construction vehicles. This would be for a temporary period during the construction phase on site.

18. The reference to applying a congestion charge in reverse in this locality is not considered necessary or appropriate. As stated elsewhere a Transport Assessment and Travel Plan are required to address traffic impacts and safety issues and to influence travel behaviour. Developer contributions would be sought towards the costs of any traffic mitigation measures identified in the Transport Assessment.

19. A respondent referred to the 6C's Guide (now called the Nottinghamshire Highways Design Guide) and the need for measures to influence travel behaviour. A travel plan is required as part of any planning application for the site and would be expected to include measures influencing travel behaviour such as encouraging the use of walking, cycling and public transport.

20. The Willow Farm Action Group requested that the developer consider revising the site plans to achieve a more balanced distribution of vehicle movements. The detailed design and layout is a matter for the detailed planning application stage.

Changes to the Development Brief

Correct references to the 6 C's Design Guide throughout the document as it is now called the Nottinghamshire Highways Design Guide.

Comments relating to the Gedling Access Road (GAR) and its objectives

Respondent	Ref	Representations
Local Resident	2.4 and 7.2	There seems to be a great deal of conflicting information about the exact circumstances in which the development of Willow Farm may commence (paragraphs 2.4 and 7.2 of the Development Brief).

Respondent	Ref	Representations
Local Resident	4.21	Completion date for the GAR could slip. It would be sensible to impose a condition limiting the number of houses to be built on the Willow Farm site before the GAR is completed to prevent the capacity of the A6211 being breached.
Local Resident	4.21	Understand that the delivery of the site was dependent upon the GAR construction. Why has this changed?
Willow Farm Action Group	2.4 and 3.10	Note at paragraph 2.4 that the ability to develop the Willow Farm site is dependent on the commencement and opening of the Gedling Access Road (GAR). The statement in paragraph 3.10 appears to be in conflict with LPD 64 and paragraph 2.4.
Willow Farm Action Group	4.21	This statement is misleading as upon completion of the GAR the new road will become the A6211 and Arnold Lane would be declassified and will not be a primary road.
Willow Farm Action Group and Local Residents	Paragraphs 7.6 – 7.9	<p>The developments at Willow Farm and Chase Farm would result in the undermining of one of the key objectives of the GAR and remain opposed to the use of the existing road network to access the development.</p> <ul style="list-style-type: none"> • Primary purpose of the GAR is to unlock land on the edge of Gedling village – Willow Farm falls within this category. • The secondary objective is to provide a bypass to the east of Gedling village with a view to reducing the amount of traffic currently utilising the A6211 Arnold Lane. • Accept site can be technically accessed from existing roads although there is a compelling case for not doing so. • The plan put forward by the Borough Council is that the GAR will reduce traffic levels on Main Road. However it appears highly likely that the secondary purpose of the GAR will be compromised by the significant increase in traffic that will be generated on Arnold Lane since the plan was formulated and by the increase in traffic from the Willow Farm and Chase Farm developments. • The planning application for the GAR states that the GAR was expected to reduce the daily level of traffic on Arnold Lane by a third (4,000 vehicles). This provides a base level of 12,000 vehicles per day. • The Gedling Colliery/Chase Farm planning application highway modelling work

Respondent	Ref	Representations
		<p>determined that 315 dwellings could be accommodated on the existing road network. This confirms that during the early planning stages it was recognised that Arnold Lane was already approaching or at full capacity.</p> <ul style="list-style-type: none"> • GAR website confirms the A6211 has been subject to increasing amount of traffic and one of the most heavily used roads in the region carrying over 15,000 vehicles a day. • GAR is expected to reduce the level of traffic from 15,239 to 10,000 which is 2000 more vehicles than the 2014 estimate of the levels which would remain on these roads. Current plans are therefore highly likely to return the volume of traffic on Arnold Lane to the current levels fundamentally undermines one of the primary purposes of the road. <p>The single access point for Willow Farm should be the GAR and preserving the strategic road objectives set for the GAR would meet the requirement to demonstrate that very special circumstances can be reasonably advanced.</p>

Gedling Borough Council's Response

21. The primary purpose of the Gedling Access Road (GAR) is to provide access to the development site at Gedling Colliery/Chase Farm housing and employment sites. Once the road is opened it will serve the development sites and provide a better route for the current levels of through traffic using Arnold Lane.

22. Traffic impact is normally assessed using a model which compares different scenarios i.e. with or without the road improvement using consistent data for the base year and forecasting period. The traffic modelling submitted as part of the planning application for the GAR included a reference case which took into account assumed local traffic growth and planned development over the plan period without the GAR being in place. This was compared to a scenario which included the GAR opening, the so called design scenario. This modelling shows substantial reductions in traffic between the reference case and design flows along the A6211 corridor and the operation of existing junctions would be improved.

23. In relation to the points about whether the site should be dependent upon the GAR construction; and potential slippage in the programme for construction of the GAR, it is noted that good progress is being made with the main building works due to commence on the 6th January 2020 and expectation the new road would be open in 2021. Assuming the project remains on track, it is unlikely to be necessary or reasonable to prevent the development of the site until the GAR is open. A detailed planning application has yet to be submitted for the Willow Farm site; and the situation with the implementation of the GAR may be reviewed at that time. Development of the site cannot commence until planning permission is granted and as such, the number of houses that could be completed and occupied prior to the completion of the GAR is likely to be very few, even if a planning application was submitted imminently.
24. The reference in paragraph 2.4 that the ability of this site is dependent on the commencement and opening of the GAR is an error and the correct reference is that the development should be dependent on the commencement of the GAR throughout the document. This will also require clarification by way of a footnote to paragraph 3.10 which quotes LPD Policy 64 and will set out the changed circumstances since the adoption of the LPD. It is accepted that the Arnold Lane/Main Road would be declassified on the opening of the GAR and the development brief will be amended accordingly.

Changes to the Development Brief

Amend paragraph 2.4 to state that the ability to develop the site is dependent on the commencement of the GAR.

Include a footnote in paragraph 3.10 to the effect that - since the adoption of the LPD, the GAR project is making good progress with the main building works due to commence in January 2020 and expectation that the new road would be open in 2021. Assuming the project remains on track it is unlikely to be necessary or reasonable to prevent the development of the site until the GAR is open.

Include a footnote in paragraph 4.22 to the effect that - on opening of the Gedling Access Road the A6211 would be declassified from its primary status as the GAR would be classified as the new primary route – A6211.

Using the Gedling Access Road (GAR) as an access to the Willow Farm Site

Respondent	Ref	Representations
Local Resident	General	In the earlier stages of discussion about access to the site the Borough Council openly gave the impression that access from the GAR would be considered and be perfectly possible. Then goal posts were blatantly moved on that decision firstly by changing the date that the houses could be commenced to be built to the time the GAR was commenced and then by announcing that a slither of "Greenbelt land" was in between the GAR and the site existed to prevent such access.
Local Resident	General	The option of an access from the GAR which has been explored by the Highways Authority needs a further independent opinion. There is only access for construction traffic under the bridge on Willow Lane as Jessop's Lane is too low. Would wish to see a whole section addressing construction traffic.
Local Resident	General	Strongly oppose the access to the development via the use of the existing road network, namely Grange View Road and Green's Farm Lane. Using the GAR to access the Willow Farm is a considerably better idea and something which I believe has not been opposed by the Highways Authority.
Local Resident	General	Believe that any harm to the green belt, caused by a small connecting road between the GAR and Willow Farm, can in fact be justified, because it is outweighed by other significant considerations, namely that the proposed access route cannot safely and effectively manage the additional burden placed on it
Local Resident	General	Suggestion that a route should be made from the GAR, north of the development. We would like to point out that these fields are valuable agricultural land and farmed for over 100 years. Green's Farm Lane is the only access road to the fields owned by Langridge Homes.
Local Resident	General	The option of an access from the GAR which has been explored by the Highways Authority needs a further independent opinion.
Local Resident	General	The construction period will last three years and make construction traffic use Arnold Lane at the same time the County intend to place weight restrictions on HGVs. It is more sensible to use the GAR.
Willow Farm Action Group	General	The single access point for Willow Farm should be the GAR. The technical viability of utilising the GAR to provide access to Willow Farm has not been opposed by the Highways Authority although it would require a new junction.

Gedling Borough Council's response

25. Representations made by Nottinghamshire County Council as local highway authority at the Local Planning Document examination were in support of the proposed access points from Green's Farm Lane and Grange View Road. In response to the suggestion by WFAG that there should be an access from the Gedling Access Road (GAR) for construction traffic, the local highway authority indicated that this option could be considered further. This option has now been explored with the County Highways Authority. Whilst in some circumstances temporary accesses solely to be used for construction traffic can be provided via a track, in this case it has been concluded that a track would not be acceptable and the topography is such that a temporary access would have to be built to the normal standards for a permanent access road and would require a new dedicated junction with the GAR. This would constitute a 'substantial engineering operation' in planning terms which is not covered by permitted development rights such, that a planning application would need to be submitted.
26. In determining a planning application for a new link road, it is important to note that the land situated between the northern boundary of the Willow Farm housing allocation and the proposed Gedling Access Road between Lambley Lane and the A612 is within the Green Belt. As a respondent notes above, the land in question is also currently part of a farm business. The construction of a new access road in this location would require "very special circumstances" to comply with the National Planning Policy Framework and the Local Planning Document. Given the proposal is not necessary to meet the highway requirements of the allocated site (which are clearly set out in the Local Planning Document and have been agreed with the County Council as highway authority) "very special circumstances" cannot reasonably be advanced. The County Highways Authority is the body leading on the delivery of the GAR and there is no need for a second opinion.
27. Regarding the principle of a link road to the GAR, if the site was to be solely accessed from the GAR this would effectively segregate the proposed development from Gedling village. This would not be acceptable from the spatial planning perspective which seeks to integrate new development with existing communities. In this context, the principle of a link road to the GAR would not be an alternative to the existing access arrangements but in addition, and would give rise to the risk of providing a "rat run" through to Arnold Lane.

28. Respondents referred to potential impacts from construction traffic with a specific point about including a section on construction traffic in the brief. In this context, a Construction and Environmental Management Plan would be put in place as part of any detailed planning permission which would include measures to reduce the impact of the construction phase and associated construction traffic. The development brief is to be amended to include a section on the Construction and Environmental Management Plan. (The point about Environmental Weight Limits being implemented on Arnold Lane on the opening of the GAR is covered in paragraph 17 above).

Changes to the Development Brief

Insert new section after paragraph 5.16 setting out the need to submit a Construction and Environmental Management Plan (CEMP) and guidance on its likely content.

Accessibility and Public Transport

Respondent	Ref	Representations
Local Resident and Willow Farm Action Group	4.21	The Site Allocation in Carlton 2016 document states that there will be a need to ensure that there is connectivity to existing bus services for Willow Farm. This statement does not appear in the Brief and we remain unclear as to how this will be achieved?
Local Resident	4.21	There should be a bus service within 400m of any development according to North East Arnold Development Brief. At the moment it will be 700m to a 2 hourly service. How will this be resolved?
Local Resident	5.9	Site is only served by the L74 which runs only 4 times daily. Red 44 is unreliable. Majority of residents to opt to use private transport. These comments should be removed from brief
Local Resident	5.9	Should encourage the use of bus services. Increased use of the L74 might allow an increased frequency of service and consider requiring developer to make a financial contribution.
Willow Farm Action Group	4.21	The North East Arnold Development Brief at paragraph 5.24 identifies a key test for the sites is to ensure that all new residential areas lie within 400m of bus stops. This is clearly not the case for the Willow Farm Site and we remain unsure how the Borough Council intend to deal with this policy / guidance requirement?

Gedling Borough Council's Response

29. Paragraph 5.9 and 5.10 of the Willow Farm Development Brief refers to the need for the development site to have good connections and comprehensive network of good quality footpaths that connect to existing residential areas and bus stops. This matter would be considered in the Transport Assessment.
30. The reference to “to ensure that there is connectivity to existing bus services for site H3” is a recommendation contained within the Sustainability Appraisal Publication Draft Appendix H² which was produced at the same time as the publication draft of the Local Planning Document as part of the evidence base. The Inspector who held the examination on the Local Planning Document accepted the site was in a sustainable location and the principle of development has been established on this site and the matter dealt with, so no changes are necessary. The Willow Farm site is within 400 m of the 2 hourly L74 service on Jessops Lane.
31. The Transport Assessment and Travel Plan will need to consider whether mitigation in the form of improvements to public transport are required and may potentially seek to improve public transport provision. The need for any improvements to public transport will be considered through the planning application process. The NCT Redline 44 provides a frequent service, however, its reliability is a matter for the operator.

Flood Risk

Respondent	Ref	Representations
Environment Agency	General	The site is within Flood Zone 1. No concerns with the proposed development.
Local Resident	Paragraph 4.1	Concerned about the risk of flooding, as I live on the very edge of the development with a steep gradient. I would need 100% reassurance that this would not impact my property in a negative way.
Local Resident	Paragraph 4.2	Surface water runoff will potentially effect areas lower down. Areas already prone to flood risk under the rail way bridge and Jessop's Lane. Ensure adequate drainage is installed to ensure surface water is routed away from Jessop's Lane and Willow Lane.
Local Resident	Paragraph 4.2	Residents on Oak Tree Lane suffer regular flooding issues from the H3 site. The Willow Farm

² Available as document reference LPD/REG/19

<https://www.gedling.gov.uk/lpdexamination/examinationlibrary/index.html#LocalPlanningDocument>

Respondent	Ref	Representations
		development is being built on fields which absorb rain water and there are a large number of homes below the site some of which already experience problems with flooding.
Local Resident	4.2 – 4.4	Paragraphs 4.2 – 4.4 it should be a requirement that run off rates should be bettered not just adhered to. Not clear if existing sewers are to be used and potentially overloaded.
Local Resident	4.2 – 4.4.	Another problem is the flooding risk that homes adjacent to the development already suffer! It is not good enough that the risk should not be made worse. The risk to these homes should be eliminated, not allowed to continue as it is at present.
Local Resident	4.2, 4.3 4.4 and 5.1	Flooding is a major concern. Willow Lane already floods regularly. Regularly floods on Jessop's Lane close to the bridge.
Local Resident and Willow Farm Action Group	Paragraph 5.15	Paragraph 5.15 recognises that the steep gradient of the site risks surface water run-off and will therefore require a robust flood risk appraisal, on the basis that the objective must be to ensure that the Willow Farm development does not elevate the current levels of risk.
Local Resident	Paragraph 5.15	Concreting over the greenfield Willow Farm site can only make this situation worse as natural opportunities for rainwater to soak away are lost. The brief talks of a “robust flood risk appraisal” being required as part of the preparations to develop the site. Residents need to have that clearly defined, and to feel reassured that if such an appraisal finds that the risk of flooding of the local area arising from the development of the site is deemed to be unacceptable,
Local Resident	General	The new estate is going to produce a great deal of water dispersal problems via the drainage from a huge area of paving road surface and house footprint
Willow Farm Action Group	4.1	Flood risk remains an area of concern for local residents and support the need for a robust flood risk appraisal and assume that this will take account of the Planning Inspector's main modification 5 for the LPD.
Severn Trent	General and paragraphs 4.4 – 4.5	In principle Severn Trent have no objection to the proposals within the development brief for Willow Farm. Support the principle of paragraphs such that the proposed development will need to incorporate SuDS and identify a suitable outfall for surface water through infiltration or watercourse where possible. From a high level review of the ST network there are surface water sewers in the vicinity of the site so no surface water should be connected to the Foul Sewers.

Respondent	Ref	Representations
Severn Trent	General and paragraphs 4.4 – 4.5	Paragraph 4.4 however states that SuDS measures are adopted by the Statutory Sewerage Undertaker. Water utilities companies are only allowed to adopt features that meet the definition of a sewer. SuDS do not currently meet the definition of a sewer and we are therefore unable to adopt SuDS. The developers will need to ensure that the SuDS are developed and maintained in perpetuity either by an alternative body or management company where not adoptable by the Water Utility Company Sewers.

Gedling Borough Council's Response

32. The Environment Agency note that the site is within Flood Risk Zone 1 (low risk flood area) for fluvial or flooding from a nearby water course. However, local residents raised concerns about surface water flood risks.
33. Paragraph 5.15 of the Willow Farm Development Brief refers to the gradient of the site and need for Sustainable Urban Drainage Systems³. The brief requires a flood risk assessment to be prepared by a suitably qualified person which will need to focus on surface water flood risk.
34. In relation to the comment made by the Willow Farm Action Group, Policy LPD 4 of the Local Planning Document is in place and includes the modifications recommended by the Inspector who held the examination into this plan. These modifications are included in Part c) of the Policy which states:
- c) Developers will be required to show that the proposed development would:
1. not increase the vulnerability of the site, or wider catchment, to flooding from surface water run-off from existing or predicted water flows; and
 2. wherever practical, minimise the risk of surface water flooding in the wider area.
35. The developers can only be required to mitigate the impacts of the proposed development and cannot be required to address pre-existing condition. However, the objective of Policy LPD 4 is to manage the risk associated with surface water flooding potentially arising from the development to acceptable levels. The Sustainable Urban Drainage Systems will need to be designed so as to ensure the current rates of surface water runoff are limited to greenfield

³ Sustainable Urban Drainage Systems are a way of managing storm water locally, close to source to follow natural processes, encourage infiltration, attenuation and passive treatment

rates or in other words the development should not increase the risk of flooding by surface water on the site or elsewhere.

36. Severn Trent Water's comments are noted and suitable amendments will be made to paragraph 4.4 of the Willow Farm Development Brief.

Changes to the Development Brief

Amend paragraph 4.4 to - SuDS measures should be maintained in perpetuity through suitable management arrangements unless they form part of the highway network's drainage system

Supporting Infrastructure

Respondent	Ref	Representations
Local Resident	General	Were Willow Farm Primary School made aware of the proposed construction leading to increase in primary school children? What can Willow Farm school do to overcome the problem
Local Resident	3.15	It is all very well to oblige developers to contribute to infrastructure, but the timing of the creation of that infrastructure is of paramount importance. Additional capacity must be delivered in accordance with the requirements of Policy 18 of the Aligned Core Strategy.
Local Resident	3.15	Local schools are already oversubscribed.
Local Resident	5.4	Strongly oppose the plans. The schools in the area are already some of the most difficult to get into in the Borough and adding another 100 children into the equation is going to make things worse
Local Resident	4.2 – 4.4	Not clear if existing sewers are to be used and potentially overloaded.
Local Resident	4.19	Paragraph 4.19 surprised that Lambley Recreation Ground is not listed.
Severn Trent as owner of the foul water sewage system	General	In principle Severn Trent have no objection to the proposals within the development brief for Willow Farm.
Sports England	General	Sports England also consider that new developments should contribute towards meeting the demand that they generate for onsite and offsite sports facilities.

Respondent	Ref	Representations
Willow Farm Action Group	General	We remain concerned that the necessary infrastructure is not in place to support the scale of development within Gedling, particularly in the areas of health and education, and we are not reassured that the plans are in place to ensure the additional capacity necessary will be available, at the right time.

Gedling Borough Council's Response

37. The Local Planning Document specifies that developer contributions would be required towards affordable housing, education and health. This is also set out in the Willow Farm Development Brief which provides a policy hook for securing financial contributions towards the services required to support the development in a legally binding document.
38. The Local Education Authority have responsibility for ensuring that there are sufficient school places made available. The Local Education Authority has been involved in the preparation of this development brief and their expectation is that measures would be put in place to provide additional school places through Section 106 planning agreements. The Willow Farm Development Brief states that developer contributions towards educational school places would be required.
39. Based on the standard formula used by the Local Education Authority in general, 100 houses would be likely to generate 21 primary school places and 16 secondary school places over a period of time. Financial contributions towards education are based on this multiple and details are set out in the Nottinghamshire County Council Developer Obligations Strategy⁴. Developer contributions will be set out in legal agreements, called S106 Planning Agreements, which will also include details of when contributions will need to be paid usually expressed as triggers points (for example on completion of a certain number of dwellings).
40. Considerable investment in additional school places is planned in the area. A new primary school is to be built on Teal Close, Netherfield with a capacity of 210 places and designed with the capability to expand to a 315 place school. A new primary school is also to be constructed on the nearby Gedling Colliery/Chase Farm site with the developer contributing £3.6 m and a 1.2 ha

⁴ <https://www.nottinghamshire.gov.uk/planning-and-environment/general-planning/planning-obligations-strategy>

site. The legal agreements include a number of trigger points for the financial contributions to be paid and for the transfer of a serviced site on the occupation of a stated number of homes. This enables the primary schools to be developed in tandem with the housing development to meet the likely needs arising gradually from the occupation of homes. Planning permission has been granted (reference 2019/0528) for a new teaching block at the Carlton Academy which will increase the school capacity from 900 to 1,200 students. As stated elsewhere, developer contributions will be sought for the additional primary and secondary places needed to support this development.

41. Severn Trent Water, the owner of the sewerage system, has responded to this consultation and has raised no objections in principle. The company has a legal obligation to connect new development to the sewerage system and the company will undertake to carry out any improvements if necessary once the exact details of the development are certain.
42. It is agreed that Lambley Recreation Ground is an important local recreational facility. It is designated as protected open space in the Local Planning Document and should be referred to in paragraph 4.19 of the Willow Farm Development Brief.

Changes to the Development Brief

Amend paragraph 4.19 to include Lambley Recreation Ground in the list of key local facilities.

Local amenity, design, layout, mass, scale and housing type

Respondent	Ref	Representations
Local resident	3.10	Langridge Homes who own the Willow Farm site, that their assertion that the site should not support the development of 110 homes because this would significantly reduce the quality of the individual dwellings, the quality of the development overall, and the amenity of existing local residents, should be taken very seriously.
Local resident	4.8	With such a steep gradient there will be many problems. Being over shadowed, overlooked, and also building work that could effect our property structurally.
Local resident	4.8	Will significantly block views, sunlight and impact the privacy of all of the houses below the development, adjacent on Almond Walk which are bungalows built in the 1970s. The section needs to explicitly limit the height of any proposed development and ensure that

Respondent	Ref	Representations
		considerations of privacy to the houses below the steep gradient are taken into account.
Local Resident	5.1	Reference to approximately 110 homes being built is too vague and a precise upper limit should be stated.
Local Resident		Consideration should also be given to reducing the maximum number of houses to below the 110 figure.
Local Resident	4.18	Section 4.18 reflects the low-density nature of the surrounding accommodation, and section 6.7 underscores that the site must be developed in keeping with its environs, specifically referring to “scale, height and massing”. This however conflicts with the stated intention (in sections 1.1, 3.10 and 5.1) to put 110 homes on the Willow Farm site.
Local Resident	5.2	Specify the number of two/three/four bed houses consider having a high percentage of 2 bed houses.
Local Resident	General	Suggest there are only low level housing on this hillside, and not 3 storey properties.
Local Resident	General	Greater emphasis should be placed on the alignment, height and position of new properties such that loss of amenity is considerably reduced. Restrict number of properties built to a lower density.
Sport England	General	Sport England in conjunction with Health England has produced Active Design which sets out 10 key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity.
Willow Farm Action Group	4.8	The brief recognises the challenge posed by the steep gradient of the land towards existing homes, which is a matter of great concern for local residents, particularly those who live immediately adjacent the site.
Willow Farm Action Group	5.16	Support assertion that the amenity of both existing and future residents is an important issue. Assessment of the impact on amenity should be evidence based and fully comply with Policy 32 of the Local Planning Document and its associated guidance which includes: the extent to which the vehicle movements generated by the proposed development above those present in the area will create noise, pollution and change the character of the area.
Willow Farm Action Group	5.16	Note and support the requirement for a Construction Environmental Management Plan.
Willow Farm Action Group	6.2	Support Key Development Principles.
Willow Farm Action Group	6.9	Paragraph 6.9 outlines the need to ensure the street network within the development is designed to manage vehicular movement in a way that provides safe access and prevents through traffic. Residents remain concerned that these principles should also apply to the

Respondent	Ref	Representations
		surrounding street network both during the construction and post construction phases to ensure the road network is also capable of efficiently and safely dispersing the additional traffic.
Willow Farm Action Group	6.17	Reference to adapting the size of window openings to maximise solar gain. There are also other areas of policy which should be taken into account for e.g. impact of windows on the privacy of existing residents.

Gedling Borough Council's Response

43. Policies in the Local Planning Document are in place, namely Policy LPD 32 (Amenity) and Policy LPD 35 (Safe, Accessible and Inclusive Development) which will address the impact of development on local amenity and seek to ensure that potential impacts are acceptable. In relation to comments concerning layout, the height of buildings, design including window openings are matters to be considered through the planning application process when local residents will have further opportunity to comment.
44. The figure of 110 homes is established in Policy LPD 64 of the Local Planning Document. However, the actual capacity or number of homes on site will be determined through the planning application process when the details of the design and layout are known.
45. Specifying the number of two/three or four bedroomed houses is too detailed a matter for the Willow Farm Development Brief to address and will be determined through the planning application process. Policy 8 of the Aligned Core Strategy and Policy 37 of the Local Planning Document which set out policy on housing size, types and tenures are in place to guide the planning application.
46. Policy LPD 32 of the Local Planning Document will be used to assess the forthcoming planning applications factors to be considered include over bearing and overshadowing and more detailed guidance on how these factors should be assessed are set out in paragraph 10.2.3 of the Local Planning Document.
47. The planning application would need to be supported by a Transport Assessment and travel plan that will consider traffic impacts and safety issues on the local road network and need for mitigation measures.

Biodiversity and natural features such as the retention of hedgerows and trees protection of ridgelines

Respondent	Ref	Representations
Local Resident	4.11 – 4.14	The development brief should be stronger in regard of existing hedgerows, so I recommend the replacement of these words with those such as “obligation” and “must” making it a clear requirement rather than a “nice to have” that developers are at liberty to overlook.
Local Resident	4.11 – 4.15	Hedgerows are mature landscape, important for wildlife and should be retained.
Local resident	General	More green space should be incorporated. Greater emphasis should be placed on the protection of the natural habitat.
Local Resident	6.16	We strongly support the planting of additional trees and the retention of hedgerows. Many of our residents remain concerned regarding any loss of privacy and light cause
Willow Farm Action Group	2.3	This sections inclusion a paragraph 2.3 of the contextual importance of Harvey’s Plantation and Local Wildlife Site is particularly welcomed.
Willow Farm Action Group	4.6 – 4.15	The description of key features of the site in terms of landscape, arboriculture and nature conservation is a strong feature of the brief. The stated commitment to nature conservation Harvey’s Plantation and ridgelines and emphasis on maintaining and enhancing hedgerows is also strongly supported.
Willow Farm Action Group	6.16	Support the planting of additional trees and retention of hedgerows
Willow Farm Action Group	7.4	The strong commitment to nature conservation, Harvey’s Plantation and ridgelines is strongly supported.

Gedling Borough Council’s Response

48. The support for the retention of hedgerow and other natural features is noted. Policy LPD 35 of the Local Planning Document states that development proposals should incorporate existing and new green infrastructure to reinforce the character of streets and spaces. The Willow Farm Development Brief adds further detail at paragraph 6.18 which states the hedgerows on the north and west boundaries should be retained and improved. The paragraph goes on to state that the applicant should consider the retention of other existing hedgerows features as boundary treatments of amenity features to

retain the historical field boundary pattern. It is considered that this guidance is sufficiently strong and no changes are needed.

49. Policy LPD 21 of the Local Planning Document includes a policy requirement for public open space to be at least 10% of the site area. The exact amount and location of open space and greenspace will be considered as part of the planning application process.

Unstable land

Respondent	Ref	Representations
Local Residents	General	During the Green Farm Lane development an enormous amount of rubble and earth was tipped to the rear of the bungalow. Some action was taken to ensure the builder removed this rubble but it was not returned to the original level and therefore concerned that the ground could be unstable and/or result in overlooking and obscuring light.

Gedling Borough Council's response

50. Policy LPD 8 (Unstable Land) of the Local Planning Document is in place to deal with any potential ground instability. Ground conditions are matters that can be considered at the detailed planning application stage.

Consultation including the involvement of the community

Respondent	Ref	Representations
Local Resident	1.5	Whilst the Willow Farm Action Group (WFAG) attended numerous meetings, minutes of which you will have on your records, I have no sense whatsoever that our views have been heard, or that any attempt has been made to reflect the views of the local residents we represent in the decision making process relating to the development of Willow Farm. I believe that regardless of the views of the local residents, the Borough Council's decisions were made from the outset and the supposed consultation with the WFAG has been nothing but a charade, and a disingenuous attempt to persuade local people that their views matter.

Respondent	Ref	Representations
Local Resident	1.5	Cannot see that the brief has in fact addressed any of the concerns of WFAG and invite the Borough Council to explain in what way any input from WFAG has shaped this brief. I believe the comment that such community input is valuable to be misleading as there is no evidence that it has had any material effect on the development brief.
Local Resident	1.5	The document has the title "Sites to the North East of Arnold".
Local Resident	n/a	The Statement of Community Involvement states: We will publish comments received and/or provide a summary as soon as possible and explain how these comments have been considered when decisions are taken"
Willow Farm Action Group	1.1	We note that the feedback we gave at the June 2019 meeting, that the 1st draft of the Development Brief lacked a clear set of aims, has been addressed at paragraph 1.1 of the document. This is a welcome improvement.
Willow Farm Action Group	1.7	Welcome the statement that the draft development brief can be amended where appropriate following consultation.
Willow Farm Action Group	4.1	Acknowledge the positive measures adopted by the Borough Council to ensure that local residents were made aware of and invited to comment on the brief. Approximately 400 homes received individual letters and flyers. Consider that the additional measures adopted by the planning authority should be recognised as good practice.

Gedling Borough Council's response

51. The Borough Council is grateful for the input and assistance of the Willow Farm Action Group and for their efforts in distributing the flyers prepared by the Borough Council and raising awareness generally. It is considered that there has been a good and healthy response to the consultation as reflected by the number of respondents and the comments they made. The comments by the Willow Farm Action Group about the document now having a clearer set of aims and expressing support for the two key objectives and four development principles is welcomed.

52. Turning to the respondent's comments about the Statement of the Community Involvement. This is a document that must be prepared by the Borough Council to set out its policies covering public consultation on local plans,

supplementary planning documents and planning applications. It is available from the Borough Council's website here:

<https://www.gedling.gov.uk/resident/planningandbuildingcontrol/planningpolicy/consultations/>

53. A report of responses was prepared following the publication draft of the Local Planning Document in May 2016 and published on the Borough Council's examination page website. This included a summary of the comments made on the publication draft of the Local Planning Document (May 2016) and the Borough Council's response. The report of responses is available from the following page and the reference document is **LPD/REG/04**:

<https://www.gedling.gov.uk/lpdexamination/examinationlibrary/>

54. It is acknowledged that the reference in the title to "Sites North East of Arnold" was an administrative error, however, copies of the draft Willow Farm Development Brief were published with the correct title and placed in the Civic Centre, Carlton Library, Gedling Library and on Borough Council's website.

55. In relation to the points made about the community's input, this has been valuable. A number of amendments were made to the draft version of the Willow Farm Development Brief before the consultation as a result of discussions with the Willow Farm Action Group. These include:-

- The inclusion of new aims listed under paragraph 1.1.
- A number of objectives/development principles put forward by the Willow Farm Action Group as set out under key development principles in paragraph 5.1.
- The removal of the emergency access (a further action as a result of this consultation is to remove the emergency access notation from Figure 3 which was included in error).
- Additional text relating to the need for developer contributions towards school places and clarity that this is the responsibility of the Local Education Authority (see paragraph 5.4).

Other respondent's comments

Respondent	Ref	Representations
Sport England	General	Given the development is for 100 dwellings, Sport England would not wish to be consulted on any future planning applications.
Coal Authority	General	The Willow Farm Development Brief area does not contain any surface coal resources or recorded risks

Respondent	Ref	Representations
		from past coal mining activity at shallow depth. On this basis we have no specific comments to make.
Historic England	General	No comments
Natural England	General	No objections

Gedling Borough Council's response

56. The comments of the Coal Authority, Historic England, Natural England and Sport England are noted.