

## **Appendix B**

### **Local Planning Document**

### **Report of Consultation - Topics**

**May 2014**

## Introduction

The Local Planning Document will be the second part of the statutory development plan with the Aligned Core Strategy being the first part. This Report of Consultation document follows on from the Issues and Options stage of the Local Planning Document. A public consultation took place on the Issues and Options stage during an 8 week period between October and December 2013. The Issues and Options document asked for views on the most appropriate sites and policies to address the Borough's development needs to 2028.

The Aligned Core Strategy has been prepared following close co-operation between Broxtowe Borough Council, Gedling Borough Council and Nottingham City Council. It will be the key strategic planning document for Gedling Borough and will perform the following functions:

- Define the spatial vision to 2028;
- Set out the number of spatial objectives to achieve the vision;
- Set out the spatial development strategy to meet these objectives;
- Set out strategic policies to guide and control the overall scale, type and location of new development (including identifying any particularly large or important sites) and infrastructure investment; and
- Indicate the numbers of new homes to be built over the plan period.

The Aligned Core Strategy is expected to be adopted in summer 2014.

The purpose of the Local Planning Document is to provide more detailed policies and deal with those issues not considered to be 'strategic' in the Aligned Core Strategy. The Local Planning Document will set out planning policies on a range of issues including:

- which of the non-strategic housing sites should be developed;
- how much affordable housing will be sought;
- what density homes should be built at;
- how development should be designed;
- where renewable energy can go; and
- which parts of the Borough should be included in the Green Belt.

This document provides a summary of the key issues arising from the consultation on the Issues and Options stage. It does not set out every comment made.

To access the original comments for the full details, please visit the Local Planning Document Issues and Options consultation web page at the following address:

[https://consultplanningpolicy.gedling.gov.uk/consult.ti/lpd\\_io/listresponses](https://consultplanningpolicy.gedling.gov.uk/consult.ti/lpd_io/listresponses).

For ease of reference, this document covers a number of topics; a second document sets out the comments received regarding specific areas of the Borough. The topics covered in this document are:

- Climate Change
- Green Belt
- Housing Mix and Choice

- Design and Density
- Employment Land Supply
- Town Centres and Retail Development
- Contamination and Pollution
- Historic Environment
- Open Space
- Transport
- Approach
- Other Issues

The next stage in the preparation of the Local Planning Document will involve drafting policies and identifying specific sites for allocation. The Council will consider the key issues arising from the consultation on the Issues and Options stage alongside the technical evidence. The technical evidence relates to many of the topics listed above and includes evidence prepared in support of the Aligned Core Strategy and also the additional evidence to support the Local Planning Document. Further consultation will take place during the summer of 2014 which will comprise a series of topic based and site based workshops.

## **Climate Change**

### **Renewable Energy**

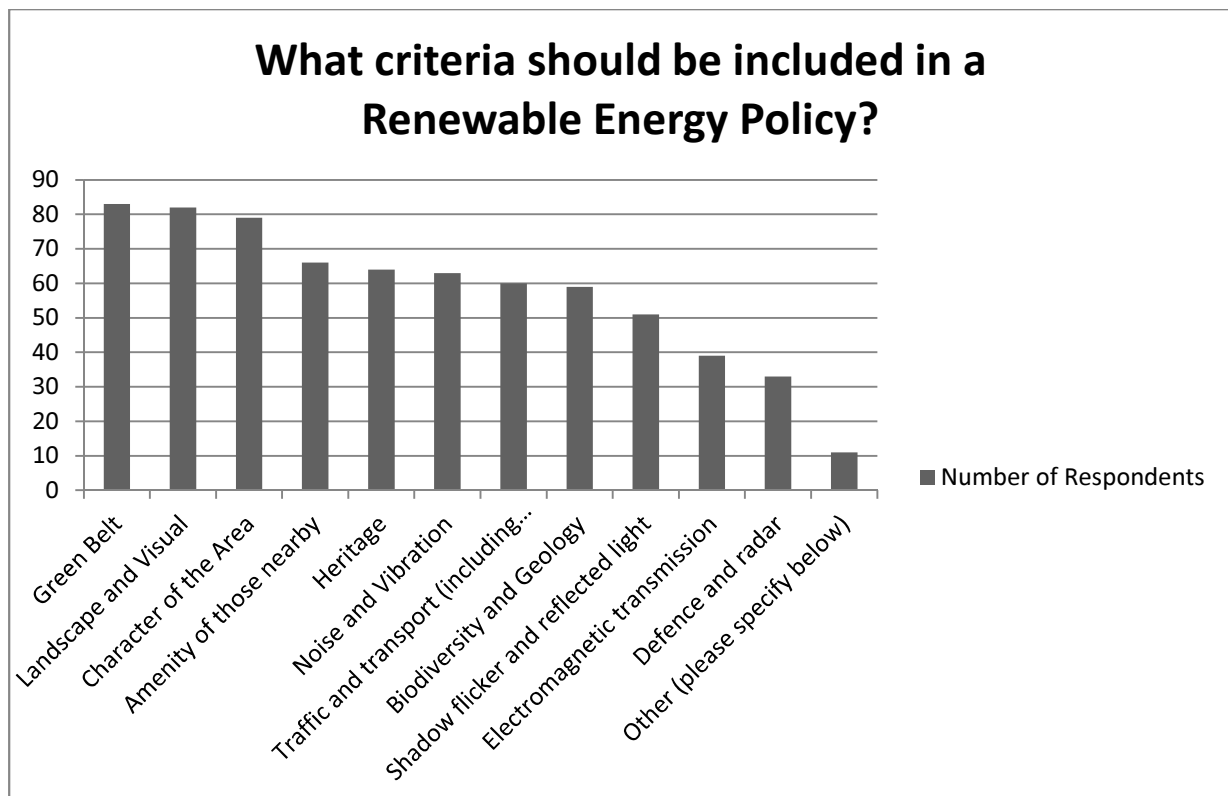
There were a small majority of respondents in favour of identifying areas as suitable for renewable energy with 53% of the 86 respondents in favour. Respondents commented that there should be consultation on which areas could be developed for renewable energy taking account of sensitive locations where construction would degrade the immediate environment.

Those opposed to the identification of suitable areas considered that applications should be considered on their own merits and that identifying a suitable area would give rise to adverse cumulative impacts as has occurred along the A614 between The White Post and Rufford Park. One resident stated that the need for renewable and low carbon energy must not be allowed to override consideration of the environment.

A number of respondents, mainly local residents, identified that they were opposed to the development of wind turbines, especially on Green Belt land, within Gedling Borough. The impact on the landscape, heritage and the character of the area were the main reasons given. One resident pointed to academic research which found that turbines produce more low-frequency noise than previously thought and that ETSU-R-97 (the standard used to assess the noise impact of wind turbines) was no longer an appropriate measure. The use of brownfield sites for renewable schemes was supported by a number of local residents. One developer, however, considered that a Green Belt location should not automatically preclude development of renewable energy schemes.

A number of residents who responded identified support for solar panels and energy efficiency measures to be incorporated into new developments. The use of wood fuel was identified by the Woodland Trust while hydro power was also mentioned. The Environment Agency, however, noted that hydropower schemes can be complex and need to be designed and managed to avoid unacceptable impacts on fish, the water environment and communities.

The graph below sets out what criteria respondents considered should be included in a policy for renewable energy schemes:



One respondent considered that some of the identified criteria were more important than others and should be given relative priority. Nottinghamshire County Council supported the inclusion of Landscape and Visual Impact and recommended that a similar approach to that taken by Newark and Sherwood District Council should be adopted allowing consideration of cross-cutting and cumulative effects. In terms of heritage, English Heritage identified a number of guidance documents they have produced to help consider the historic environment in planning decisions and policy development.

There was a mix of responses to the question on District Heating. A number of respondents were positive about District Heating and identified that every effort should be made to conserve energy and generate clean energy. The potential for small scale schemes was identified by two respondents who considered these should be mentioned in the policy. Birmingham city centre was a location put forward as an example of where it has proved successful. The use of such schemes as part of large scale or mixed use sites was identified as was the potential at landfill sites. Teal Close and Gedling Colliery were two specific sites mentioned.

A number of respondents, however, opposed the use of District Heating schemes. They highlighted a number of issues:

- care needed over emissions;
- no significant heat generators in the Borough;
- public procurement ineffective;
- benefits overstated; and
- the failure of a scheme in St. Ann's 25 years ago.

## **Managing Flood Risk**

A large majority of respondents (80%) considered there was a need for further policy on flood risk. A very large number of those supporting the need for further policy on flooding raised specific comments and concerns about flooding in Woodborough (please see below). A developer stated that any local policy should not repeat the NPPF.

Linby and Papplewick Parish Council considered that the River Leen/Daybrook Strategic Flood Risk Assessment was not adequate for purpose and not prepared in accordance with the advice in the NPPF. The Parish Council also considered that deletion of Environment Policy ENV 41 of the Gedling Borough Replacement Local Plan would put neighbouring district areas at risk.

Burton Joyce Parish Council commented that it was concerned that the issue of flood risk is being moved down the River Trent because of defences implemented further upstream and there was a need for more downstream mitigation.

The Environment Agency referred to the need to apply flood risk policy to windfall sites and that their preference was for the sequential test to be referred to in the LPD. Severn Trent Water placed more emphasis on facing the consequences of extreme rainfall and made reference to their publication "Sewers for Adoption" which guides developers to accommodate floods which exceed the design capacity of the system. Natural England and the Woodland Trust referred to the use of natural processes and the role of green infrastructure across the wider catchment as a means of managing flood risk downstream.

### Areas of the Borough where surface water runoff has caused problems

A large number of respondents from Woodborough referred to flooding incidents in the Village which had become more frequent over the last 15 years. Respondents referred to occasions when Main Street was inundated with flood water and which had also flooded into nearby properties. People considered that this flooding occurred due to surface water run-off and inadequate drainage systems (including backing up and inadequate capacity of pipes/drains along Main Street) made worse by recent development in the village. The topography of the village (set in a valley) was also a factor identified with surface water runoff being a feature of the relatively steep sloping valley sides and prevalent clay soils.

These respondents considered that the provision of a larger drainage system alone would not be sufficient to alleviate the problem. A possible solution put forward in numerous responses was the provision of regulatory lagoons at various collecting points around the village. Some respondents considered that a wider catchment approach to managing flood risk in Woodborough was appropriate and more evidence was sought on the causes of flooding. People thought that the provision of regulating lagoons, increased capacity to the drains/sewerage system and the proper management of field drains was needed. However, concerns were expressed that improving drainage in Woodborough would not necessarily solve problems and may simply move the problem downstream.

Burton Joyce Parish Council identified that Chestnut Grove, the lower end of Lambley Lane and Main Street, Burton Joyce were prone to flood. The Parish

Council called for drains to be cleared more regularly and greater control exercised over new development so as to reduce flood risk elsewhere. Some respondents mentioned that flooding within Lowdham and Oxtun in the adjoining District of Newark and Sherwood was also a problem.

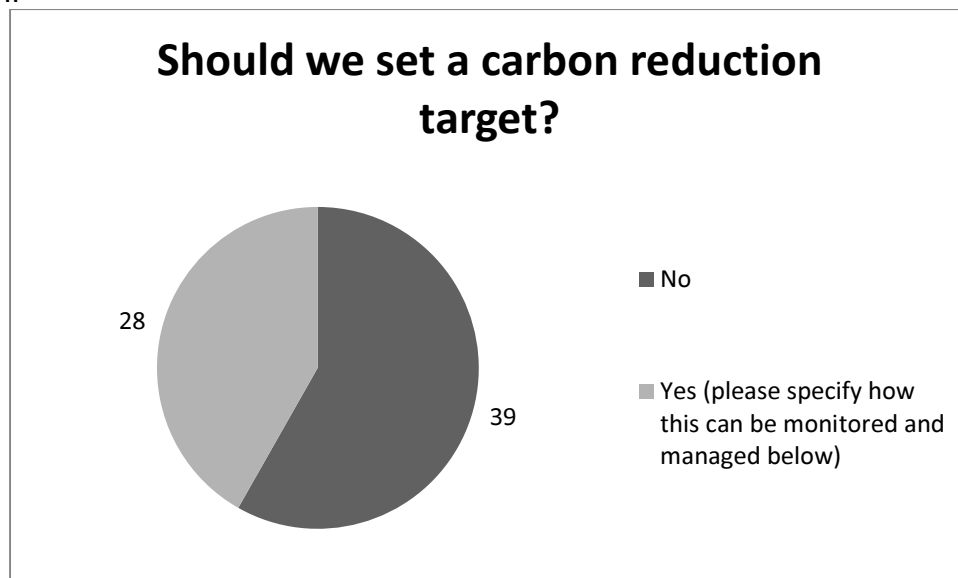
Calverton Parish Council along with other respondents mentioned that surface water flooding in Calverton occurred and identified: Main Street, The Nook, St Wilfred's Square, Cloverfields, Park Road East and Mansfield Lane. Respondents from Calverton mentioned the need to upgrade the drainage/sewerage system, to avoid development on rising ground and have regard to local geology and topography. The specific issue of rising water table due to mine water at the former Calverton Colliery was raised.

One respondent mentioned problems at the Kighill Lane/Longdale Lane road junction in Ravenshead where surface water runoff from the adjoining field onto the highway was considered a hazard partly due to mud being deposited on the road surface.

The Environment Agency recommended that a surface water management plan should be prepared in areas where there have been problems. Severn Trent Water Authority stated they would work closely with the Environment Agency and new development should be supported by a surface water management plan.

### **Carbon Reduction**

There was a small majority opposed to setting a carbon reduction target in the Borough.



Developers and planning consultants considered that the ACS and NPPF are sufficient and that targets often result in box ticking rather than the holistic approach required. A number of respondents identified that this was an issue that could only be addressed at a national level while a two respondents considered that carbon emissions were only a symptom of the real issue of overpopulation. Linby and Papplewick Parish Councils, however, identified that a target could help achieve the

Low Carbon Transition Plan. If a target were to be set, a number of respondents considered that there would need to be a baseline study followed by monitoring.

There was strong support for the use of the Code for Sustainable Homes to assess the sustainability of residential schemes with over 70% of the 33 respondents supporting their use. Use of the Code was supported by both Severn Trent Water and the Environment Agency due to the inclusion of water conservation measures. A small group, including developers, supported the use of the Building Control regime to assess sustainability. It was highlighted by developers and Ashfield District Council that the Housing Standards Review proposes to scrap the Code and rely on a single set of standards to avoid a system of complex and overlapping standards.

A number of measures were identified to assist in reducing carbon emissions. These included:

- use of solar panels and wind turbines;
- transport and support for electric cars;
- a policy of urban concentration to ensure good access to services
- the use of brownfield land to recycle land and protect carbon sinks such as agricultural land;
- Trees to act as carbon sinks;
- Insulation in homes including heat pipes; and
- Education and a borough wide plan of visits, consultations and energy audits.

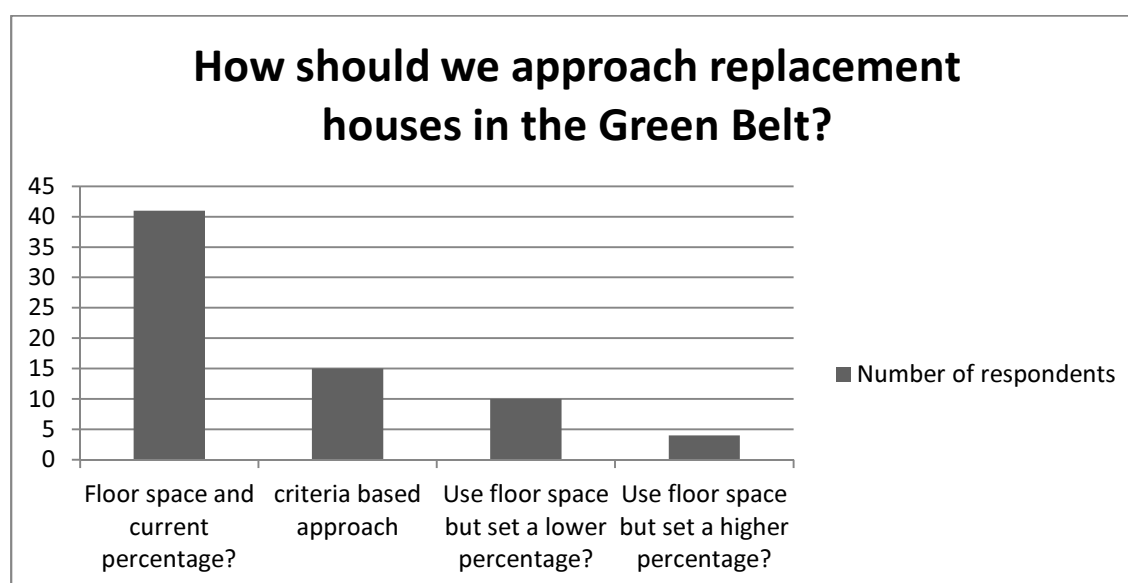
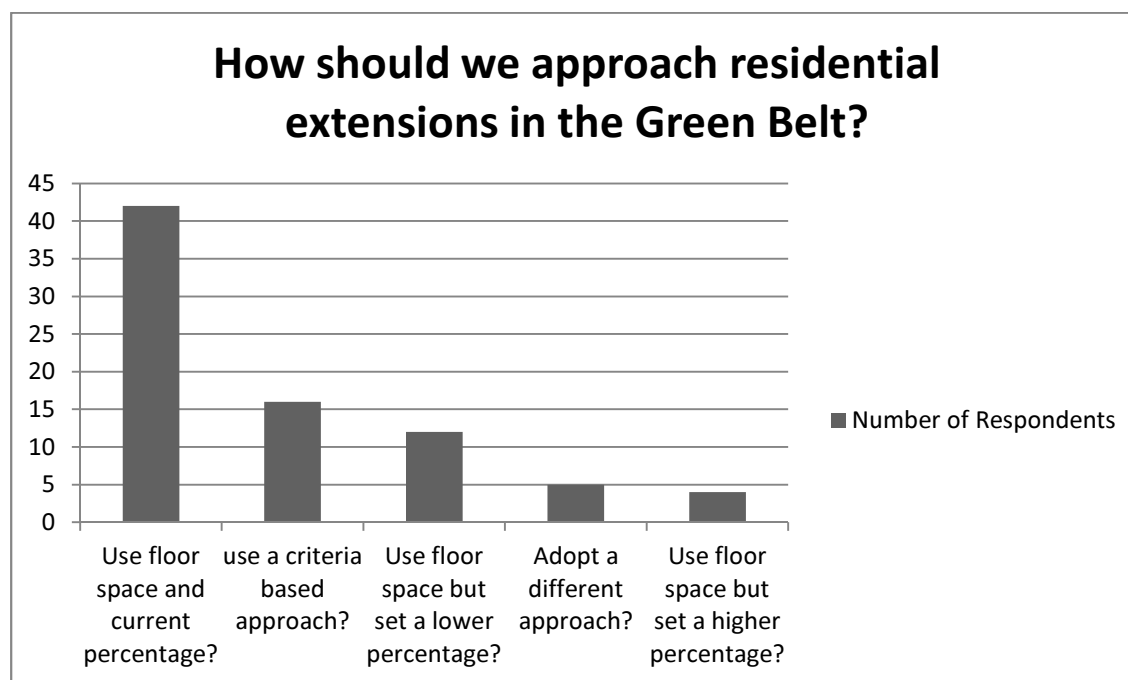
There was, however, a significant degree of opposition to wind turbines from local residents. Turbines were considered to be inefficient and only viable due to feed in tariffs.



## Green Belt

The majority of Gedling Borough is covered by the Green Belt and the need to protect it has been identified by a large number of respondents, especially residents. This section deals with proposals for development within the Green Belt. Matters related to the need to change Green Belt boundaries to allow specific sites to be developed are dealt with in 'Report of Consultation – Sites'.

One of the most common types of development in the Green Belt is the replacement of or extension to residential homes. At present there are policies in place which restrict the amount of extra floor space that can be built as part of any replacement dwelling or extension. There was support for this approach to continue.

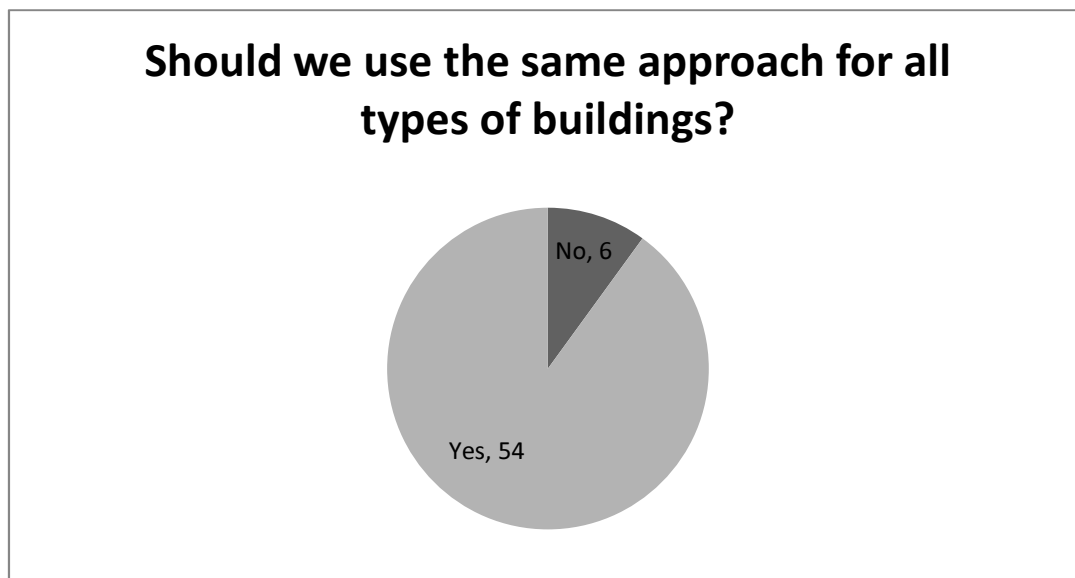


While those responding indicated support for the current approach to continue many who made comments suggested that an alternative approach should be taken. Many, including developers, planning consultants, Nottinghamshire County Council and Linby and Papplewick Parish Councils considered that a more flexible approach would be appropriate. The majority of those who put this forward suggested that a criteria based approach would allow flexibility and not restrict instances where a larger development could result in an improvement. Suggested criteria included:

- Size of the dwelling and plot so that small dwellings were not disadvantaged compared to larger dwellings
- The presence of other buildings on the plot which could be expanded by permitted development rights
- The design of the proposed building
- The construction of the existing building
- Character of the area

The use of volume was suggested by a number of respondents who considered that floor space could result in larger development overall. In terms of the actual percentage 50% was seen as about right by one developer while residents generally considered it too high. A planning consultant recommended that there should be consistency between the percentages for extensions and replacement buildings so that applicants were not pushed towards replacing dwellings.

There was also general agreement that these policies should apply to all types of buildings and not just residential dwellings:



The issue of whether to introduce an Article 4 direction to control the development of curtilage buildings provoked a split amongst respondents. Developers and planning consultants were generally opposed to this as permitted development rights are enshrined within the planning system and if the exercise of these rights was considered harmful to the Green Belt they should be withdrawn nationally.

Residents, local Parish Councils and community groups were overwhelmingly in favour of requiring planning permission for curtilage buildings. Linby and Papplewick

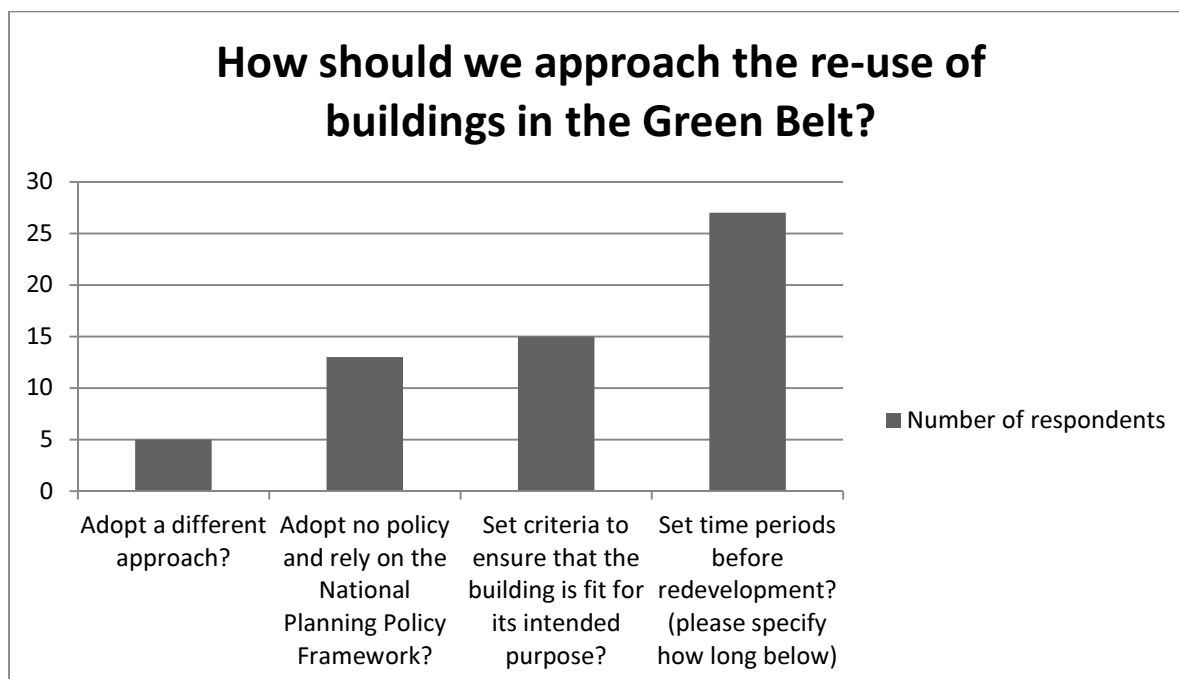
Parish Councils considered that the community should have a chance to have their say on these types of buildings while others considered it necessary to stop the proliferation of untidy and haphazard developments in the Green Belt.

It was also identified that extensions and replacement buildings require planning permission while curtilage buildings did not; requiring planning permission would be consistent and any policy could use a similar approach. It was considered by residents that curtilage buildings which increase floor space by between 15% and 20% of the existing floor space should require planning permission. The need for any policy to consider the following issues was highlighted:

- Percentage of development;
- Overall floor space;
- Impact on visual amenity;
- Neighbours;
- Flooding;
- Materials and design;
- Road access;
- Safety issues;
- Openness of the Green Belt; and
- Heritage.

There was strong support for incorporating the elements of PPS7 which dealt with Agricultural Workers Dwellings into the Local Planning Document with almost 90% of the 55 responses including residents and planning consultants in favour of this approach. It was considered there was justification for detailed advice in the Local Planning Document and that the advice in PPS7 remained a reasonable basis for making decisions. A planning consultant identified that the NPPF refers to 'other rural workers' and there might be a need for two policies on these issues. Parish Councils and residents who responded considered that this policy should be rigorously enforced to ensure that any dwellings built are truly essential.

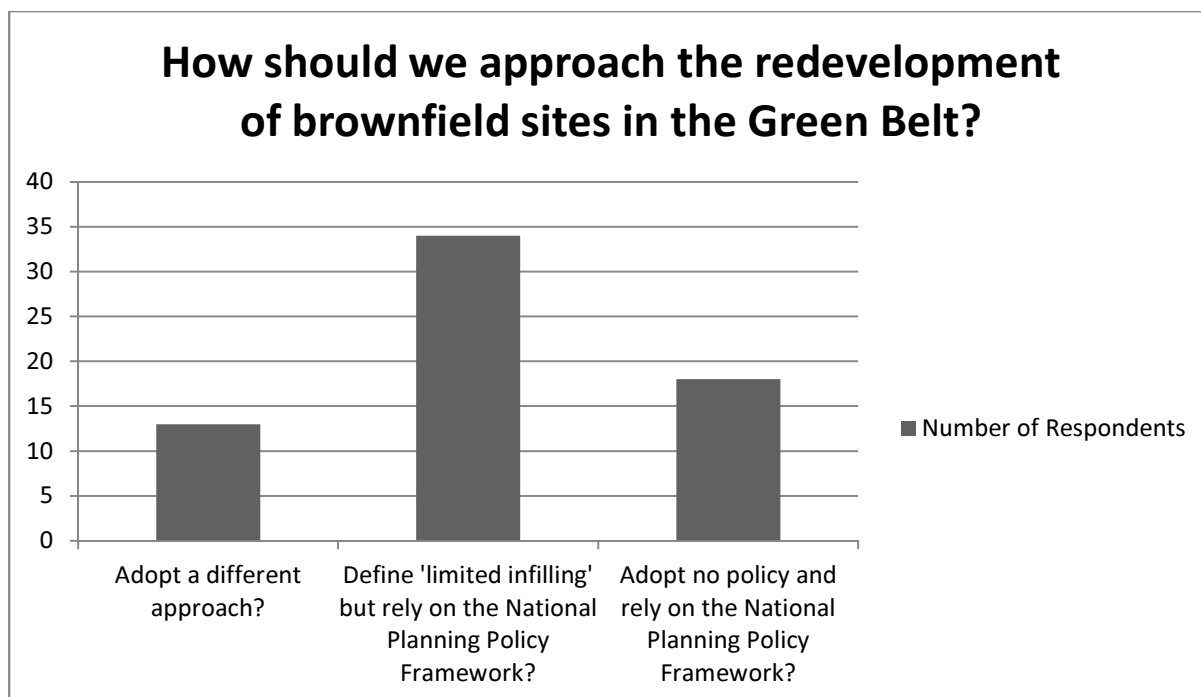
The concern regarding the potential loophole related to the conversion of existing buildings in the Green Belt was shared by the majority of local residents and also by the Parish Councils that responded.



There was generally support for applying a time period of between 10 to 20 years before the change of use and redevelopment of a building could be considered. However, a number of supporters identified that any policy would need to be applied flexibly to avoid buildings falling into disrepair and becoming an eyesore.

Opposition to this policy came from the National Federation of Gypsy Liaison Groups who considered that there was no justification for a different or restrictive approach in Gedling Borough. A planning consultant also commented that, while a policy would be useful, the key issue is whether the building has genuinely been put to the use for which it was originally constructed.

The questions related to the redevelopment and infilling of developed sites in the Green Belt produced a mixed response.



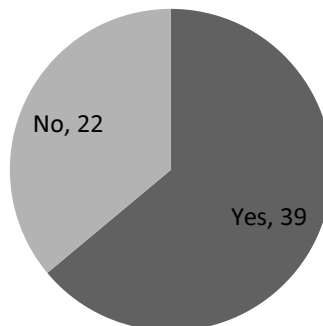
The comments related to this were mixed with a number of local residents opposed to the loss of Green Belt land but supportive of brownfield redevelopment. Linby and Papplewick Parish Councils considered that adopting a definition of 'limited infilling' would allow for progressive development and the better utilisation of existing sites. They, and others, considered that any site should not be over-developed and that the effects on flooding, infrastructure and amenity were also considered. Nottinghamshire County Council recommended that a set of criteria based on determining factors should be developed.

While not opposed outright to a policy, a planning consultant identified that, any definition of limited infilling should not be too restrictive and reflect the spirit of what is intended by the NPPF. One developer did not consider it necessary to include local guidance on infilling as it would be difficult to devise policy that suited all circumstances and there was danger that any policy would be too restrictive.

This developer and many local residents also linked this issue with the approach to limited infilling in villages. Infilling was considered by residents to have an adverse effect on local infrastructure, flooding and local character.

Safeguarded land is land which has been removed from the Green Belt to meet housing need in the longer term (i.e. beyond the plan period). While the majority of respondents were in favour of continuing to identify safeguarded land there was a significant minority who were strongly opposed to it.

## Should we identify Safeguarded Land?



Those in favour of identifying safeguarded land included Nottinghamshire County Council, Burton Joyce Parish Council, developers and planning consultants. They identified that safeguarded land delivers a degree of flexibility enabling the Borough Council to respond to the non-delivery of allocated sites and the lack of a five year supply of housing land.

Linby and Papplewick Parish Councils, Calverton Parish Council, CPRE and a number of local residents opposed the identification of safeguarded land. They considered that it created uncertainty and avoided debates about the impacts of development especially on local infrastructure. It was considered that villages had been 'blighted' by its designation. Ashfield District Council objected to the continued designation of safeguarded land around Hucknall due to the high value of the Green Belt in this area.

A number of other issues linked to the Green Belt were raised by respondents. Both Calverton and Woodborough Parish Councils and a developer considered that there had been no systematic review of the Green Belt. The Parish Councils considered that there were not the 'exceptional circumstances' required to justify development in the Green Belt and no basis for deciding that the areas of Green Belt around Calverton and Woodborough were less valuable than others. The developer identified that the LPD should be the vehicle that sets out the review criteria and shows that Green Belt has been considered.

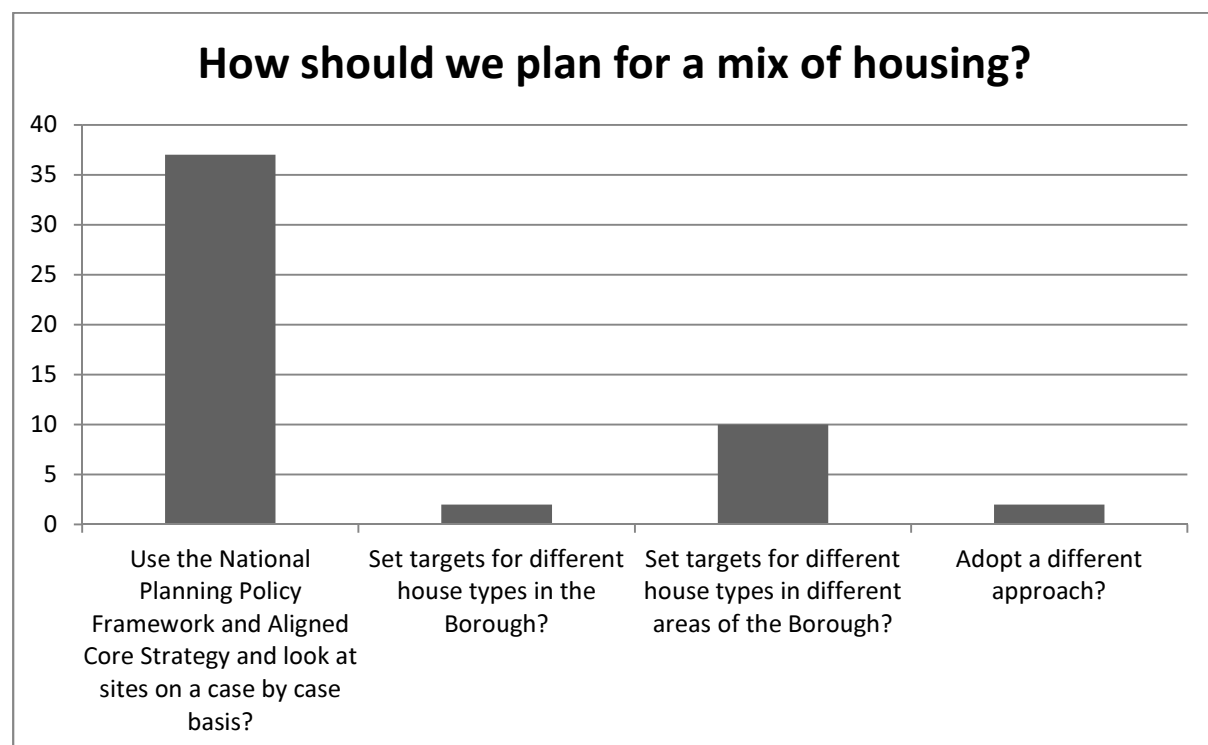
One developer commented on the proposed modification to the ACS which introduced a sequential approach to allocating sites. They highlighted that, when considering development in Bestwood Village, specific work would need to be undertaken to show how this has been applied.

Many of the respondents, especially residents, highlighted the importance that should be attached to the Green Belt and were of the opinion that there should be no loss of Green Belt land.

## Housing Mix and Choice

### Mix of Housing

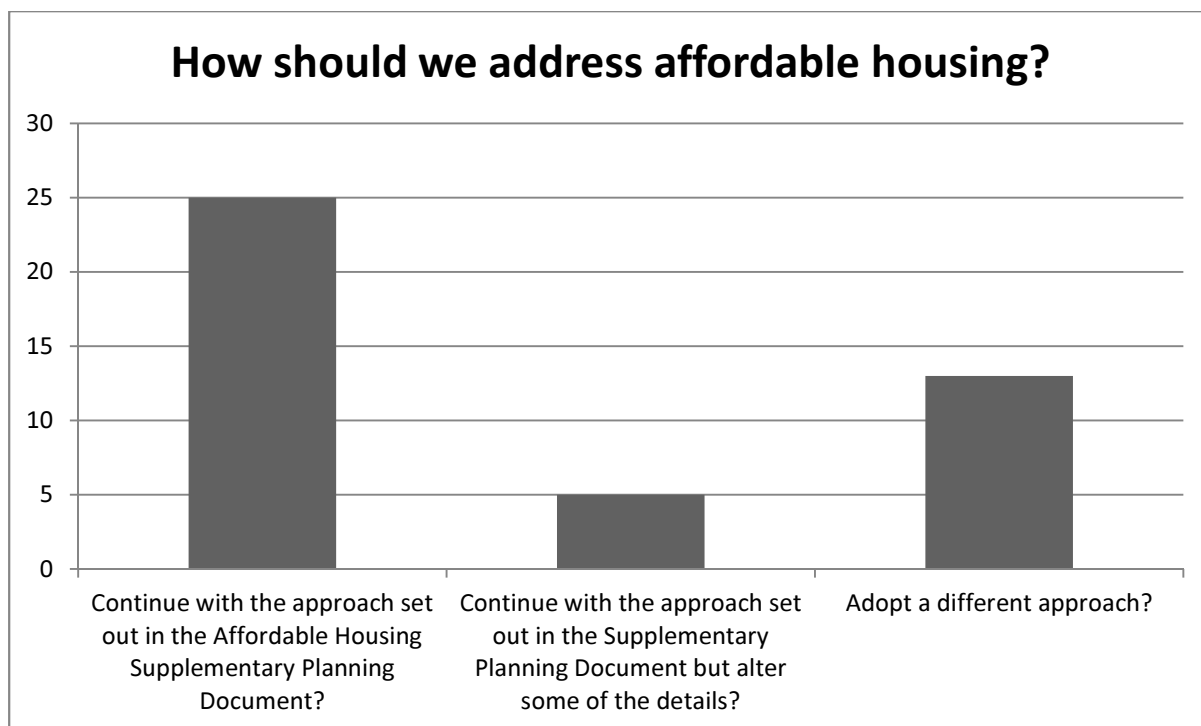
The National Planning Policy Framework requires local planning authorities to plan for a mix of housing based on demographic and market trends and the needs of different groups. The Issues and Options document mentioned Policy 8 of the Core Strategy which refers to the mix of housing tenures, types and sizes in order to create sustainable, inclusive and mixed communities and asked how the Council should plan for a mix of housing. A majority of respondents (thirty seven) were in favour of using the National Planning Policy Framework and Policy 8 of the Core Strategy and look at sites on a case by case basis.



The majority of respondents considered that there should be a mix of housing types. Ashfield District Council stated assessing need on a site by site basis would allow for flexibility but would need to be supported by an up to date and sound assessment of local need. The Co-operative Group thought there was no need for the Local Planning Document to repeat the Core Strategy and national policy.

### Affordable Housing

The Issues and Options document stated there is a need to provide for affordable housing in Gedling. The document referred to the current policy approach set out in the Affordable Housing Supplementary Planning Document which requires a different percentage of affordable housing in different parts of the Borough. A majority of respondents (twenty five) were in favour of continuing with the existing approach set out in the Affordable Housing Supplementary Planning Document.



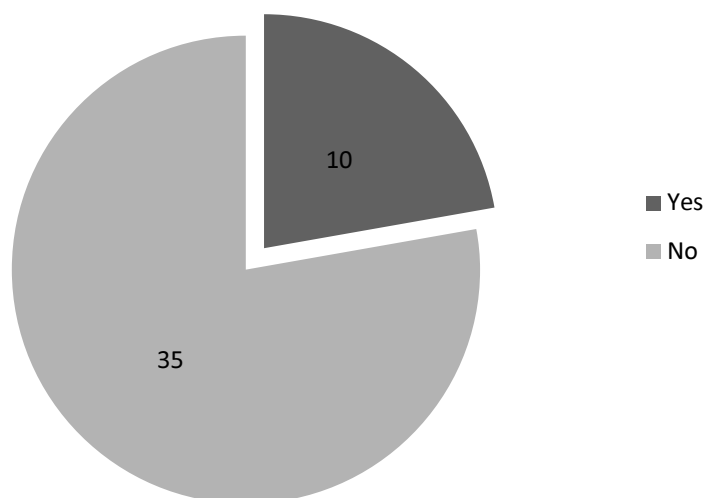
The Co-operative Group (who did not answer the affordable housing question) considered that an affordable housing policy is not required as it would be repeating policy already contained within Policy 8.5 of the Core Strategy which sets percentage housing targets based upon location. Any policy should be based upon objectively assessed needs set without the Strategic Housing Market Assessment and be viability tested to ensure that they are deliverable in meeting the objective. The Home Builders Federation considered that the Local Planning Document should set out in detail the affordable housing provision requirements for specific locations within the Borough. Harworth Estates supported the existing approach to affordable housing provision; however, they felt the viability of development of a site according to its own circumstances as well as the location must also be considered. They recommended a degree of flexibility in the proportion of affordable housing sought is important to help ensure the development is viable and deliverable.

#### **Affordable Housing in Rural Areas**

The National Planning Policy Framework and Policy 8 of the Core Strategy allow for the allocation of sites purely for the provision of affordable housing. The Issues and Options document recognised that the need for affordable housing is often higher in rural areas and asked should the sites in rural areas be allocated purely for affordable housing.



### Should sites in rural areas be allocated purely for affordable housing?



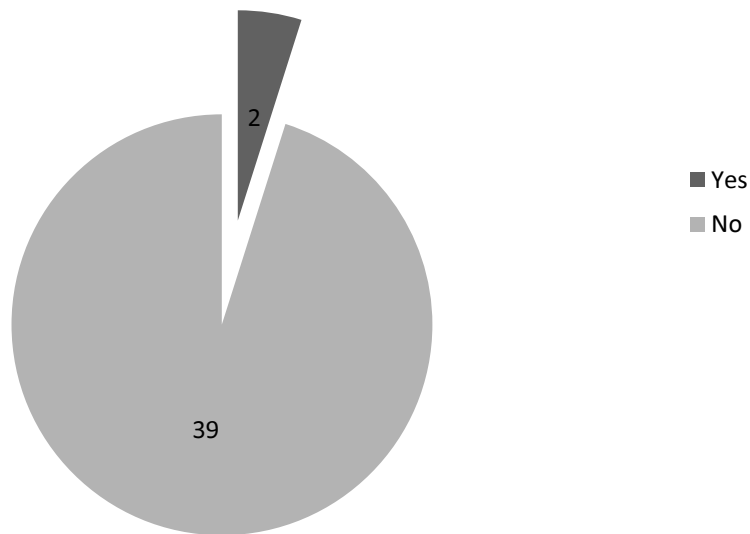
Four respondents were concerned that the allocation of sites in rural areas purely for affordable housing would result in the creation of 'ghettos'. Six respondents said affordable housing in rural areas must be matched by suitable and sufficient infrastructure and amenities.

Langridge Homes commented that rural exception sites for affordable housing are rarely viable and do not make significant contribution to housing supply in rural areas. Schemes which include a mix of affordable and open market houses should be encouraged in rural villages and be more in line with paragraph 50 of the National Planning Policy Framework which seeks to create mixed and balanced communities. These schemes should be considered as exceptions to inappropriate development in the Green Belt.

#### **Gypsy, Traveller and Travelling Showpeople Sites**

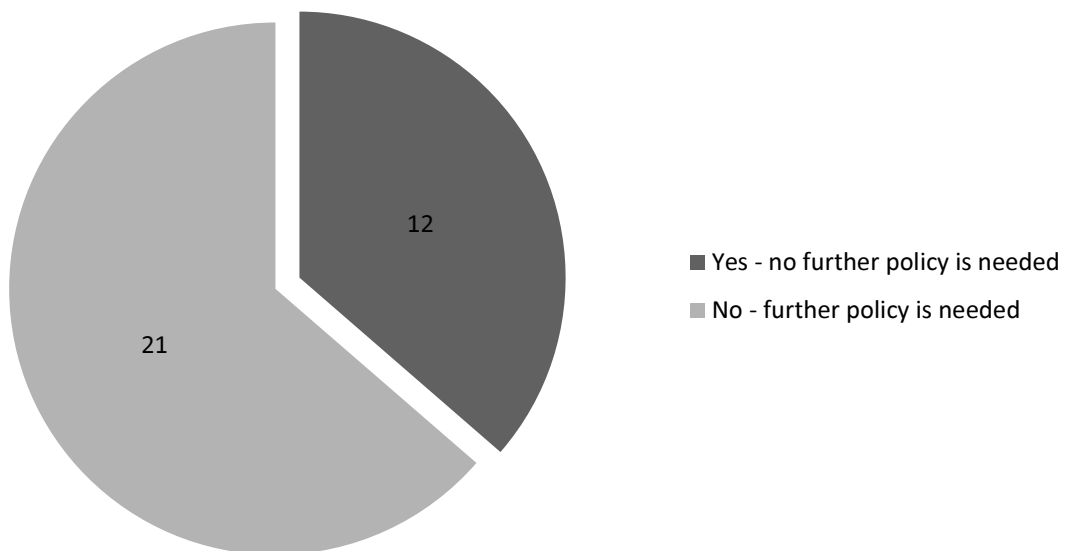
The Government requires that pitch targets for gypsies and travellers and plot targets for travelling showpeople are included in local plans. The Issues and Options document referred to Policy 9 of the Core Strategy which identifies that provision should be made within settlements or as part of the strategic sites identified (Top Wighay Farm or North of Papplewick Lane) and asked whether there are any sites that should be considered for the provision of pitches or plots in line with identified need. One respondents considered that op Wighay Farm and North of Papplewick Lane do not have access to the infrastructure required by the travelling community and suggested Calverton or Carlton would be suitable as they have such facilities.

**Are there any sites that should be considered for the provision of pitches or plots?**



The Issues and Options document also asked whether the criteria in Policy 9 of the Core Strategy are sufficient.

**Are the criteria in Policy 9 of the Core Strategy sufficient?**

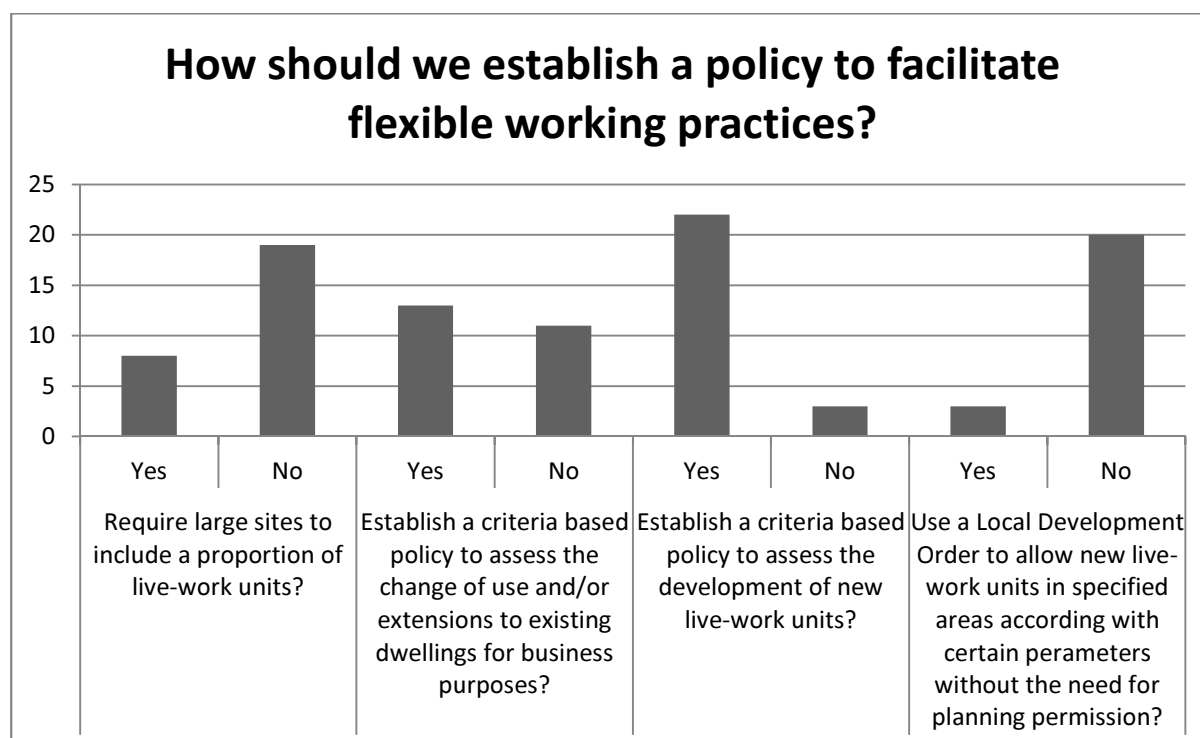


Ashfield District Council considered that additional traveller sites may need to be allocated in order to satisfy the requirements of the CLG's Planning Policy for Traveller Sites to maintain at least a 5 year supply of sites when set against the need. They also highlighted that the emerging revised Gypsy and Traveller Accommodation Assessment (GTAA) will identify future need to 2028. Linby and

Papplewick Parish Council and one respondent argued that the section should be altered to reflect the proposed amendments to the Core Strategy regarding Top Wighay Farm and North of Papplewick Lane as potential sites. The National Federation of Gypsy Liaison Groups considered that Policy 9 of the Core Strategy gives adequate guidance. There were a number of respondents who felt there should not be any sites for travellers.

### Live-Work Units

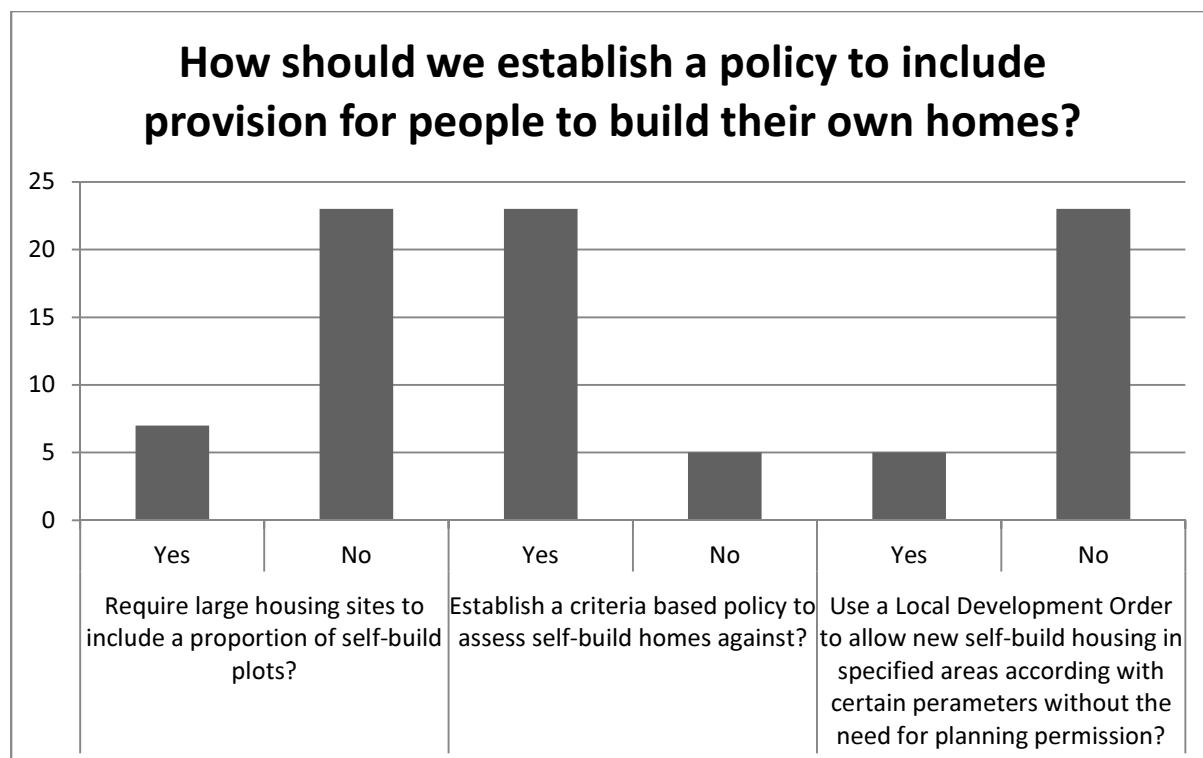
The National Planning Policy Framework requires local planning authorities to facilitate flexible working practices such as allowing business and homes to share the same building. The Issues and Options document asked a series of yes/no questions regarding potential options:



The identification of criteria was the most popular option whilst there was strong opposition to require live work units on large sites and the use of Local Development Orders.

### Self-Build Homes

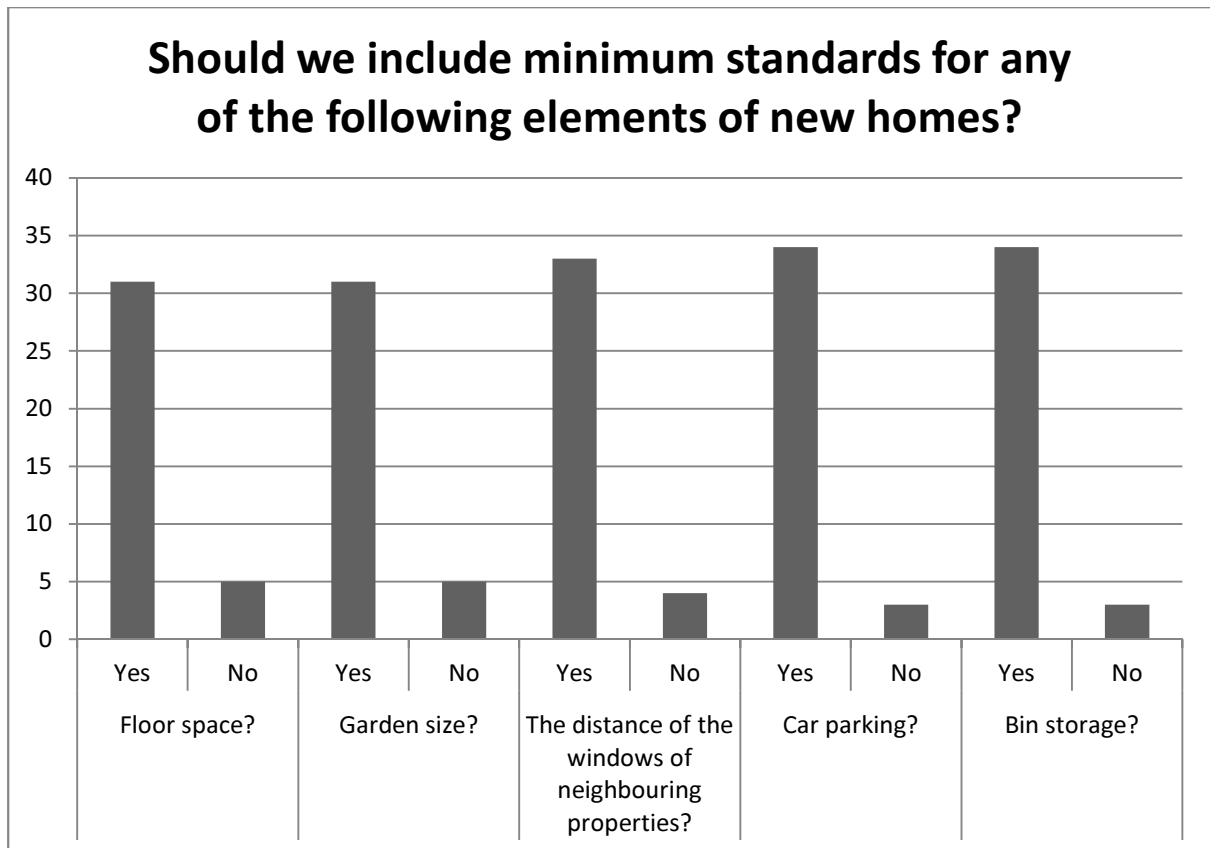
The National Planning Policy Framework also requires local planning authorities to include provision for people to build their own homes. The Issues and Options document again asked a series of yes/no questions:



The responses reflected those for live work units with a preference for the use of criteria and opposition to a requirement for self-build plots on large sites and to the use of local development orders.

#### **New Homes Space Standards**

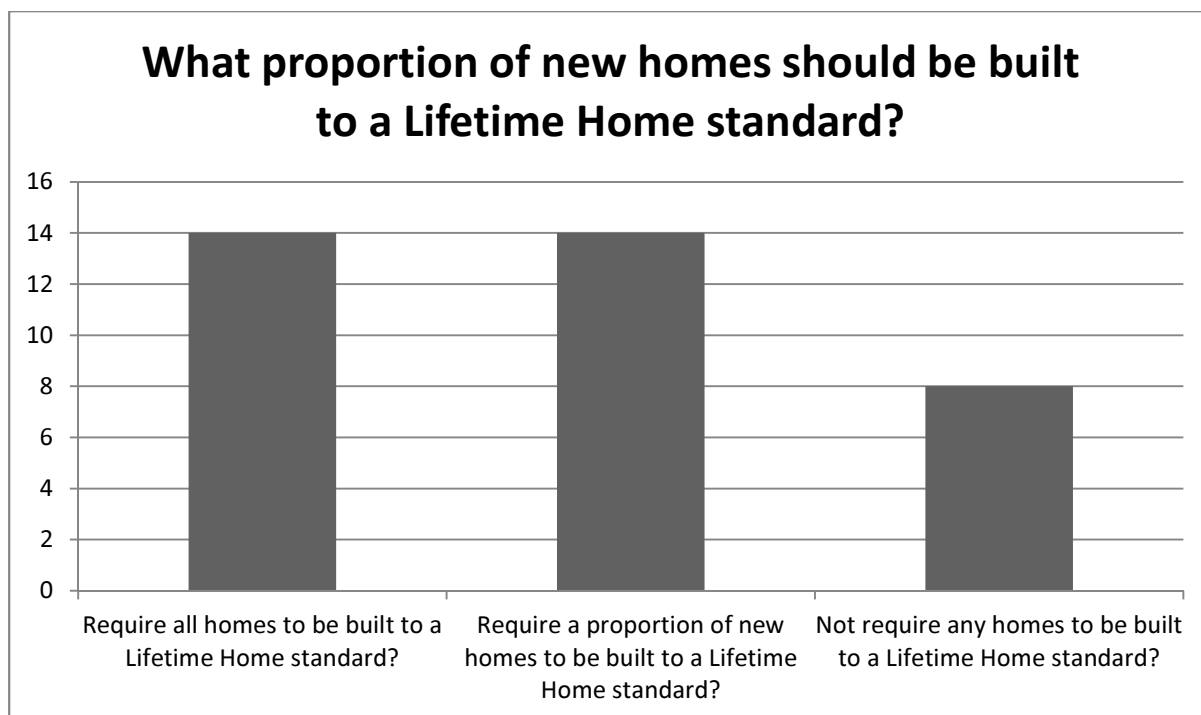
The Issues and Options document referred to Policy 8 of the Core Strategy which sets out that all residential development should contain adequate living space and asked whether the Council should include minimum standards for any of the following elements of new homes: floor space, garden size, the distance to the windows of neighbouring properties, car parking and bin storage. The majority of respondents would like to see minimum standards for all listed elements of new homes.



Developers were generally opposed to the introduction of minimum standards. Langridge Homes identified that these standards are already covered in the national and existing local standards.

### **New Homes Adaptability**

The Issues and Options document highlighted that it is important that new homes are capable of being adapted to suit the needs of different people over the course of their lives and referred to Policy 8 of the Core Strategy which identified this as a priority. The document asked how much proportion of new homes should be built to a Lifetime Home standard.



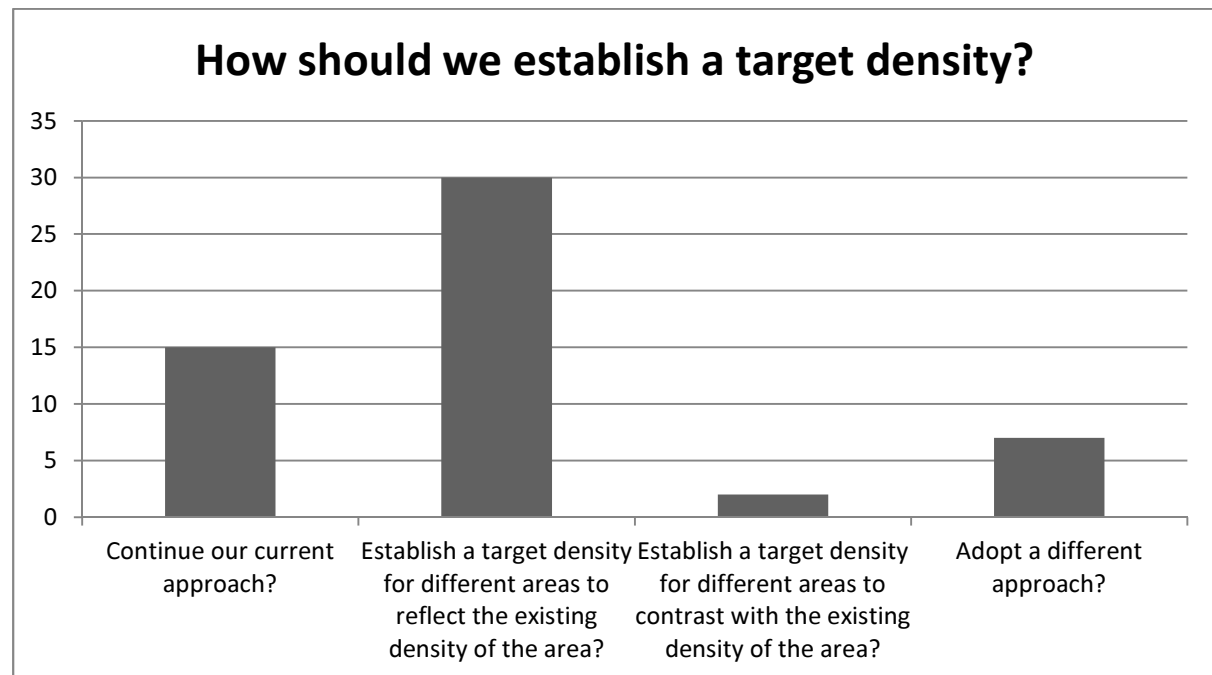
Langridge Homes commented it was not necessary and not viable for the developer or housebuyer to ensure that all new homes are built to meet Lifetime Home standards. They suggested a maximum of 25% of homes on new developments should be designed to meet these standards. Davidsons Developments commented there should be a minimum size / plot number threshold before this requirement is triggered.

Ashfield District Council identified that Lifetime Home standards may be superseded as per the Housing Standards Review. They noted that the review addressed issues surrounding accessibility, space, domestic security, water efficiency and energy with a view to ultimately consolidating the raft of guidance which is currently in place. If Lifetime Homes were to be required, the proportion of new homes would need to be justified and viable. Nottinghamshire Fire and Rescue Service commented that all planning proposals should consider the inclusion of life safety sprinkler systems in domestic premises.

## Design and Density

### Approach to Density

The National Planning Policy Framework requires local planning authorities to set their own approach to housing density to reflect local circumstances. The Issues and Options document asked how the Council should establish a target density. A majority of respondents (thirty) were in favour of establishing a target density for different areas to reflect the existing density of the area. There was a limited degree of support for continuing our current approach.



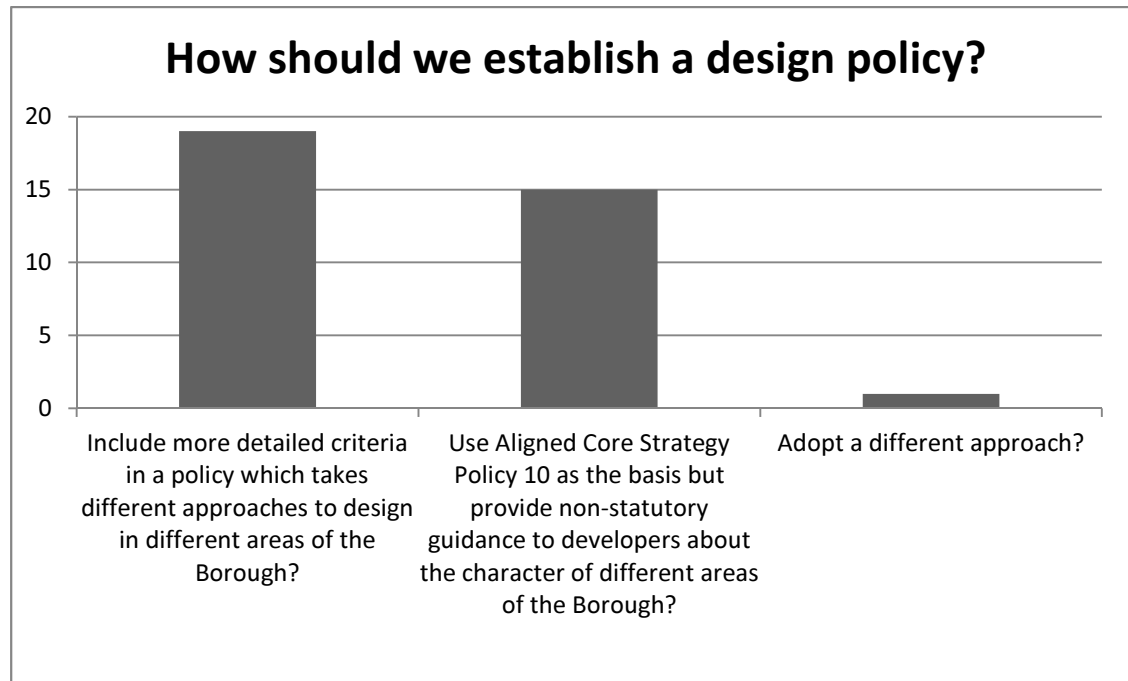
A target density for different areas to reflect the existing density of the area was considered to help the existing character of areas. Comments from residents in Woodborough considered a calculation of the whole village density would set a good benchmark. A number of respondents including Ravenshead Parish Council, the GBC Conservative Group and residents considered that 30 dwellings per hectare was too high in the rural areas as could be seen at Swallow Crescent, Ravenshead; a density of 20dph for Ravenshead was recommended.

A number of developers identified that the National Planning Policy Framework does not specify minimum density targets or guidelines and they did not support the introduction of a density policy in the Local Planning Document. Developers considered that site specific considerations such as landscape and local market demand should be used to determine density. There is a need to deliver high quality development and meet various policy requirements. Policy 8 of the Aligned Core Strategy was considered to provide sufficient guidance.

### Design

The National Planning Policy Framework requires local planning authorities to establish robust and comprehensive local design policies. The Issues and Options document made reference to Policy 10 of the Core Strategy which sets out detailed

objectives and criteria against which the design of new developments can be judged. The Issues and Options document asked how the Council should establish a design policy. A small majority of respondents (nineteen) were in favour of establishing more detailed criteria in a policy which takes different approaches to design in different areas of the Borough.



Ensuring that the design of new development keeping with the existing area was the key focus of a number of responses. Suggestions were made to use locally sourced building materials and development to adopt a vernacular approach which would also help support local jobs (the Borough has a major brick factory). A number of respondents raised concerns over the quality of recent development and the changes these had made to the character of areas. The Co-operative Group, however, quoted paragraph 60 of the National Planning Policy Framework which states local policy should not be used to “impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles”.

English Heritage highlighted that whilst Policy 10 of the Aligned Core Strategy provides a detailed strategic basis in relation to design, development of further criteria specifically relating to the local character would be required. Natural England would like to see additional criteria added which seeks opportunities to incorporate biodiversity within developments which would comply with the guidance set out in paragraph 118 of the National Planning Policy Framework. They made reference to a TCPA document ‘Planning for a Healthy environment – good practice guidance for green infrastructure and biodiversity’.

Nottinghamshire County Council made reference to the Greater Nottingham Landscape Character Assessment as a guide for development.



## **Amenity**

An important part of design is the protection of amenity of surrounding uses. The Issues and Options document stated that the Council are looking to identify issues which could impact on amenity under the following areas:

- From the built environment – such as overshadowing or overbearing;
- Generated by the development – such as noise or traffic;
- On adjacent buildings – such as impact on renewable technologies.

The Issues and Options document asked for other issues that could be included in an Amenity policy. Burton Joyce Parish Council agreed with the amenity issues listed but thought the criteria needed to be strengthened. One respondent stated the overshadowing and overbearing needed to be clearly defined. A number of respondents identified other issues for inclusion in an Amenity policy:

- Noise, traffic and congestion generated by development;
- Impact on landscape;
- Overshadowing or overbearing should be no higher density and no higher height than existing buildings;
- Neighbours' views;
- Noise and infra sound from wind turbines;
- Levels of particulates to assess health risks due to an increase in wood burning stoves;
- Loss of amenity and character of an area;
- More rules and advice regarding new energy technologies and where they can and cannot be allocated;
- Parking;
- Local services – schools, doctors, shops, open green space;
- Lack of amenities;
- Protection of open space and agricultural land, wildlife habitats and biodiversity;
- Employment creation;
- Flooding and surface water run off; and
- Traffic control pedestrian crossing policing.

## **Character Areas**

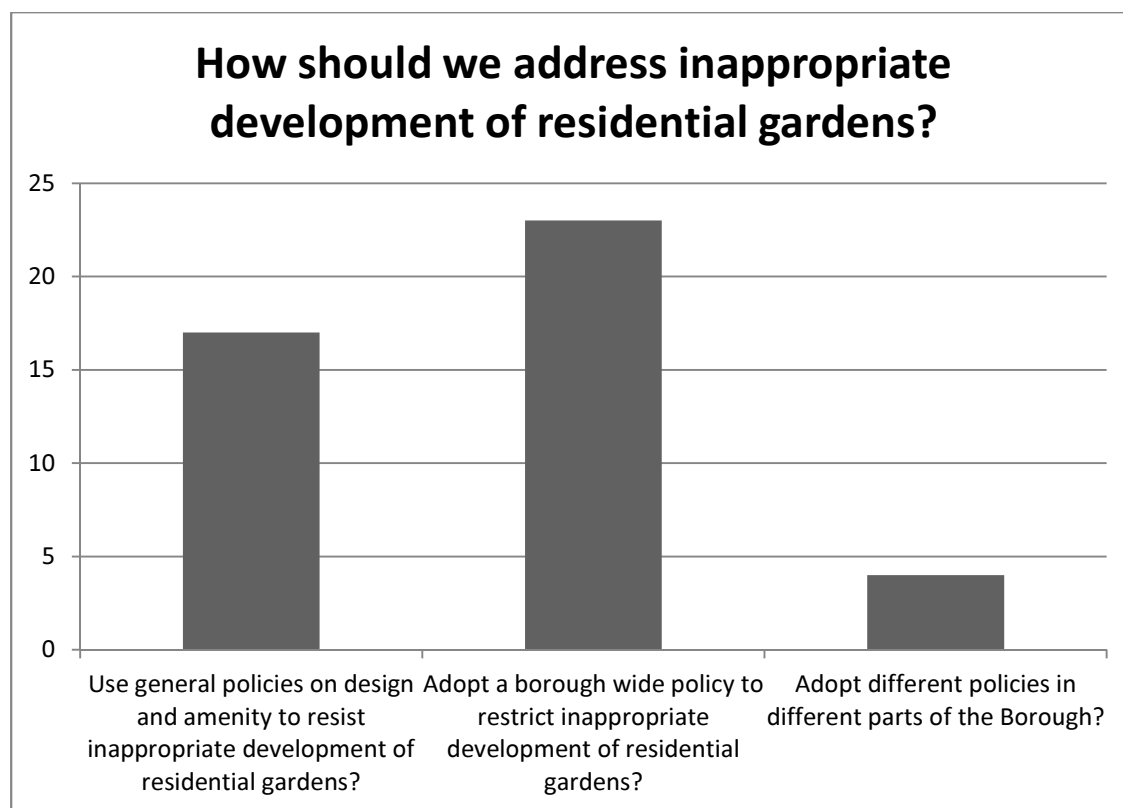
The Issues and Options document made reference to the Special Character Areas at Ravenshead and Woodthorpe and the Conservation Areas and asked whether the Council should identify any other townscapes for which a different approach to design should be taken. Sixteen of the twenty six respondents thought the general policy was sufficient. Ten respondents thought the Council should identify any other townscapes. The following townscape and landscape areas were identified for inclusion:

- All Green Belt, farming and recreational land;
- Bank Hill and adjacent area;
- Burton Joyce riverside;
- Areas around Calverton Conservation Area;
- The whole of Ravenshead village;
- Woodborough Valley; and
- Blidworth, Epperstone and Gonalston (these areas are outside Gedling Borough).

The GBC Conservation Group and Ravenshead Parish Council would like to see the established Special Character Areas in Ravenshead and Woodthorpe retained. It was viewed that the established Special Character Area in Ravenshead serves as an important buffer zone between the very low housing density in Newstead Abbey Park and the higher density within the village.

### **Residential Gardens**

The Issues and Options document made reference to residential gardens and asked what approach should the Council take to restrict inappropriate development of residential gardens. A small majority of respondents (twenty three) were in favour of adopting a Borough wide policy, while there was also support for using general policies.



Landridge Homes, who recommended a Borough wide policy, stated they would rather all development (except extensions and replacement dwellings) in gardens be considered as inappropriate development and 'garden grabbing' should not be used as an excuse for not undertaking a fundamental review of Green Belt boundaries.

The GBC Conservative Group and Ravenshead Parish Council considered that residential garden development has occurred continuously in Ravenshead and contributed significantly to the current size of the village. They stressed that there must be a limit on how long this can continue and that further development in residential gardens in Ravenshead should now cease.

A number of respondents considered that garden development will result in infill development and have negative impact on the existing built environment, services and infrastructure and increase surface water runoff.

Natural England supported the inappropriate development of residential gardens as they are an importance resource for biodiversity.

Aldergate Properties Ltd questioned the need for a separate policy as the National Planning Policy Framework provides a mechanism to deal with this issue.

In terms of the approach this in policy ten of the twenty six respondents recommended the policy should identify the percentage of the garden which can be lost before it is considered inappropriate. Sixteen respondents thought the policy should identify a minimum size of garden to remain following the development. Suggestions for the percentage figure ranged from 10% to 50%. One respondent stated a percentage loss policy would be fairer to both large and small gardens.

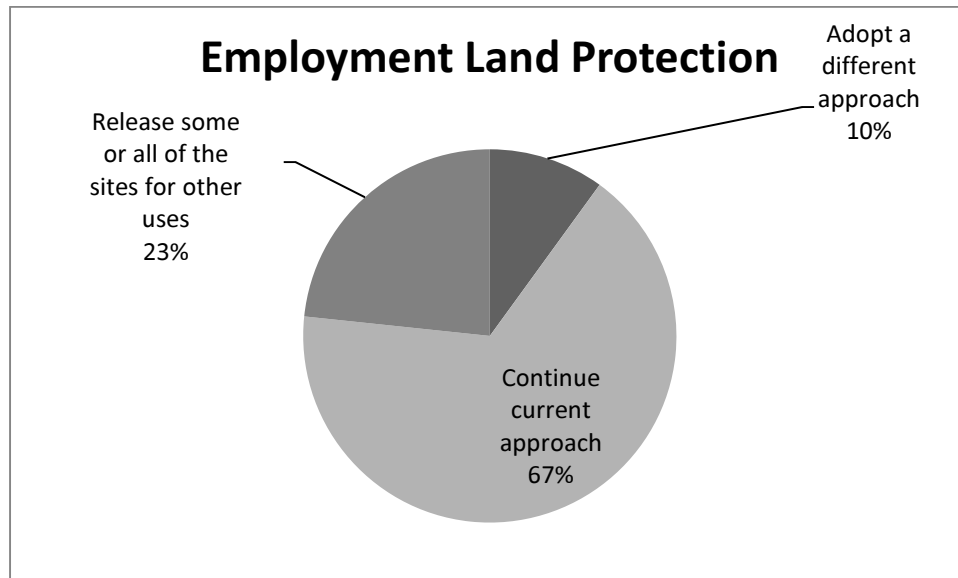
Suggestions for the minimum size figure were:

- 85% of the garden;
- 50% of the garden;
- Equal to twice footprint of existing property;
- Garden size should be relevant to the type of house being constructed;
- Depend upon number of bedrooms. Minimum of 20m by width of the house, greater if more than 4 bedrooms; and
- Over 1 acre and only allow one house per acre of land.

## Employment Land Supply

### Retaining and supporting existing business

Around 30 respondents answered the question about whether Gedling Borough should continue protecting existing employment sites or allow some or all of them for release. There was strong support for continuing with our current approach.



Three respondents representing business/developer interests recommended maintaining the protection of employment sites in order to retain and support local business. One of these respondents expressed concern at the loss of existing protected employment sites which would be worsened if the Top Wighay Farm employment allocation was not confirmed through the Aligned Core Strategy. Another mentioned the importance of improving the quality of existing employment sites for commercial development and the need to provide starter units.

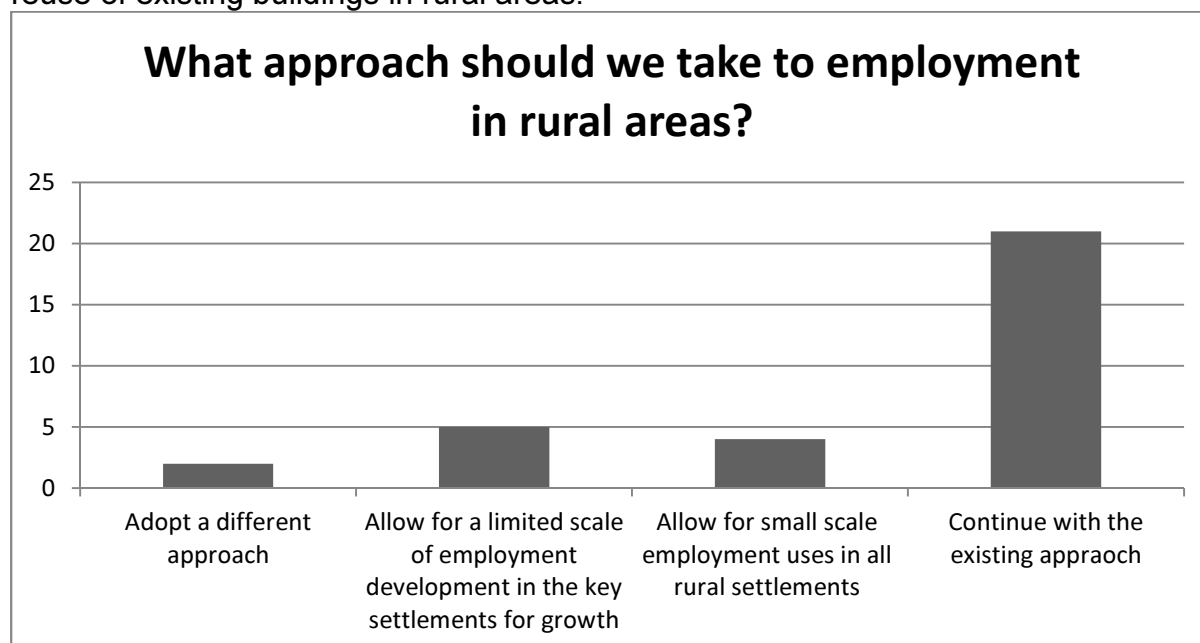
Another developer considered that the Nottingham City Region Employment Land Study which includes an assessment of existing employment sites was out of date and not in accordance with the latest Government policy. This respondent considered the Council should undertake a reappraisal of employment sites and release employment land where protection were no longer required.

Burton Joyce Parish Council and Linby and Papplewick Parish Councils supported the release of employment sites and their reuse for housing. Linby and Papplewick Parish Councils referred to the Employment Background Paper prepared in support of the Aligned Core Strategy which they consider showed an oversupply of employment land against strategic requirements and therefore scope to release employment land for housing.

There was unanimous support for continuing the approach of allowing existing businesses to expand on their existing site subject to amenity considerations and also 100% support for continuing the current flexible approach to permit employment uses on non-allocated employment sites subject to certain criteria.

## Employment in rural areas

There was also strong support for continuing the policy approach that permits the reuse of existing buildings in rural areas.



### In terms of individual comments

- rural employment provision should be appropriate in scale and sustainable;
- should embrace new technology especially relating to the roll out and use of broad band communications;
- support for food production;
- support for the allocation of 2-3 hectares of space for office and commercial uses in Calverton;
- to provide premises that meet modern requirements for commercial industrial uses and that reuse of traditional buildings can be out of step with modern business requirements;
- objection to employment development at Ravenshead.

## Rural Diversification

Some 15 respondents answered this question with several arguing that food production should be supported and that agricultural land should not be built on. Respondents also mentioned that diversification should be in keeping with the nature of the area and appropriate to a countryside location. Natural England stated that they could support low key tourism that encourages access to the countryside where it does not impact on nature conservation sites.

Linby and Papplewick Parish Council called for a policy with clear and firm criteria governing what is allowed in terms of any temporary structures and facilities associated with tourism or public events and to ensure consistency with Green Belt policy.

## Other employment issues

The other made on behalf of the mobile telecommunications operators on the need for a specific policy to support mobile telecommunications development.



## **Town Centres and Retail Development**

Most of those responding to the question on whether to maintain existing town centre boundaries supported the continuation of existing boundaries. There were few comments made in support of this view although one respondent considered that there was too much town centre space available already and that much would depend on achieving affordable rents and free car parking.

In relation to permitting non retail uses in town centres the overwhelming majority of respondents (75%) considered that Gedling Borough should continue with the current policy. Some 15% supported the setting of a use by use figure for each centre and 10% favoured a different approach.

Individuals' comments in support of their response included:

- The need to be flexible about permitting non retail uses and not adhering to rigid numbers;
- Need for market stalls, multiple retailers, town centre management and free parking; and
- Prevent growth in outlets selling unhealthy food.

No specific sites in or around centres were identified by respondents. One respondent considered that in Arnold there was an oversupply of floorspace. A further consultee questioned what evidence was available to support additional floorspace being provided in the various centres. All respondents were supportive of using underused upper floors for residential use and suggested that financial incentives be used to encourage the reuse of upper floors and such an initiatives should be publicised.

A number of respondents felt that there should be no more out-of-town shopping provision or that its impact on town centres should be carefully assessed. The vast majority of people 81% (13 respondents) said that the threshold for requiring retail impact assessment should be 2,500 sq. m. However, some respondents considered that smaller developments could have a significant impact on a nearby centre and Nottingham City Council put forward 1,000 sq. m which is their locally determined threshold.

A number of centres were put forward by respondents as centres in need of enhancement. These centres are as follows:

### **Arnold**

- Arnold is going downhill - the outdoor market is very poor and shabby;
- Further pedestrianize Front Street along its entire length; and
- car parking favours the secondary areas and ASDA and it is difficult to integrate the primary and secondary areas.

### **Burton Joyce**

- Burton Joyce Parish Council stated that plans have been submitted for improvement;
- Pedestrianise Main Street between Wheatsheaf Court and Willow Wong;
- Reuse the Old School Building for community use; and

- Pavements adjacent to the shops are considered unsafe.

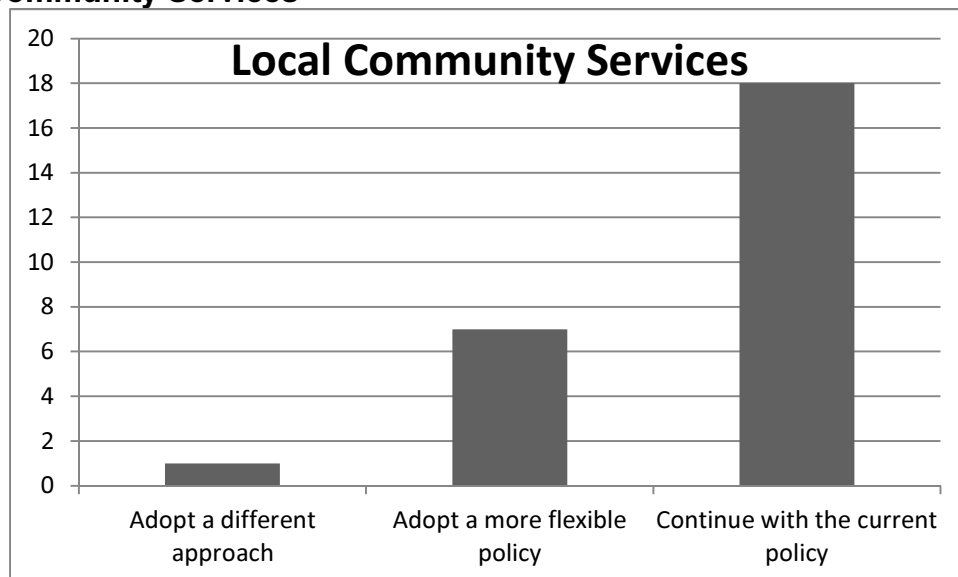
### Calverton

- If development goes ahead Calverton Local Centre is shabby and needs refurbishment this also applies to the Square; and
- Car parking is inadequate.

A few general issues and suggestions relating to the need to enhance centres were put forward which were applicable to all centres:

- More varied local shops; and
- All the options such as environmental improvements, holding events and encouraging a wider range of uses are important but rents and lease terms may be too high for new businesses. Consider artisan workshops/retail uses like the “OXO” Building project in London.

### Local Community Services



There was strong support that the existing policy seeking to prevent the loss of a community facility should be retained. Seven respondents considered that the policy should be more flexible.

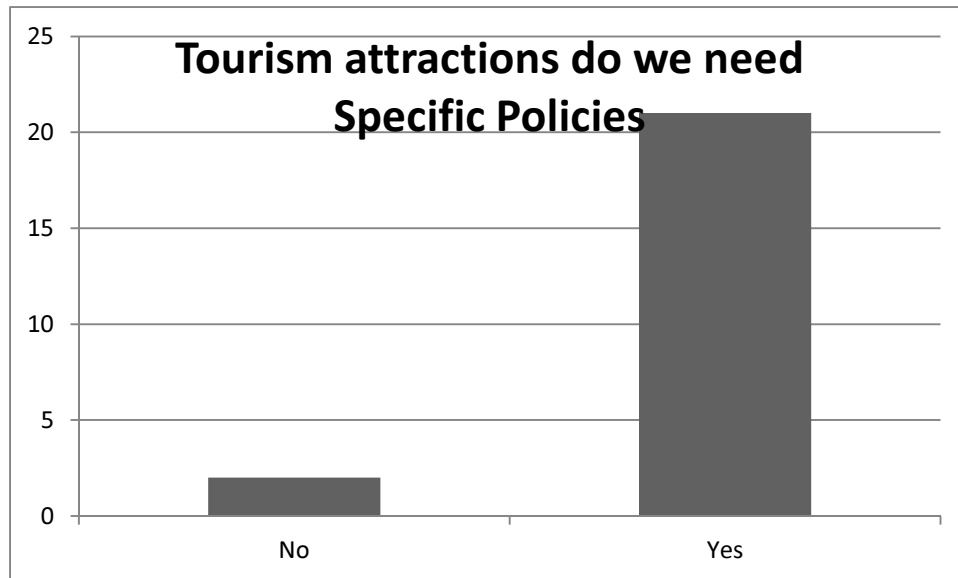
Sport England referred to Gedling Borough’s Open Space Sport and Recreation Strategy 2012 – 2017 adopted in 2012 and did not consider it to be robust or up to date in relation to the needs for playing pitch provision. In particular Sport England notes that the evidence base for playing pitches was based on 2003 data.

The Theatres Trust considered the existing Local Plan Policy C4 to be inadequate as it does not provide any criteria to support and protect existing community facilities nor give guidance to prevent their loss such as criterion requiring the provision of replacement facilities in accessible locations or contributions to existing or new facilities.



Other respondents referred to providing local authority services and facilities in vacant premises, more places of worship and the particular need to plan for increased local community services at Calverton and Ravenshead if more houses are built in these settlements.

## Tourism



A large majority considered that there should be specific policies to protect and guide future diversification of the visitor attractions at Newstead Abbey, Papplewick Pumping Station, Patchings Arts Centre and the country parks at Bestwood, Burnt Stump, Gedling Colliery and Newstead.

Of those providing comments in support of their views, two respondents mentioned the need for good access and parking provision at the various attractions. Two mentioned concerns about the erection of wind turbines which they considered were ruining the landscape and its potential to attract visitors.

English Heritage commented that many of the attractions listed were designated heritage assets and that their future diversification would need to be guided by Local Plan policy and appropriate in terms of them being designated assets. They also considered that there may be opportunities for tourism related projects. Nottinghamshire County Council also supported the inclusion of specific policies to protect heritage assets and to promote further investment.

Linby and Papplewick Parish Councils noted that many of the attractions were in the Green Belt and guided by relevant green belt policy and there was no need for further control. However, they noted that the long term needs of the sites would vary overtime and the needs of the population would also change. They considered that local managers and local communities should have some flexibility to develop their own ideas although these would need to be consistent with planning policies.

### **Out of Centre Shopping**

The majority of respondents supported the existing policy that restricts the type of goods that can be sold in out-of-centre location to “bulky” goods such as decorating and DIY equipment, electrical goods, gardening goods and furniture. One respondent referred to simply relying on the National Planning Policy Framework for policy guidance.

A number of these respondents referred to encouraging City Centre and high street shops. Two respondents considered that Arnold would miss out unless it could attract a Waitrose or Marks and Spencer referring to competition in the Newark area or potentially from Sherwood if a Waitrose or Marks and Spencer were to locate there.

One respondent considered that nearly all bulky goods sales were out-of-centre and that bus services were often poor at these locations. Another respondent queried how supermarkets could be restricted from selling bulky goods.

English Heritage referred to their guidance on the changing face of high streets.

## **Contamination and Pollution**

There was very strong support for continuing the current approach with regard to hazardous substances, with all 24 respondents supporting this. There was also strong support for continuing the approach to contaminated land and unstable land. Residents considered that contaminated land should be developed prior to Green Belt Land. One developer/landowner who supported the use of contaminated land highlighted the additional costs these sites presented and the need for sites to be economically viable. The Gedling Borough Council Scientific Officer recommended a change to wording to capture all sites with potential contamination not just those formally designated under Part 2a of Environmental Protection Act 1990.

The inclusion of policy related to unstable land was supported by The Coal Authority who identified that the approach in ENV4 of the Replacement Local Plan would be appropriate for continuation and in accordance with the NPPF. Burton Joyce Parish Council considered that the Burton Joyce area is more than usually vulnerable to landslip due to unstable steep ground.

The need to protect Source Protection Zones (SPZs) was identified by Burton Joyce Parish Council, the Environment Agency and Severn Trent Water. SPZs are areas defined to protect groundwater sources. Where development is proposed in these areas there needs to be an assessment of the potential impact of both during and after construction. Groundwater is a regional resource which is best protected at the strategic planning stage.

There was strong support for continuing our current approach to noise and light pollution. There was also support for adopting criteria and/or area based approaches to light pollution. Noise was considered to be detrimental to health and wellbeing and should be controlled. Noise from wind turbines was identified and evidence presented of inadequate existing controls with local residents of the view that more stringent legislation was required. Light pollution was also seen as an issue, especially in rural areas or close to wildlife habitats and heritage assets. Reduction in the level of lighting in rural areas and the use of low-energy down lighters were proposed as mitigation.

Similarly, the current approach to air quality was also supported by the majority of respondents. Specific issues of air quality were identified by Burton Joyce Parish Council in relation to the Chettles factory at Stoke Bardolph.

In relation to the designated Air Quality Management Area along part of Mansfield Road (A60) in Daybrook the Gedling Borough Council Scientific Officer identified that a planning guidance note has been prepared for developers to ensure that development is sustainable from an air quality perspective. This guidance note should be formally adopted into Planning Policy through the Local Planning Document. Consideration should also be given to applying the same guidance to other parts of the Borough where air quality is just above the level necessary for the designation of an AQMA.

Both the NFU and Ibstock Bricks Ltd identified that consideration should be given to the impact from existing uses on areas proposed for development; if adequate mitigation is not possible then development should not go ahead.

## Historic Environment

Policy 11 of the Aligned Core Strategy identifies a number of elements of the historic environment which are important to Greater Nottingham as a whole. These elements will include a number of different types of heritage assets including listed buildings, non-designated assets and scheduled monuments. As part of the Issues & Options consultation it was asked whether there were any additional elements of the historic environment which are important to Gedling Borough which should be identified in a future Policy. Elements identified included:

- parishes churches and faith buildings;
- framework knitters cottages;
- the cotton mill industry and steam power along the River Leen;
- Linby Heritage Centre; and
- The Trent River Bank at Burton Joyce.

In relation to the designated assets Linby and Papplewick Parish Council recommended that the value of local heritage assets be strengthened by maintaining an effective public record and protecting the interest of local heritage where development occurs. They also recommended the establishment of the Sherwood Regional Park to strengthen the regional and national context.

English Heritage provided information on specific considerations for listed buildings, conservation areas, historic parks and gardens. They also recommended that it was necessary to explore whether policy on non-designated archaeology and information requirements to address local circumstances were required.

There was strong support for the Local Planning Document to identify a list of 'locally listed heritage assets'. These are assets which do not meet the criteria to be formally listed but are important locally. 95% of the 38 respondents to this question agreed that a local list should be identified.

In terms of the list and required Policy, English Heritage identified that they have produced guidance on how to prepare these while Linby and Papplewick Parish Councils set out that any policy should seek to:

- Identify and evaluate the evidential value of cultural, industrial and environmental history of the area;
- Preserve and enhance historical value of place by establishing the connection between events, people and aspects of life;
- Develop communal value in the richness and diversity of local identity and character; and
- Ensure proposals for change are reasonable, transparent and consistent with relevant established policy and best practice.

Specific assets identified for inclusion in the list included:

- Mortuary Chapel, off Hucknall Road, Newstead;
- War Memorial on Village Green, Tilford Rd, Newstead;
- The School House, Tilford Road, Newstead Village;
- Newstead Wildlife Meadow (Formally Hopping Hill) - an area of public open space between the old cemetery and car park adjacent to the new cemetery; and

- Linby Heritage Centre.

Overall English Heritage recommended that Historic Environment should not be a 'standalone' chapter and that criteria are required in policies relating to climate change, landscapes, green infrastructure and design amongst others.

## Open Space

In terms of the types of open space that will be identified and protected, Ashfield District Council considered that civic spaces such as squares are also important for well-being while Nottinghamshire County Council recommended that categories of open space identified elsewhere in the Local Planning Document should also be covered by this policy. This would include local nature reserves, ancient woodland and the Calverton Mineral Line. The need for a policy on allotments was identified by Nottingham City Council.

The Woodland Trust sought to ensure that trees and woodland are included as a key component of Green Infrastructure. Natural England suggested the inclusion of 'semi-natural green space' in and around urban areas as this contributes to creating places where people want to live and work. Natural England also recommended the use of Accessible Natural Green Space (ANGSt) standards to assess whether access is adequate or not.

A number of specific locations were identified around the Borough for protection:

- Burton Joyce riverside;
- The urban fringe area around Linby, Papplewick and Hucknall;
- Mapperley Golf Course; and
- Moor Pond Wood (with links to the area to the rear of Grange Cottages).

English Heritage identified that many of the examples cited could also be designated heritage assets and this should be recognised in any policy.

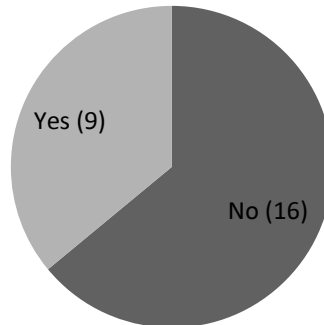
In relation to a policy for Local Green Spaces, Linby and Papplewick Parish Councils considered that any policy should:

- Recognise the value of separation between urban and rural areas;
- Enhance connectivity;
- Establish management plans;
- Safeguard areas from flooding; and
- Safeguarded access for the community for recreational and educational use.

The NFU opposed the possibility of land being designated as Local Green Space without the support of the landowner and recommended that landowners be consulted before the process begins.

As for criteria required in a policy there was a consensus that the Aligned Core Strategy and NPPF contained sufficient guidance.

### Is further open space criteria needed?



Of those who wished to see further criteria included the Woodland Trust identified that irreplaceable habitats such as ancient woodland and ancient/veteran trees should be protected in all but the most exceptional circumstances. Linby and Papplewick Parish Councils considered that the requirement for open space is directly proportional to the density of development and population and recommended that there needed to be a clear definition of new policy for the integration of existing Green Infrastructure in the area around Linby, Papplewick and Hucknall. They also recommended a review of the targets in the ACS to ensure there was no fragmentation of Green Infrastructure assets.

#### Woodland

Members of the public expressed a desire to see all trees and woodland protected. In terms of Ancient Woodland, Nottinghamshire County Council identified that the use of Natural England dataset would be required. The Woodland Trust, however, pointed out that these datasets mostly covered woodland of 2ha or more; many Ancient Woodlands are below this size and should be identified using an approach they have prepared.

The County Council also recommended that a co-ordinated survey of the Borough using the criteria for Ancient or Veteran Trees would be required. The Woodland Trust identified that they have carried out a national survey for Ancient or Veteran Trees which found over 100,000 trees meeting the criteria.

Specific woodland within the Borough identified included:

- North-west of Nottingham Road and Main Street, Burton Joyce;
- Moor Pond Wood;
- Ploughman's Wood, Woodborough; and
- Foxwood between Woodborough and Calverton.

There was strong support for the need for the Local Planning Document to identify both Greenwood Community Forest (100% of 27 respondents) and the proposed Sherwood Forest Regional Park (91% of 33 respondents).



Nottinghamshire County Council recommended that criteria be included in the Greenwood Community Forest policy to ensure the longevity of the trees provided through negotiation. The issue of Sherwood Forest was seen as important generally for the economy and tourism and the proposal to identify the proposed area and include a policy related to the objectives was supported by respondents including Natural England and the Woodland Trust. Linby and Papplewick Parish Council recommended that a policy be included to ensure that Parish maintained woodland was managed in a way that strengthened the character of the area. The NFU, however, cautioned that any policy that sought to limit development within the proposed boundaries of the Regional Park would not be supported by farmers or landowners.

Overall, the Woodland Trust suggested the inclusion of woodland access standards. This would ensure that all residents have access to a range of different sizes of woodland. They recommended that residents should have access to:

- Woodland of 2ha within 500m of their home;
- Woodland of 20ha within 4km of their home.

At present they consider that only 12% of Gedling residents are able to meet these standards.

### **Conservation**

The work being undertaken to consider the designation of a Special Protection Area in the north of the Borough is an important issue which may affect future development proposals across the Borough. Both Natural England and Nottinghamshire County Council have recommended that a risk based approach be put in place and that wording is included to set out the process to go through if a Special Protection Area is designated. This process includes the need to review and potentially modify or revoke allocations or planning applications. The National Farmers Union, however, recommended that any approach should not be too cautious as this may affect farming practices while a member of the public considered that there should be no restriction on recreation activities.

Of the 25 respondents only one considered that Local Wildlife Sites (the current approach) should not be used. This was a landowner who considered that the designation process was flawed and that any policy applied only to sites identified in the Local Plan. Natural England and Nottinghamshire County Council supported the intention to protect these sites as they are essential for protecting the biodiversity of the area and compliment international and national designations. A criteria based policy was recommended as the basis of the approach.

Other comments included:

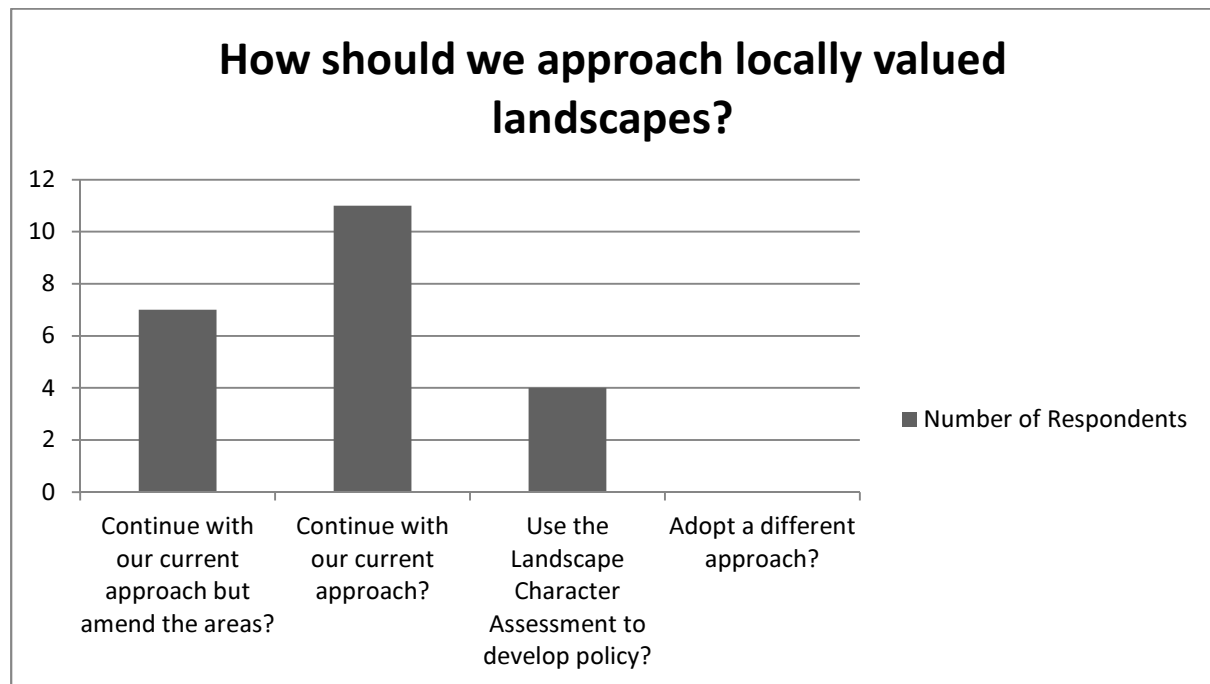
- The need to protect all Sites of Special Scientific Interest;
- Moor Pond Wood should be further protected for the contribution it makes to wildlife due to its water quality;
- Watchwood, Calverton is an important site for nightjar;
- South of Charnwood Way is an important wildlife habitat;
- Requiring the incorporation of wildlife features such as bird boxes and the replacement of hedgerows into new developments; and

- Promoting the development of paths which give access from town and village centres to open spaces, the countryside, parks and other amenities.

Overall, Natural England recommended that Green Infrastructure and Nature Conservation Sites (Biodiversity and Geodiversity) are separated out as they are different types of environmental assets which require different policy approaches. They also recommended that the section on Nature Conservation sites be renamed to avoid confusion with Heritage Conservation.

## Landscape

There was a mixed response to questions related to our approach to locally valued landscapes.



Whilst there was more support for continuing our current approach, the majority of the comments related either to the need to protect Lambley and Woodborough and incorporate a more robust policy or support for the use of the Landscape Character Assessment (LCA).

Use of the LCA was supported by Langridge Homes (a house builder), Linby and Papplewick Parish Councils and Natural England who also identified the importance of the two National Character Areas covering the Borough. English Heritage also recommended that Historic Landscape Character should be incorporated into the policy. Langridge highlighted that the Mature Landscape Area designation is out of date and an approach is needed which provides more flexibility in urban fringe areas. The Parish Councils identified that the LCA was effective in addressing the need for development and the capacity of the area to accommodate change. While Nottinghamshire County Council did not make a clear recommendation either way, it was identified that use of the LCA will protect landscape areas and ensure consistency with county wide designations and policy. The NFU considered that any

approach should provide guidance on how development can be accommodated within landscapes but not prevent development on farms.

There was strong support for the intention to continue to protect ridgelines within the Borough. This was especially strong from the Lambley and Woodborough areas, where members of the public felt that development would have an adverse impact. Langridge Homes supported the intention to identify and protect ridgelines but considered that this should only be the 'primary' ridgelines and allow for development beyond the ridgelines.

## **Transport**

### **Cycling**

Nearly all respondents agreed that developer contributions should continue to be required for cycling and that cycle routes should continue to be protected.

The Highways Agency supported the emphasis on cycling; the need for contributions to cycle facilities and also the safeguarding of routes which they commented would help to reduce pressure on the strategic road network. Natural England also supported the encouragement of cycling, stating that it would help to reduce carbon and other harmful emissions. They added that cycle routes should be incorporated into green infrastructure wherever practical.

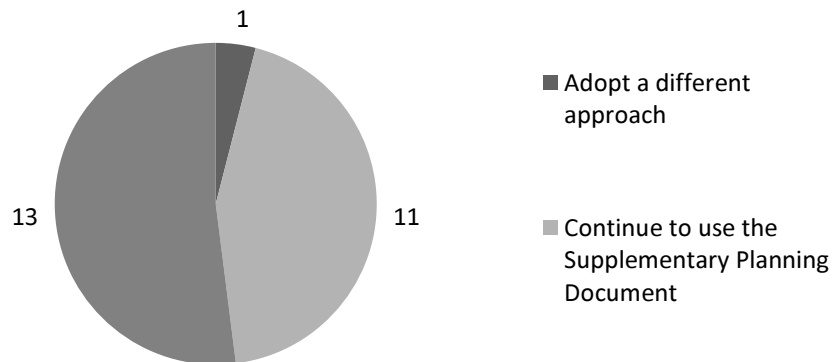
Other respondents' comments included:

- The need to segregate cyclists and pedestrians;
- Imposing speed limits on rural roads in order to encourage cycling;
- Reference should be made to Sustrans routes in the Borough;
- Developer contributions should only be required where a cycle route passes through new development and where there is an opportunity to connect it to an established route;
- Developers should make provision for cycling infrastructure within their development schemes as well as contributions to wider cycling provision;
- The existing shared footpath cycle route along the A612 between Burton Joyce and Carlton-Le-Willows is inadequate and uneven;
- There is a need for separate cycle routes from the edge of the Nottingham urban areas and the wider Greater Nottingham area to the City Centre; and
- Walking cycling routes should be provided to transport hubs in accessible locations with good access to bus services and dry cycle storage facilities (cites Holland as an example).

### **Residential Parking**

Nearly half of respondents supported the continuing use of the residential car parking standards set out in Gedling Borough's Supplementary Planning Document (SPD) on parking. Half of respondents were of the opinion that key elements of this SPD should be incorporated into the Local Planning Document.

## What approach should we take to residential parking?

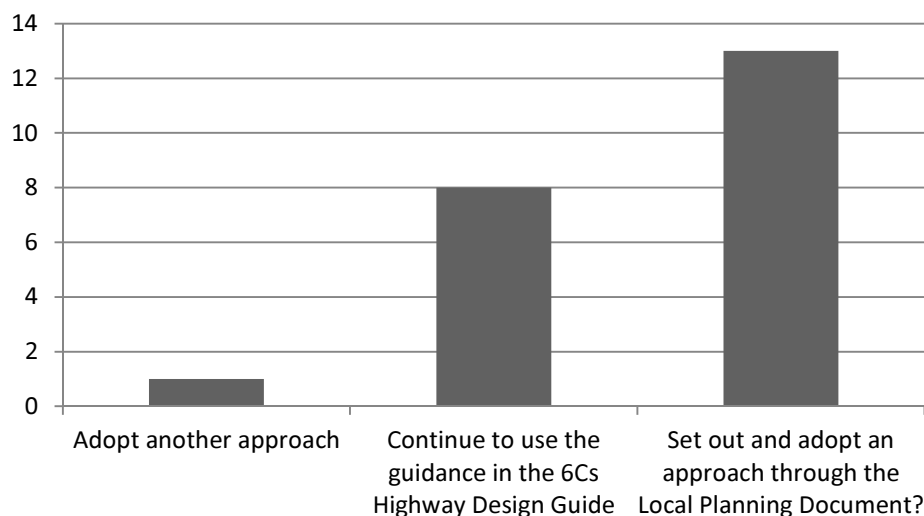


A number of Woodborough residents considered that the parking standards were too low and assumed a lower car ownership lower than was the case in Woodborough. A common view was that there should be at least 2 off road car parking spaces per house. Woodborough respondents also mentioned problems with narrow roads within the village and that, in some locations, on-road parking (for example Main Street close to the Post Office) was leading to problems and effectively creating a single carriageway. A general point made by Woodborough residents was that there was insufficient parking in the village to support more housing.

### Non-residential parking

Respondents were also asked about non-residential parking and whether the Council should continue to rely on the 6Cs design Guide; set out an approach through the Local Planning Document or adopt a different approach. This is shown below:

## Number respondents to use of the 6Cs Highways Design Guide



Most respondents favoured setting out an approach to non-residential parking through the Local Planning Document although a significant number opted for continuing with the 6C's Highways Design Guide. Nottingham City Council expressed support for the use of the residential Parking SPD and the 6C's Highway design Guide. The GBC Environmental Health Officer recommended that consideration be given to including provision encouraging the use of electric or hybrid vehicles through the SPD.

Other comments included:

- The need to include porous drives in new developments; and
- Insufficient protection was given to pedestrians and other non-car road users.

### **General Transport Policy**

Nearly 60% of respondents agreed that there was no need for additional local policy on transport required over and above the National Planning Policy Framework and policies 14 and 15 of the Aligned Core Strategy. However, 41% considered there should be additional local policy.

The Highways Agency does not consider that local policies are required as Aligned Core Strategy Policies 14 and 15 are sufficient. On the other hand Linby and Papplewick Parish Council are of the view that local policy is required because existing road network is struggling to cope at peak times as highlighted in their traffic surveys presented at the examination into the Aligned Core Strategy. Another respondent also supported a local policy that could reflect the nature and character of the area including the need to prevent HGV traffic through villages. Linby and Papplewick Parish Councils considered ACS Policy 15 to be misleading in that it states there is no committed funding for the GAR.

Other comments of a more general nature included:

- Rural bus services were generally poor especially in Woodborough;
- The need to address particular existing problems of traffic congestion with specific references to the A60 corridor at Redhill. It was suggested that a Park and Ride site should be located to the north of Nottingham; and
- Support for the free parking in Mapperley and Arnold shopping centres.

### **Transport Routes**

The overwhelming view was that future transport routes should continue to be identified and protected. Linby and Papplewick Parish Council referred to the consequences of losing former transport routes and that new routes should be actively sought and explored. Nottingham City Council also agreed with safeguarding routes subject to these having sufficient capacity. Nottinghamshire County Council referred to working with partners such as Sustrans and also to the work by Nottinghamshire County Council to identify a strategic programme of sustainable and off road routes which would be safeguarded.

A number of respondents referred to safeguarding the mineral line to the former Calverton Colliery and there was also mention of safeguarding the Gedling Colliery line for a cycle route.

**Other Transport Matters**

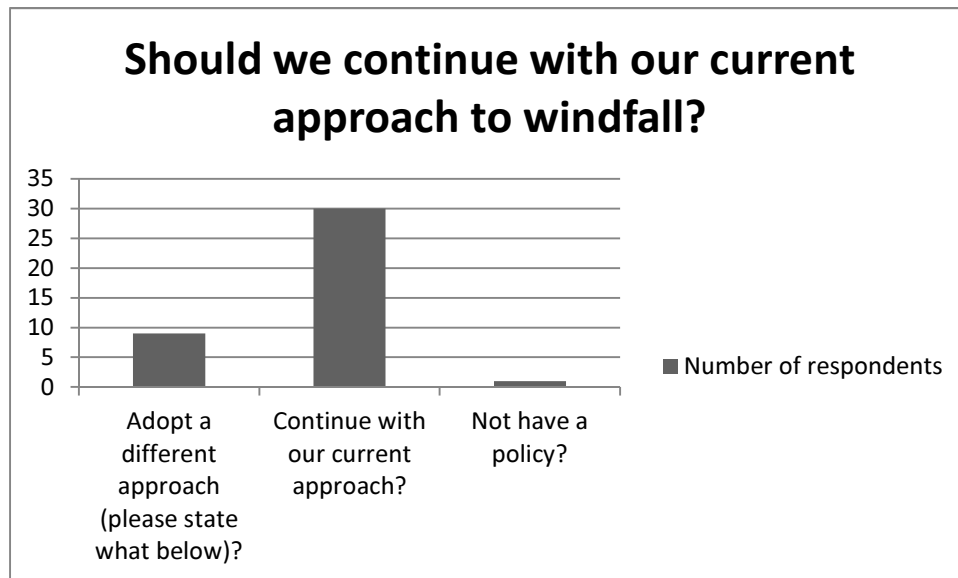
Burton Joyce Parish Council referred to the potential to release pressure on the road system if more trains stopped at local stations such as Burton Joyce.

Nottinghamshire Fire and Rescue Service stressed that all planning decisions must ensure that the needs of the emergency services to reach all areas of the community promptly is carried through.

Nottinghamshire County Council requested that the context plan in Appendix A of the Local Planning Document should include the NET lines.

## Approach

In response to questions about windfall, there was significant support for continuing with the current approach of permitting windfall sites within the urban area and village envelopes of inset villages subject to site specific issues.

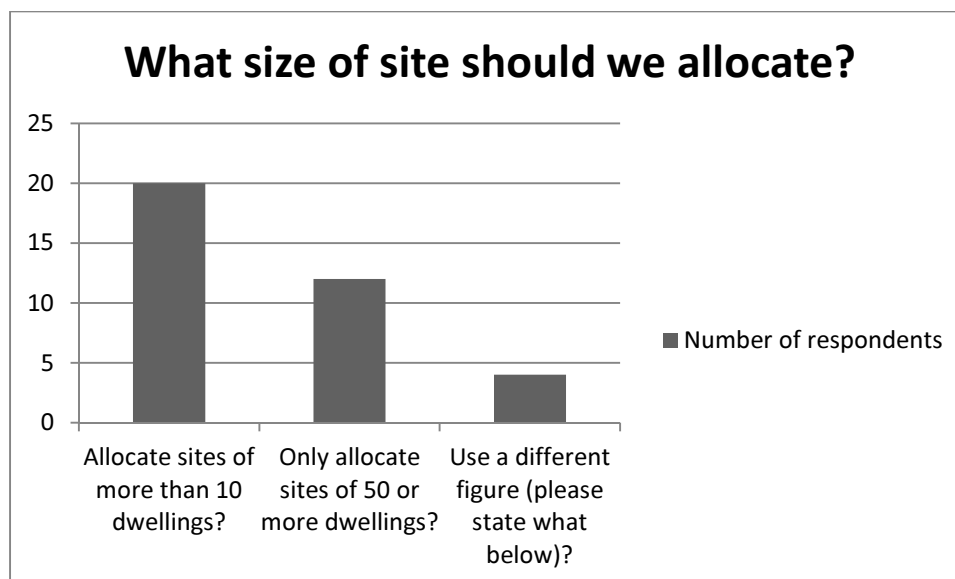


It was identified by English Heritage that the current approach recognises and protects local character; an important issue for a number of local residents. Others identified the importance of the design, materials used and the scale of infill development 'harmonising' with surrounding development and the need for planning officers to strongly defend the policy to avoid unacceptable development being granted on appeal. Those who wanted to adopt a different approach, especially local residents, were generally seeking to strengthen the policy highlighting concerns over green belt, design and the views of local residents.

Two respondents referred to the 'windfall allowance' proposed through the Aligned Core Strategy. Both supported the use of a windfall allowance but requested that this be based on historic data.

With regards to the size of site that should be allocated there was a mixed response, as shown in the following table.





Those in favour of allocating sites of 10 dwellings and above identified that the approach was consistent with current practice, provides certainty and allows a more detailed assessment of the impact. Others (both developers and residents) considered that allocating sites of 10 dwellings and above might be appropriate in the Key Settlements for Growth and other villages where smaller schemes are more likely and the impact proportionally greater. Linby and Papplewick Parish Councils identified that many sites of between 10 to 50 dwellings are likely to be available in the urban area; failure to allocate them would not accord with the strategy of urban concentration.

Those who objected to the use of 10 dwellings as the threshold for future allocations fell into two groups; those who supported the continuation of 50 dwellings as the threshold and those who wanted to allocate all sites including those of 1 or 2 dwellings. Two developers supporting the use of 50 dwellings considered that the allocation of sites did not really provide certainty that the site would come forward for development and allocating smaller sites introduced inflexibility. Allocating sites of 50 or more dwellings would ensure a sufficient supply of houses while allowing smaller sites to come forward as windfall. A small number of residents wanted all sites to be allocated to provide certainty that other sites would not come forward and to allow the impact to be fully assessed.

### Contributions

As part of the process of allowing development to go ahead there is a requirement that developers make contributions towards mitigating the impact that is caused by the development. The contributions provided are only to address the additional impact caused by the development and not to deal with pre-existing issues.

When negotiating for contributions it is often not possible to meet all the requests made by infrastructure providers or other groups and still have a deliverable development. Decisions need to be made about which contributions will be sought and which it might be necessary to drop. As part of the Issues & Options document views were sought on the priority that should be given to different types of

contributions. The list below ranks the categories identified in the question in order of average priority:

1. Drainage and flood protection
2. Open space
3. Health and social care facilities
4. Public transport
5. Education
6. Emergency facilities
7. Transport infrastructure
8. Environmental improvements
9. Green infrastructure
10. Information and communication technology
11. Community facilities
12. Waste recycling facilities
13. Shopping facilities
14. Training and employment measures for local people
15. Affordable housing
16. Travel behaviour change measure
17. Cultural facilities

Given the large number of responses regarding the village of Woodborough and the recent high profile of flooding in the national news it is unsurprising that 'drainage and flood protection' was ranked highly by respondents. The impact of development on open space, health facilities and schools are issues that are raised in many responses and it is also unsurprising that they were also seen as priority areas. The Borough Council's Scientific Officer identified the importance of public transport, travel behaviour change measures and environmental improvements in delivering the Air Quality Action Plan for the area designated along Mansfield Road (A60) in Daybrook. One developer objected to the question as in their view this is not the way in which S106 contributions will be used following the introduction of the Community Infrastructure Levy Regulations.

In terms of thresholds, 20 dwellings and 100sqm of floorspace were the most common identified. One developer considered that it was not appropriate to apply a trigger or standard mechanism as in these cases the Community Infrastructure Levy should be used. Similarly, the Environment Agency considered that this should be based on a site specific assessment.

The need for a plan wide viability assessment was identified by the Home Builders Federation and developers. This would ensure that the cumulative impact of policy requirements, both national and local, was not onerous and that development provided a competitive return and was ultimately deliverable. Use of the Local Housing Delivery Groups 'Viability Testing Local Plans' was recommended as a basis for the assessment. There was also a request that any policy include a provision that states that contributions will only be sought where the scheme is viable.

It is proposed to introduce a Community Infrastructure Levy (CIL) which would operate alongside the existing S106 mechanism for developer contributions. CIL is

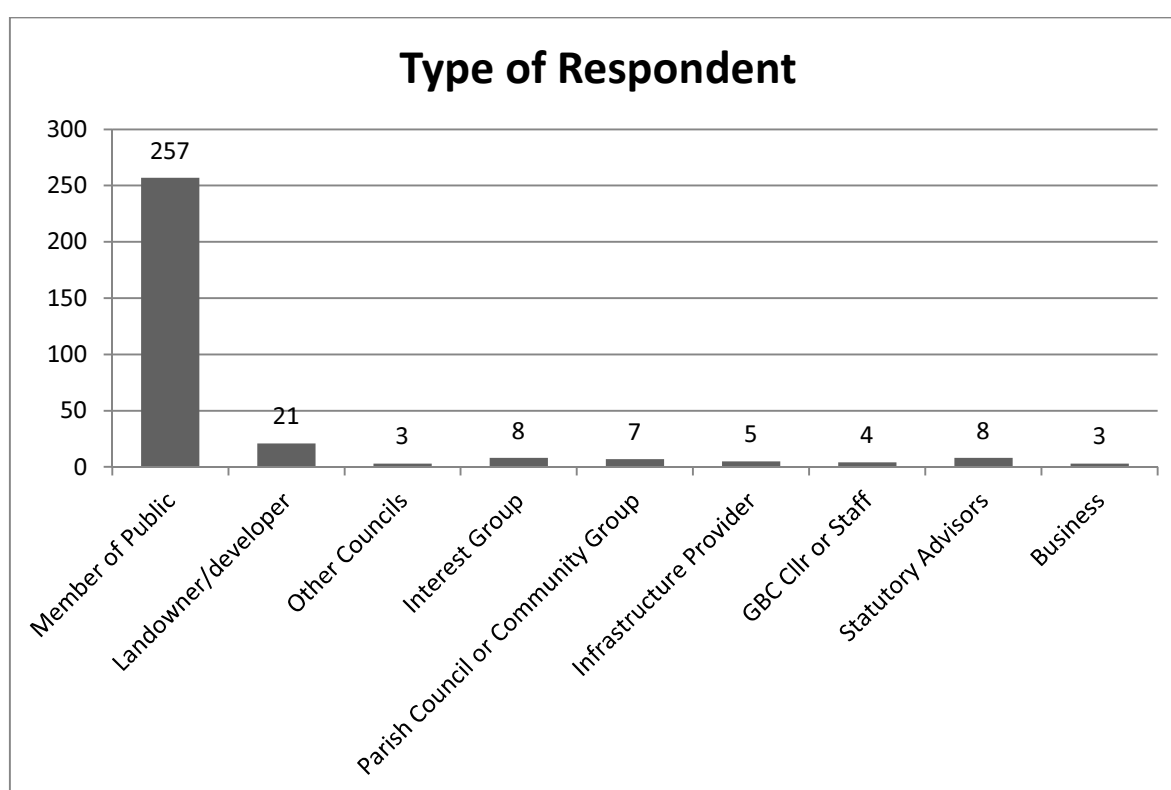
to be adopted via a separate process which involves public consultation and independent examination. One developer identified that the operation of S106 alongside the CIL would need to be carefully considered and appraised.

## Consultation

Alongside the questions related to the Local Planning Document itself, we also asked about how the consultation had been carried out to explore the experience of making comments and accessing the documents. This would allow us to identify how future consultations could be improved. While the questions related to the Local Planning Document we will use the results to inform all future consultation events.

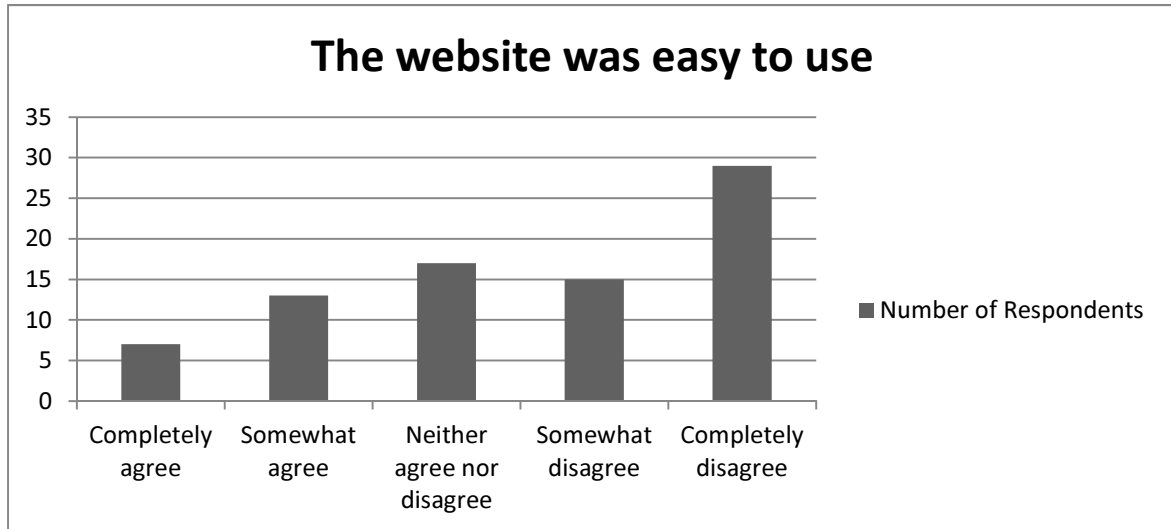
A small number of respondents raised concerns with the principle of the consultation itself. Some, including Linby and Papplewick Parish Councils, considered it premature in advance of the final report on the Aligned Core Strategy which would determine a number of key strategic matters. Others considered that the consultation did not meet the requirements of paragraphs 17 and 150 of the National Planning Policy Framework and that the Borough Council had “closed its mind on a number of issues”.

Overall, we received 316 responses. The chart below shows a breakdown of the type of respondent who made comments:

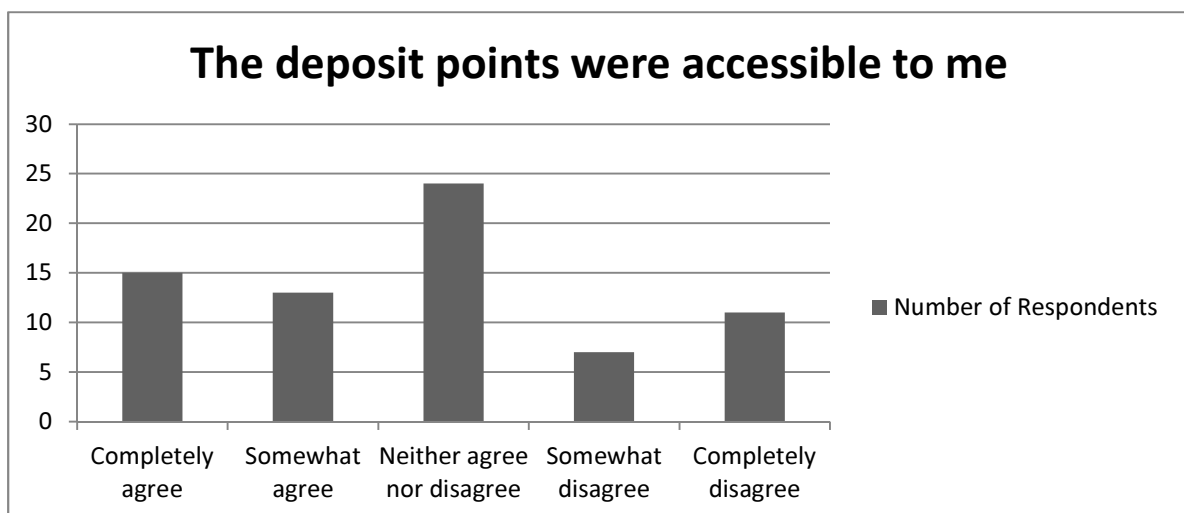


About 80 responses were made online, however, many respondents found the online system difficult to use and encountered a number of technical difficulties when trying to submit their comments. Common issues identified included:

- online text too small to read;
- unable to save part of form; and
- the system was slow or froze.



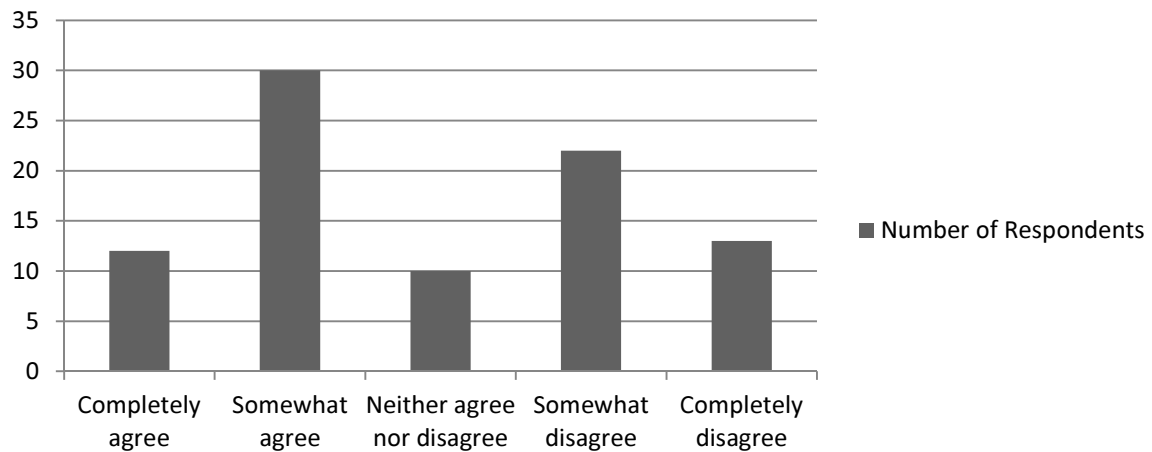
While those who responded via the online system were more likely to agree that it was completely or somewhat easy to use. It is clear that further work will be needed to make the online more user-friendly.



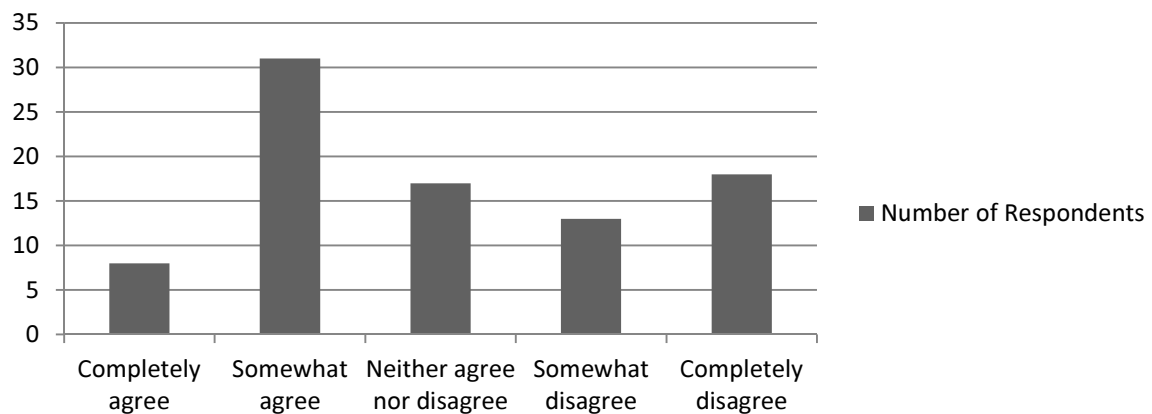
Those who responded to this question generally agreed that the deposit points were accessible, although the difference was small and improvements could be made. A number of respondents identified that they did not understand the term 'deposit point' and this will be explained more clearly in future consultations events.

In terms of the content of the Issues & Options document itself and the questions we asked, respondents were generally satisfied with our approach although there was a sizeable group who identified a number of issues.

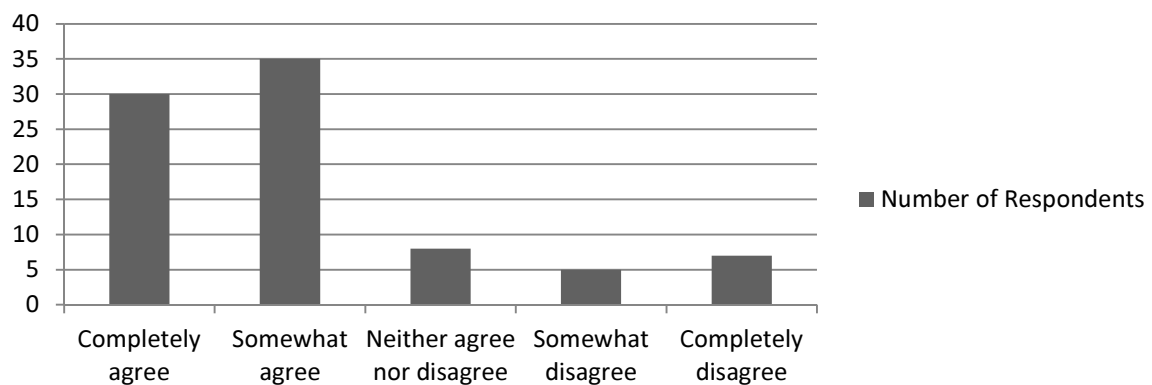
### The questions were easy to understand



### The background to the document was well explained



### The maps were clear



The maps used in the Local Planning Document were overwhelmingly considered to be clear. One respondent requested that the scale of the map be included to remove any possibility for confusion when comparing maps of a different scale, while another requested inclusion of a contour map. The majority of those responding agreed that the questions were understandable and the background to the document was well explained. There was, however, a sizeable group who disagreed (40% and 36%). This is perhaps linked to the recommendation to use 'plain English' which was made by a number of respondents. This involves avoiding the use of technical planning jargon and using a 'plain' style of writing. It was also recommended that a non-planner 'road test' the document prior to making it public.

A related issue was the length and complexity of the document. A number of respondents, including residents, Parish Councils and developers, identified that the size of the document may have been off-putting for members of the public due to the time and patience required to complete the form. There were also concerns about the level of knowledge required, and the need to read and digest other documents in order to make a response.

Linked to this and the use of plain English, there were a number of respondents who considered that insufficient guidance had been given regarding how to complete the form. Specifically, it was identified that it had not been made clear that not every question on the form had to be answered which may have discouraged members of the public from making a response.

Advertising the consultation event was also an area where a small number of residents raised issues. One common issue was that Woodborough Parish Council had been given insufficient notice of the consultation as they had not been advised until early September 2013. Access to the document was also identified by respondents who considered that web links should be more prominent and that there should be wider publicity including notifications sent to properties adjoining proposed development sites. There was also a request that more time be given for responses to be submitted.

## Other issues

A number of other issues were raised, many of them outside the scope of the Local Planning Document. Nottinghamshire County Council, Nottingham City Council and The Coal Authority made comments related to minerals and waste issues. The County Council identified their role as statutory Waste Planning Authority and the need to ensure a supply of employment sites appropriate to accommodate waste management facilities. In relation to minerals, Nottingham City Council recommended that policies be included regarding 'on shore oil and gas extraction'. The County Council highlighted that Local Plans are required to include policies on minerals safeguarding and consultation areas. The extent of these has been provided and a reference to them should be included in the Local Planning Document. Ibstock Brick Ltd highlighted that mineral safeguarding is essential for their business.

The Coal Authority's role is to deal with the legacy of the coal mining industry in the UK. They have identified that there a number of mining features, generally in the Ravenshead area and at Gedling Colliery, and that new development should recognise the problems and how they can be positively addressed. They go on to note that land instability and mining legacy is not a complete constraint on new development but addressing it ensures that development is safe, stable and sustainable. Written permission from the Coal Authority may be required.

Two of the other issues raised that relate to the ACS, are the need for a 'brownfield first' policy and a greater degree of urban concentration. A number of residents and Calverton and Woodborough Parish Councils considered that the Local Planning Document should include a policy which ensures that previously developed brownfield sites are developed prior to greenfield sites being lost. Linked to this, a smaller number of respondents (including both Calverton and Woodborough Parish Councils) felt that more sites were available in the urban area than had been allowed for in the ACS. These sites should be prioritised in order to comply with the strategy of urban concentration meaning sites in the rural areas are not required for development. Specific sites or sources of additional dwellings mentioned included:

- Gedling Colliery – 1000 dwellings;
- Teal Close, Netherfield – 350 dwellings;
- Windfall between 2016 and 2023 – 280 dwellings;
- Increased density on SHLAA sites – 270 dwellings; and
- Increased capacity of SHLAA sites (including employment sites) – 650 dwellings.

There were also comments regarding the scale of development around Hucknall and the proposals to allocate the sites of North of Papplewick Lane and Top Wighay Farm. These generally came from residents and Linby and Papplewick Parish Councils who were concerned over a range of issues including impact on infrastructure, increases in traffic and the use of greenfield sites.