

REPORT OF RESPONSES			
From	Comment	Response	Action
Guy Taylor Associates	The design code will not keep pace with the various changes in the policy context over the coming years.	The design code establishes the general framework for planning applications and provides guidance on what constitutes good design in Gedling Borough.	No change.
	Small Sites The coding used in the checklists is not applied to the code documents making them difficult to reference within submissions.	Agree. Use the letter coding (already used in checklists) in the standalone documents, as well.	Standalone documents amended to benefit from the letter coding system used in the checklists.
	Although the code suggests there must be a distinctive character which must be reflected, the examples (C1 / Figure 2 and 3) are reflective of the reality that there is rarely an overriding and predominant singular pattern of development or indicate areas of departure from an overriding character	Recognise that there may be a variety of patterns of development. Applicants should demonstrate an understanding of the patterns and explain how they have informed the development proposal. For sites where the immediate surroundings are dominated by generic or mixed designs, proposals must consider the wider context making use of the Observation Library, as stated in the code documents.	No change.
	Erroneous duplicate visual (Figure 3) on page 8 C2 - Characterful Homes (c).	Amend visual (Figure 3) on page 8 (Extensions/Alterations document) to provide a good and poor example to changes in height with neighbouring properties.	Visual amended.
	Concerns that current design criteria and space standards can be difficult to apply to local architectural forms and examples.	Disagree that it would be too onerous to apply current design criteria and space standards to local architectural forms and examples.	No change.
	Conflicts in terms of the housing needs assessment (i.e. bungalows required in an area with a prevalence of terraced houses).	Noted.	No change.
	Figures 10 and 11 (in Small Sites) are contradictory.	Amend Figures 10 and 11 (Small Sites) to clarify good and poor examples.	Visual amended.
	Set back distances might need to be reduced, otherwise new designs will be contrary to the pattern of development in the area.	The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.	No change.
	Little discussion on public open space, play space or any other open space.	G8 Open Space (Major Sites) cover open space and relevant features. Separate guidance on open space provision is provided in the Borough Council's Open Space SPD which will be updated in due course.	No change.
	No reference to tree-lined streets.	C+H4 Street Design (Major Sites) address streets, landscaping and biodiversity features.	No change.
Nothing on the need to break up on street parking.	C+H4 Street Design and C+H6 Parking (Major Sites) address streets and parking, and relevant issues to design of residential buildings. Parking requirements are covered by the Council's Parking SPD.	No change.	

	<p>Nothing on bins or collection areas.</p> <p>No guidance on heritage, conservation areas or designated areas and how these specific contexts should be addressed. The requirements will differ when considering heritage based projects and conservation areas. Need consideration of heritage, culture asserts, key views, vistas, designated parks.</p> <p>Very little information about transportation and hierarchy of streets, shared surfacing, pavements, street furniture etc. and how cyclists, pedestrians and vehicles are to operate within a character area.</p> <p>Little discussion about innovative design, exemplar projects or exceeding the bar. Exceptional quality, high standards in architecture and raising design standards are some notions supported by the NPPF and should be referred to in the design code.</p> <p>It is mute on the idea of the chronology and legibility of the gradual expansion of a place where each development is reflective of the time in which it was created and adding to the story of a settlement.</p> <p>New intervention may need to be of its own character rather than mimicking the edges of the site which may be of low or poor design quality. Concerned about homogenisation and the notion that a development may be forced to reflect a very poor neighbouring development</p> <p>The document does not encourage the notions of chronology and legibility when considering what is perceived to be good design. There should be an opportunity for design evolution. Almost all of the most characterful areas and heritage assets within the area are an amalgamation of various periods and phases of development each with a distinct style adding to the chronology and legibility of the area.</p> <p>Extensions and Alterations Extensions and alterations which can be made under permitted development without following the guidance should be taken into account. A section for best practice on the PD rights would be of assistance. Requirements shown in diagrams, i.e. side extension, are more stringent than the PD rights.</p> <p>The diagrams and suggestions in C2 Characterful Homes do not really</p>	<p>C+H7 Waste Storage and Collection (Major Sites) contain relevant information.</p> <p>Guidance on heritage, conservation areas and designated areas is provided by separate planning policy guidance and national legislation. The Design Code focuses specifically on design matters.</p> <p>C+H1 20-Minute Neighbourhoods, C+H4 Street Design, C+H5 Cycle Parking and C+H6 Parking (Major Sites) address mentioned issues.</p> <p>It is not the intention of the Design Code to prevent high quality design from being delivered. Additional text to be added to confirm.</p> <p>The Core Document, coding plan and Observation Library provide extensive narratives on the topics mentioned.</p> <p>The Design Code clarifies under C1 and C2 that if the surround context is generic in character, then applicants should look more widely to inspire a locally distinctive response.</p> <p>In terms of eclecticism, historic settlements have various design examples that incorporate elements of traditional styles, ornaments or structural features that originated from different periods. However, adding a new element, i.e. a contemporary building, should be carefully managed. The design code does not necessarily preclude contemporary designs as long as they demonstrate how they considered features that contribute to the character of the local area and do not have a negative impact.</p> <p>The opportunity will be taken through the adoption of the Design Code to raise the profile of design in the borough. This can include use of the Design Code to explain the principles of good design, even where applications for planning permission are not needed.</p> <p>The requirements are for extensions to <u>contribute</u> to the <u>existing</u></p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>The following statement has been added to the Introduction section: <i>“[The Gedling Design Code Framework] encourages exemplar and innovative designs that align with the Framework Principles.”</i></p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>represent developments that would be assessed as being 'characterful'. They are more akin to the notion of 'in-keeping' rather than characterful, to achieve 'characterful' will require a departure from the surrounding developments to create interesting and unique. There is a tendency to homogenise an area rather than make it characterful and result in the erosion of existing characterful areas.</p> <p>The issue of subservience is not confined to a simple 'scale and form' assessment, there are other ways of achieving subservience even for an extension which is larger than the host dwelling.</p> <p>Artificial grass is a permeable surface which can be installed under PD in most instances.</p> <p>G1 – Topography discusses the use of a broad range of materials for retaining structures, including gabion walls. Where an external wall of an extension forms a retaining structure, alien materials can be introduced which would contradict earlier requirements in C4.</p> <p>Requires information on removal of trees/vegetation and offsetting/replacement of important green features.</p> <p>There is no mention of frontage additions or the complete renovation of an elevation.</p> <p>Suggest using the term 'variety'</p> <p>No discussion around:</p> <ul style="list-style-type: none"> the reduction in parking or drive areas arising from extensions pressure to over-pave frontages to generate additional parking and 	<p>character of the local area and avoid any design features that erode their character by 'reflecting the existing pattern, sizes and proportions of architectural features', 'reflecting existing patterns of spacings', 'being subservient to the scale and form of the original dwelling', 'adopting the same types of roof forms and match existing roof pitches of the main building' and 'demonstrating that extensions are sympathetic to the main property and its neighbours'.</p> <p>The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>Noted. However, the reference to avoiding use of artificial grass is included in accordance with the aim of the code to establish good design principles and support biodiversity and ecology within the Borough.</p> <p>Gabion wall is not a 'material'; gabion is a cage or box filled with various materials, i.e. stones, concrete or sand and soil, which may or may not reflect local character depending on the material used for filling. G1 Topography (d) reads "...use <u>appropriate materials</u> such as timber, gabion walls or brick terracing integrated with landscaping to create attractive retaining structures...".</p> <p>Disagree. This is outside scope of the Design Code.</p> <p>The Design Code looks to provide guidance on the more common forms of development. The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>Agree. Add reference to 'variety' under C2 Characterful Homes in the Major Sites and Small Sites documents.</p> <p>Parking requirement is covered by the Council's Parking SPD and County Council's Highway Design Guide.</p> <p>It is accepted that only paving areas greater than 5 sqm require planning permission. The design code</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>C2(f) Major Sites and (d) Small Sites amended to read "<i>design proposals must ensure that architectural features such as canopies, porches, bay windows, gables, brick detailing, eaves, window and door styles, and roof forms and pitches reflect the character of the local <u>area and create variety and interest.</u></i>"</p> <p>No change.</p> <p>No change.</p>
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	<p>examples achieved using permeable paving (permissible under permitted development)</p> <ul style="list-style-type: none"> the desirability to provide off-street parking and the ability to charge electric vehicles garaging and the provision of sufficient storage, bins, bicycles etc. flood resilience and measures that should be included within flood areas 	<p>establishes good design principles whether or not planning permission is required.</p> <p>G5 Low Carbon Homes includes a requirement to provide electric vehicle charging for off-street parking.</p> <p>C+H5 Cycle Parking and C+H7 Waste Storage and Collection (Major Sites) address mentioned issues. Additionally, the Council's Parking SPD provides relevant information.</p> <p>Flooding falls outside scope of the Design Code. However, G6 Water briefly addresses flood mitigation. It is the role of Lead Local Flood Authority (LLFA) to manage and co-ordinate local flood risk management.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
Aldergate Properties	Can't appreciate the "step change".	Noted.	No change.
National Highways	No comments.	Noted.	No change.
Flood Risk Management / Nottinghamshire County Council	<p>Although the Major and Small Sites document mentions SUDS, the need for above ground SUDS to be considered.</p> <p>Nature-based solutions are supported by the LLFA (Lead Local Flood Authority).</p> <p>Figure 18 in the Major Sites document is unclear to the reader and may need explanation.</p> <p>Gedling has exemplary SuDS features. The Chase Farm Development SuDS features could be used (p. 34) to highlight the wider benefits.</p>	<p>G2, G6, G8 and C+H4 are referring to SuDS and their benefits.</p> <p>Noted.</p> <p>Figure 18 is intended to demonstrate the wide range of opportunities for managing surface water flooding, rather than setting detailed requirements.</p> <p>Amend visual on page 34 to include a suitable SuDS example.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Visual amended.</p>
Natural England	<p>Welcome the inclusion of advice on Green Infrastructure and Biodiversity Net Gain.</p> <p>Design Codes should include the five headline Green Infrastructure Standards.</p> <p>Green Infrastructure Planning and Design Guide provides details of what good Green Infrastructure design looks like linked to NMDC's ten characteristics of well-designed places.</p>	<p>Noted.</p> <p>Gedling Design Code aims to define good design principles for residential buildings and setting out the detailed requirements as set out in the Green Infrastructure Standards would go outside the scope of the Design Code.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p> <p>The desirable requirement under G7 Biodiversity and Ecology amended to read "<i>design proposals should consider additional features that can support biodiversity and ecology such as <u>rain gardens</u>, <u>green roofs/walls</u>, <u>swift bricks</u>...</i>". The Extensions and Alterations document only includes reference to <u>green roofs/walls</u> to match scope of the document.</p>

Councillor	<p>The documents are easy to read, follow and adhere to with design principles and explanations behind.</p> <p>The section relating to Ravenshead makes it particularly clear that large plots in a green setting with low density housing, should be adhered to.</p>	<p>Noted.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p>
The Coal Authority	No comments.	Noted.	No change.
Gedling Climate Change Group	<p>We are very positive about the proposals outlined. We support that the agreed Framework will apply equally across its three documents, i.e. a mandatory provision in one document will be mandatory in all three.</p> <p>Core Document (p.19) Greener Gedling supportive of the principles set out in particular the key aims. It would be sensible to insist that all new developments make the fullest use possible of the latest technologies even for extensions/alterations.</p>	<p>Noted. However, there are instances where a mandatory requirement for large sites (such as open space provision) may not be mandatory for small sites/extensions.</p> <p>Agree. Place content from G5 Low Carbon Homes into the Extensions and Alterations document with some minor changes to text to be relevant to the site size.</p>	<p>No change.</p> <p>Extensions and Alterations document updated to include G5 Low Carbon Homes.</p>
Ashfield District Council / Forward Plans	No comments.	Noted.	No change.
Persimmon Homes	<ul style="list-style-type: none"> Development Patterns <p>Replicating the older typologies of development patterns (i.e. colliery villages, tofts) is not achievable in most cases. The highways authority are reluctant to adopt anything apart from standard designs, so they may not accept/adopt these designs. Some street typologies were devised long before cars were the predominant form of transport and therefore not suitable to modern housing developments and standards.</p> <p>Lower density housing is more expensive especially in locations which comprise larger property types. It could have significant implications for creating balanced communities, pricing residents out of these areas for good, by guarding against increased density development. This is likely to be used by objectors in these neighbourhoods to justify the refusal of otherwise acceptable schemes.</p> <p>To require developments to start drawing distinctive development patterns based on old, and now outdated, typologies could mean very little getting built in Gedling.</p> Characterful Homes <p>The requirement to add a myriad of architectural features to properties is going to make some sites unviable, pushing up build costs significantly.</p> 	<p>Although replicating older typologies of development patterns may not always be achievable, consideration should be given to how to reflect elements of historic patterns. The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>The design code does not propose a lower density. C3 Densities reads “<i>design proposals must demonstrate how they will make the most efficient use of land with regard to Policy LPD33</i>” and “<i>consider the role that dwelling types may have in promoting higher densities without having an impact on existing development patterns</i>”.</p> <p>The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>The Design Code requires new development to demonstrate how they reference the design details of</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

	<p>The document 'Review of Design Code Principles against Potential Impact on Viability' makes no substantive quantitative appraisal of the development costs. A significantly increased build cost for developments could result in viability arguments being put forward to reduce other infrastructure obligations.</p> <p>The policy seeks to ensure patterns of setbacks, plot depths are consistent with existing Homes which can have significant implications for housing numbers achievable on a site.</p> <ul style="list-style-type: none"> • Densities The Local Plan Policy LPD33 already covers housing density to make efficient use of land. This policy does not add anything to the existing. Caution needs to be heeded, as detailed above, to avoid an overly restrictive approach to densities that would not allow more homes to be built in the right place. • Boundaries and Thresholds This component has implications in terms of increased material costs such as requesting stone walls across developments which is unlikely to be viable for many schemes. Perhaps additional wording within the component to acknowledge a balanced approach to approval of boundary treatments would be merited. • Materials Onerous material requests can have significant implications for viability. For example, requesting limestone roof tiles and walls across major developments is not going to be realistic, or viable. Examples are given of distinctive surface material in the form of Staffordshire blue diamond pavers and using Linby Limestone. The Highways Authority are not going to adopt these types of different surfaces. • Greener Gedling In terms of the micro-climate component acknowledgment must be given to the fact that sometimes a site's constraint makes it impossible to develop in a way that would maximise solar gain for example. <p>The green infrastructure and interfaces components add very little to the code. Gedling already has a strategy on this.</p> <p>The Low Carbon Homes component of the Design Code may not be legally compliant. The Written Ministerial Statement (December 2023) states that 'the Government does not expect plan-makers to set local energy efficiency standards for</p>	<p>characterful housing, including architectural features.</p> <p>Depending on the location of the development site, the number of dwellings achievable may be higher or lower. Reflecting the character of the local area will need to be balanced against compliance with the separation distances etc.</p> <p>The approach taken by the design code is consistent with Local Planning Document Policy LPD 33.</p> <p>The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>C5 Materials does not require any particular material to be used in any specific part of the building. The code requirement reads "<i>use locally distinctive materials where relevant and appropriate</i>" and "<i>draw colour, finish and detailing from the surrounding context</i>".</p> <p>The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>The Design Code sets the general requirements for good design and should be read in conjunction with other planning policy documents.</p> <p>The wording of the mandatory requirements is not overly prescriptive, and it is considered that compliance can be demonstrated without impacting significantly on viability.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.’ Therefore, any attempt at exceeding building regulations through the design code is going against government guidelines.</p> <p>Below mandatory requirements are simply ill thought out and unrealistic:</p> <ul style="list-style-type: none"> * Locally sourced materials: What happens if the required material is not available locally? * Permeable surfaces: If the underlying ground conditions do not allow for permeable drainage, then the water would just sit there. * Integrate renewable technologies: Potentially in convention of government guidance on the matter if above building regulations. <p>Increased carbon technology requirements need to be robustly viability tested. The viability report accompanying document does not provide any sort of detailed analysis.</p> <p>The Biodiversity and Ecology section adds very little to the document given this is now mandatory and Gedling have their own detailed net-gain section.</p> <p>The Open Space section seems to not give any consideration to maintenance and how that is going to be achieved.</p> <p>The integration of SuDS features to create multifunctional spaces is not going to always be achievable. These features often need to be adopted, perhaps by a statutory undertaker such as Severn Trent, this could make the requirement unachievable. Also, technical constraints may prohibit these from being multifunctional.</p> <p>What is the point in providing a pinfold on a new development? Surely its more important to provide play equipment and things that people want to use. This would simply add a cost to a developer for very little benefit that could be spent elsewhere.</p>	<p>The design code aims to ensure new development is in-keeping with the range of materials found in the local area. The code requires proposals to “<i>use locally sourced materials where relevant and appropriate</i>”. The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>Integrating renewable or lower carbon technologies for heat and power such as photovoltaics and heat pumps was not considered to affect viability.</p> <p>The mandatory requirements are broadly supported by plan wide viability work prepared for the Greater Nottingham Strategic Plan, and are not overly prescriptive. Compliance can be demonstrated without impacting significantly on viability.</p> <p>Noted, but it is important to consider the interrelationship between biodiversity and design.</p> <p>Provision requirements and maintenance are covered by existing supplementary planning guidance which will be updated in due course.</p> <p>The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>Update G8 (d) to read: “<i>provide a variety of open space types that reflect historic forms, for example Pinfolds in the Historic Villages</i>”.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Text amended.</p>
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	<ul style="list-style-type: none"> Connected and Healthy Gedling 20-Minute Neighbourhoods do not currently appear in local planning policy. Have all site allocations been assessed to make sure they meet the requirements? What happens if they do not. Sites are assessed for suitability and sustainability through the Local Plan process. Introducing this 20-minute neighbourhoods through a Design Code is not appropriate. It should be through a Local Plan with proper scrutiny. Legibility Needs to be acknowledged that land ownership can often pose an issue with providing connectivity onto neighbouring developments. Liveable Homes Requirement to “create plot ratios and retain outdoor amenity areas that reflect the local area character” does not give any clear guidance on garden sizes. It’s not acceptable to say 21m back-to-back distance should be increased with additional upper floors. Does this extend to rooms, in the roof space? What is an acceptable distance? This is not clear. The requirement that any windows on gable end walls must be to non-habitable rooms does not make any sense if it’s a corner plot. This section is largely more relevant to householder extensions and not larger developments. Street Design This section gives a more reasonable approach that street design must meet technical standards, and it must be acknowledged in the document the older street patterns are not going to be easily replicated with the Nottinghamshire Highways Authority standards. Cycle Parking It would be good to give an indication on size of the stores. What volume provision is required per dwelling type? It is unrealistic to think on modern large developments that developers are going to build replica coal stores to house bikes. These would be an unnecessary expense, that adds very little to the character and appearance of the development. 	<p>The 20-minute neighbourhood approach is included in the emerging Greater Nottingham Strategic Plan. However, whilst reference is made to 20-minute neighbourhoods in the design code, the mandatory requirements look to maximise accessibility and are consistent with the principles of sustainability embodied in existing planning policy.</p> <p>The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>The requirement to reflect local area character and also accord with the plot ratios provide guidance on garden sizes.</p> <p>Design proposals must achieve a minimum back-to-back distance of 21 metres between homes up to two-storeys. Proposals higher than this should be decided on a case-by-case basis.</p> <p>Agree. Add a caveat.</p> <p>Although replicating older typologies of development patterns may not always be achievable, consideration should be given to how to reflect elements of historic patterns. Additionally, mandatory code requirements set out “<i>street design must meet technical highway standards if they are to be adopted</i>”, and “<i>applicants must liaise with Nottinghamshire County Council’s Highways to ensure that proposed streets meet adoption standards at the earliest stage in the design process</i>”.</p> <p>Relevant guidance is available in Parking SPD and Highway Design Guide.</p> <p>The Design Code does not require design proposals to build replica coal stores. The code includes non-mandatory guidance which suggests taking inspiration from historic forms of storage provision such as coal stores.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>C+H3 Liveable Homes (f) of all three code documents amended.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<ul style="list-style-type: none"> • Parking The component on parking does little to expand on the Councils standards for parking provision, which are clear. Perhaps more examples from approvals in Gedling that developers could use would be helpful. • Waste Storage & Collection Streets must accommodate refuse vehicles. The Highways Authority request that vehicles are tracked at 11.6m, therefore many of the street typologies required by the code are simply not going to work in practical terms. • General The design code is going to add significant workload and costs to developers devising big schemes, requiring more resources for Gedling BC to review. <p>The amount of Design Code components could and should be significantly shortened, i.e. biodiversity/green infrastructure is replicating other guidance documents and not adding anything to the outcome of developments.</p> <p>The Design Process flowchart is overly complex and should be simplified.</p>	<p>The design code aims to address parking issues from a design perspective and refers to Parking SPD and the County Council's Highway Design Guide for technical details.</p> <p>The design code sets out design proposals must give consideration to how to reflect elements of historic patterns with due regard to technical highway standards.</p> <p>During the preparation of the Design Code, careful consideration has been given to the approach taken to ensure the Code to support discussions around design as part of the planning application process.</p> <p>Noted, but it is important to consider interrelationship between biodiversity/green infrastructure and design. The design code framework is structured into three separate documents based on site size, each of which include only those principles that are applicable to that site size. The purpose was to make it a practical tool for extension/alteration and small sites applications (84% of all applications within the last 5 years) which often come from people without technical knowledge.</p> <p>Agree, but the flowchart needs to cover the pre-application process for those that chose to engage with it, as well as the planning application process.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
Ravenshead Parish Council	<p>The documents are well-written, easy to navigate and understand which should be easy to follow and adhere to for applicants with the clear reasoning of the design principles.</p> <p>It is clear that large plots with low density housing in a green setting, should be adhered to in Ravenshead.</p>	<p>Noted.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p>
Historic England	<p>Core Document (p. 4) Context: additional information would be useful on:</p> <ul style="list-style-type: none"> * how earlier characterisation work has been utilised in the Code. * What documents have been referred to? * Have Conservation Area Appraisals and Management Plans been used to inform the assessment, for example. 	<p>The previous urban characterisation work, undertaken by GBC during the late 1990s was a starting point for identifying areas of similar characteristics in the urban area and in the rural settlements. This work includes a Village Character Assessment, Urban Character Assessment and Urban Capacity Study fieldwork. Can we make Stage 1: Baseline Assessment Report available as a background document – some useful information on these points available in the document.</p>	<p>No change.</p>

	<p>Has the document considered how it can address any heritage at risk in the identified areas?</p> <p>Core Document (p. 13): additional detail is required setting out what the local character is, how developers can respond to the local distinctiveness of an area, what are the key issues to consider for historic villages and how does this relate to the need to protect the significance of heritage assets and their setting? We support any opportunity for the retention and enhancement of the historic environment.</p> <p>Core Document (p. 15) - the principles would benefit from having one relating to the historic environment.</p> <p>Core Document (p. 17) - We welcome the detail included and consider this could be expanded upon in the document.</p> <p>Core Document (p. 19) - heritage could be interwoven into the discussion areas including green and blue infrastructure, responding to climate change and renewable energy generation.</p> <p>Core Document (p. 25) Urban Area, settlement vision – how is this going to ensure the protection of historic environment and the significance of heritage assets and their setting? It would be further beneficial if the code cited specific documents, i.e. Conservation Area Appraisals and Management Plans, Historic Townscape/Landscape Characterisation, heritage asset list descriptions and statements of significance, local plan evidence base such as Heritage Impact Assessment</p> <p>Core Document (p. 29) – should include the need to protect and enhance heritage assets, including their setting, within the vision to clarify why the wider village is important to protect and to ensure new development needs to be sensitive to its historic context.</p> <p>Core Document (p. 30) – would be useful to include a reference to building heights.</p> <p>We support the reference to the Former Colliery villages and Conservation Area. We consider</p>	<p>This is outside the scope of the Design Code.</p> <p>This is outside the scope of the Design Code, which should be referred to alongside Conservation Area Appraisals and the local plan. However, Settlement Visions and Placemaking Strategies outline the heritage and growth of the settlement, as well as identifying key design features and considerations for the need to protect and enhance their character and setting. The Observation Library provides useful examples from the Borough. G3 (c) prevents development that precludes views of designated heritage assets.</p> <p>The design code provides guidance on design matters only. Historic environment is covered by Conservation Area Appraisals, local plan policies and national legislation.</p> <p>Characterful Gedling vision (p. 17) and relevant placemaking strategies is expanded upon in the various sections (principles C1 to C5) of the design code.</p> <p>The Design Code provides guidance on design matters only. Conservation Area Appraisals and local plans should be read in conjunction for heritage and conservation. The website will clarify that the Design Code should not be read in isolation.</p> <p>The Design Code provides guidance on design matters only. The website will clarify that the Design Code should not be read in isolation.</p> <p>The Design Code provides guidance on design matters only. The website will clarify that the Design Code should not be read in isolation.</p> <p>Code principles (C2, C3 and C+H3) include mandatory requirements in relation to appropriate height to be in keeping with the area.</p> <p>The Design Code provides guidance on design matters only. The website</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>additional detail from the CA Appraisal and Management Plan could be listed (i.e. under the key actions sections) to provide developers with key issues.</p> <p>Core Document (p. 39) – we welcome the useful reference to the National Character Areas. Would be beneficial to refer to heritage landscapes and the need to be sympathetic to them. Also, the interrelationship between heritage assets, long distance views, topography, building height, landmark assets will all be important considerations.</p> <p>Are there any opportunities to seek enhancement measures for the historic environment in areas such as infrastructure, street lighting, street furniture, public realm works as examples?</p>	<p>will clarify that the Design Code should not be read in isolation.</p> <p>G3 (c) prevents development that precludes views of designated heritage assets. The design code should be read in conjunction with Conservation Area Appraisals in order not to duplicate information already covered by existing policy documents.</p> <p>The design code should be read in conjunction with Conservation Area Appraisals in order not to duplicate information already covered by existing policy documents.</p>	<p>No change.</p> <p>No change.</p>
Linby Parish Council	<p>Design Codes are fairly generalised, given the varied character of the borough. However, we note that the documents all relate specially to residential development. The design of commercial and other kinds of development is clearly also important.</p> <p>Core Document We support the intention that the codes seek to protect the rural character of Linby. The document acknowledges that the Top Wighay strategic site allocation should not detract from the character or identity of Linby.</p> <p>The process flow diagram could be simplified. Design review is included with mention of two specific providers. This should be amended to make clear that there are numerous design review providers.</p> <p>Page 21: We suggest replacing references to '20-minute neighbourhoods' with 'walkable neighbourhoods', to avoid deliberate misinterpretation of the term.</p> <p>The text in the Core Document in the sections dealing with each settlement type does not appear to reflect the headings.</p> <p>The text on page 28 of the Core Document lists some common features of historic features. For Linby, this would include Bulwell Stone walls, water features (blue infrastructure), green spaces and</p>	<p>The Design Code Framework only applies to residential development. The Design Code does not seek to address employment, retail or development in town or local centres, which are covered by existing policies.</p> <p>Noted.</p> <p>Agree, but the flowchart needs to cover the pre-application process for those that chose to engage with it, as well as the planning application process. The flowchart reads: "<i>Consider options for Design Panel Review (E.g. Design Midlands / Design Council)</i>". The wording is clear that Design Midlands and Design Council are two examples to design review providers.</p> <p>The 20-minute neighbourhood approach is included in the emerging Greater Nottingham Strategic Plan. However, whilst reference is made to 20-minute neighbourhoods in the design code, the mandatory requirements look to maximise accessibility and are consistent with the principles of sustainability embodied in existing planning policy.</p> <p>It is unclear what is meant by the comment. It is considered that the text in the Core Document pp. 22-41 reflects the headings.</p> <p>Page 28 of the Core Document provides information on the 'Historic Villages' settlement type (n.b. one of the four settlement typologies across the Borough). However, settlement-specific information</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

	<p>linear settlement pattern which may be useful to add.</p> <p>It would be useful to emphasise some key principles.</p> <ul style="list-style-type: none"> • Responding to context should not be interpreted as requiring stylistic imitation or preventing creative, innovative and green design. • Where there is a Neighbourhood Plan in place, this should be followed (as part of the statutory development plan). <p>Major Sites Design Code P 14: Support the reference to suburban/rural interface and the need to consider the character of adjacent rural landscapes and adjacent settlements, and other local distinctive features, in addition to the requirements specifically for historic villages.</p> <p>P 16: the emphasis on architectural style could be interpreted as requiring stylistic imitation or preventing creative, innovative and green design. In fact, the character of historic villages includes both vernacular buildings and more formal architecture, creating architectural diversity (including national and international influences). We are uncomfortable that the text does not recognise this.</p> <p>P 19: Some examples include crude historic parodies, which should be avoided in the historic villages</p> <p>P 22 & 23: A problem in Linby CA is the removal of Bulwell Stone walls and boundary treatment erosion.</p> <p>P 24 & 25: Suggest that the text also refers to recycled materials and use of high-quality materials and construction with superior environmental performance and/or low embodied energy.</p> <p>P 32 & 33: The emphasis on solar gain should be changed to an emphasis on 'climate resilient' buildings which is better at tackling with overheating in summer months.</p> <p>P 40 & 41: Suggest replacing references to '20-minute neighbourhoods' with 'walkable neighbourhoods'. There is no mention of traffic-free routes or 'active travel'.</p> <p>P 44 & 45: the reliance on quantifiable standard distances</p>	<p>cannot be provided within Borough wide design codes.</p> <p>It is not the intention of the Design Code to prevent creative, innovative and green design from being delivered. Additional text to be added to confirm.</p> <p>The website will clarify that the Design Code should not be read in isolation.</p> <p>Noted.</p> <p>It is not the intention of the Design Code to require stylistic imitation or prevent creative and innovative design. Additional text to be added to confirm.</p> <p>As above</p> <p>The Design Code will be used to help determine planning applications for new boundary treatments.</p> <p>High-quality has some ambiguity and can't be verified through planning application processes. Recycling and reusing construction materials is referred to under G5 Low Carbon Homes. Embodied energy is covered by low carbon planning guidance and building regulations.</p> <p>Update text to read: "<i>contribute to climate resilience, passive energy gains and energy efficiency, such as with south facing elevations with larger windows</i>" (G4 Micro-climate, Major and Small Site documents).</p> <p>The 20-minute neighbourhood approach is referenced in the emerging Greater Nottingham Strategic Plan. Active travel is referred to under G3 (e).</p> <p>Design proposals must create plot ratios and retain outdoor amenity</p>	<p>The following statement has been added to the Introduction section: "<i>[The Gedling Design Code Framework] encourages exemplar and innovative designs that align with the Framework Principles.</i>"</p> <p>No change.</p> <p>No change.</p> <p>The following statement has been added to the Introduction section: "<i>[The Gedling Design Code Framework] encourages exemplar and innovative designs that align with the Framework Principles.</i>"</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Text amended.</p> <p>No change.</p> <p>No change.</p>
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	<p>between dwellings do not reflect the character of the historic villages and are likely to lead to generic 'anywhere' layouts. We would suggest that this entire section be rewritten from the perspective of good urban design.</p> <p>P 46: reference is made to 'Streets for a Healthy Life', but not to the related guidance 'Building for a Healthy Life' (though both are included on later pages). The text should highlight the mobility needs of different people.</p> <p>P 48 & 49: Suggest adding mention of personal vehicles.</p> <p>Figure 31 has a typo: 'is' should be 'if'.</p> <p>P 52 & 53: Useful to include guidance on the minimum size of bin enclosures.</p> <p>Small Sites Design Code Contains much less detail and excludes important issues. We suggest merging the two documents into one and perhaps adding a specific section on smaller sites.</p> <p>Extensions and Alterations We have the same concerns over reliance on quantifiable standard distances between dwellings which do not reflect the character of the historic villages.</p> <p>For historic buildings, light weight, transparent flat roof extensions can be less harmful than matching forms and materials. Useful to include examples of 'green' extensions or architect-designed extensions, especially for historic buildings.</p> <p>Observation Library P 22: Reference is made to York Stone only. In Linby there are Bulwell Stone walls which should be added.</p>	<p>areas that reflect the character of the local area. Where the required distances (i.e. 11m, 21m) contradicts with the local character, applicants can justify non-compliance. The given separation distances are minimum; so, there is scope to increase to reflect local character.</p> <p>C+H4 Street Design (pp. 46/47) includes references to Highway Design Guide, Manual for Streets I and II, Local Transport Note 1/20 and Streets for a Healthy Life. C+H5 Cycle Parking (pp. 48/49) has references to the above and Building for a Healthy Life and The Government's Vision for Walking and Cycling: Gear Change. References are placed according to the content of the principle.</p> <p>Pp. 48-49 contain requirements in relation to cycle parking. It is unclear what is meant by the comment.</p> <p>Noted. Amend caption (Figure 31) on page 51.</p> <p>Minimum size of bin enclosures falls outside scope of Design Code.</p> <p>Major Sites Design Code includes the complete set of design principles, while Small Sites and Extensions/Alterations Design Codes which include only those Design Principles which are relevant to these site sizes, for ease of use. It is unclear which important issues have been excluded.</p> <p>Design proposals must create plot ratios and retain outdoor amenity areas that reflect the character of the local area. Where the required distances (i.e. 11m, 21m) contradicts with the local character, applicants can justify non-compliance. The given separation distances are minimum; so, there is scope to increase to reflect local character</p> <p>The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>Update text on page 22 under Materials to read: "<i>There are <u>Bulwell Stone</u> boundary walls and natural York stone is used for footpaths and kerbs with local stone blocks used to manage verge parking.</i>"</p>	<p>C+H4(b) amended to read "<i><u>maximise the mobility needs of different people and retain or enhance the permeability and connectivity with the existing movement network and avoid severing existing connections</u></i>" in the Major Sites document.</p> <p>No change.</p> <p>Text amended.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Text amended.</p>
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	<p>Reference could be added to the Local Green Spaces designated in the Linby Neighbourhood Plan and also the Linby Conservation Area.</p> <p>General Comments The whole document requires an accessibility check, for example to deal with white text on certain coloured backgrounds.</p>	<p>The design code does not specifically refer to any local green spaces.</p> <p>Noted. A further accessibility check will be undertaken before the document is published on the Council's website.</p>	<p>No change.</p> <p>The Design Code documents have been subject to a comprehensive accessibility check using colour – contrast checkers after which various background colours have been updated in line with Level AA (strong accessibility) and Level AAA (excellent accessibility) Web Content Accessibility Guidelines (WCAG) conformance levels.</p>
Burton Joyce Parish Council	<p>We would wish a greater emphasis within the Framework on ensuring a diverse mix of housing</p> <p>More should be included about assessment of, prevention and alleviating flood risk from development.</p> <p>We believe that some additional narrative may be required for Burton Joyce.</p> <p>Core Document P 8: "The following steps shown in the flowchart are <u>encouraged to be followed</u>..." should use stronger language.</p> <p>Pp 28-31: Characterful and historic housing that should be referenced in future development often extends beyond the defined cores in villages, though there has been recent and significant village suburban growth around much of that historic housing.</p> <p>Observation Library We ask whether a direct reference to Burton Joyce should be made under a "Learning from..." heading. The village has some distinctive characteristics that could be described for consideration in further development.</p>	<p>This falls outside the scope of the Design Code and is covered by existing local plan policy.</p> <p>The design code should be read in conjunction with other planning policy documents, including the Aligned Core Strategy and Local Planning Document.</p> <p>It is unclear what additional narrative is being requested.</p> <p>Some elements of the flowchart are not mandatory (i.e. pre-app advice or stakeholder engagement). Hence, applicants can only be 'encouraged' to follow the steps shown in the flowchart.</p> <p>Noted.</p> <p>'Learning from Linby, Papplewick, Calverton, Lambley, Woodborough and Porchester Gardens' sections are intended to capture the diversity of high-quality places across Gedling and include their key qualities in the codes for new developments. We recognise that they do not cover the whole borough, as they are not intended to be exhaustive. They represent the most characterful examples of development across the Borough to inspire design proposals</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
Sport England	<p>Consideration should be given to how any new development will provide opportunities for people to lead healthy lifestyles and create healthy communities - Sport England's Active Design guidance can be used to help with this. Active Design complements the ten characteristics of well-designed places as set out in the National Design Guide and provides ten principles to help ensure the design and layout of development</p>	<p>Sport England's Active Design Guidance and the ten principles have been analysed in the Baseline Assessment stage which provided a useful context for informing specific design policies. However, the scope of the Design Code is to set out design requirements for new residential buildings. Opportunities for people to lead healthy lifestyles and create healthy communities is</p>	<p>No change.</p>

	<p>encourages and promotes participation in sport and physical activity.</p> <p>There is much within the Design Code which aligns with Active Design's principles, however, we would welcome reference to Sport England's Active Design Guidance and principles where relevant.</p> <p>The Council may also consider it beneficial to assess the draft code against the "Active Design Checklist"</p>	<p>better suited to local plan policies or other policy documents.</p> <p>Sport England's Active Design Guidance and the ten principles have been analysed in the Baseline Assessment stage (Baseline Assessment Report, p. 18), which provided a useful context for informing specific design policies.</p> <p>This level of detail falls outside the scope of Design Code.</p>	<p>No change.</p> <p>No change.</p>
Davidson Homes	<p>Concerned that the Code will not be a practical tool for proposed development. The Design Code is a complicated document, and it is not clear how it is to be translated to new development. Shown examples are almost hypothetical scenarios that do not reflect the nature of volume house building and the constraints imposed by the local Highway Authority.</p> <p>Part of our development at Mapperley Plains is featured within the Design Code although it is not clear what parts (or the whole) of the development are/aren't considered to accord with the ambitions of the Design Code.</p> <p>We would request training/briefing sessions to understand how the code is to be used and applied.</p>	<p>The Design Code Framework is structured into three separate documents based on site size, each of which include only those principles that are applicable to that site size. The purpose of the Design Code is to avoid standard house types and ensure that consideration is given to the local context. The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>Noted.</p> <p>Discussion with case officers will take place through the pre-application/application process.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
Environment Agency	<p>Core Document <u>Greener Gedling</u> Welcome the key aims.</p> <p>Standalone Documents (MJ, SS, E/A) <u>G2 "Green and Blue Infrastructure"</u> We welcome the mandatory requirements relating to "Green and Blue Infrastructure" and the provision of SuDS/soakaways. We support the detail included in the "Observe and Evaluate" section and its role in making Green and Blue Infrastructure part of the early design stage for sites.</p> <p><u>G5 "Low Carbon Homes"</u> We welcome the inclusion of this section.</p> <p>We welcome and support development which conserves natural resources including water, energy, materials, buildings, and land.</p> <p>We encourage the application of energy efficiency measures and the latest technology for new and where appropriate re-developments.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

	<p>As of 2021 Gedling Borough authority area lies within an area categorised as being under water stress. The design of buildings can contribute to the efficient use of water. The Design Code is an opportunity to encourage water saving mechanisms and habits, for example Waterwise Rainwater Harvesting Guidance, and by making reference to Optional Technical Standards for water efficiency standards. The latest BREEAM guidance should also be followed.</p> <p><u>G6 “Water”</u> We welcome the inclusion of this section and support the mandatory requirements that it includes.</p> <p><u>G7 “Biodiversity and Ecology”</u> We welcome the mandatory requirements to “provide connections between ecology habitats within and adjoining the site; [and] protect and enhance existing features of ecology and biodiversity value”.</p>	<p>This level of detail is outside scope of Design Code as covers technical standards better covered by local plan policy.</p> <p>Noted.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
Swifts Local Network	<p>The reference to swift bricks in each document is very welcome, but please add for information and to ensure suitable numbers and locations.</p> <p>The accompanying photograph in the documents is not very suitable.</p>	<p>The design code includes a desirable requirement to use swift bricks, bee bricks, bird boxes, insect hotels and hedgehog shelters. However, given that this requirement is not mandatory, it would not be appropriate to provide more detail on the preferred number and location of each.</p> <p>Agree. Use a different visual accordingly.</p>	<p>No change.</p> <p>Visual included in Major Sites, Small Sites and Extensions/Alterations documents has been replaced with a more suitable photo.</p>
Resident	<p>Core Document (p. 29, Para 1): Further detail about the issues of such standardisation (i.e. how it may be detrimental upon character) would be appreciated.</p> <p>Design Code Framework Requirements can read as quite permissive. There should be further evidence of workings-out, and more in-depth systems to assess, address and influence form for all scales of development.</p> <p>Extensions/Alterations Some observations could be more specifically articulated, particularly in explaining how features may interact with each other to influence local character. Although extensions/alterations only, it will still contribute to the character of the area, so a wider focus is still valuable.</p> <p>Inclusion of C1 Development Patterns would be more strategic and thus conducive to more characterful outcomes on all scales.</p>	<p>Design code principles C1 Development Patterns and C2 Characterful Homes provide further information that expand upon spatial typologies, development patterns and area character.</p> <p>Noted.</p> <p>It is unclear which observations are being referred to.</p> <p>The design code framework is structured into three separate documents based on site size, each of which include only those principles that are applicable to that site size. The purpose was to make it a practical tool for extension/alteration and small sites</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change</p>

		applications (84% of all applications within the last 5 years). C1 Development Patterns requirements would go outside the scope of Extension/Alteration applications.	
The British Horse Society	Gedling Borough Council has demonstrated through the development adjacent to Gedling Borough Country Park that vulnerable road users are not considered or included in plans and in correspondence re the country park, the council has not denied the inference that it is anti-horse.	Vulnerability of road users goes beyond scope of design codes, and is taken by Highway Design Guide (see Part 3.6 Shared Surface or Shared Space Streets and Squares). Furthermore, Highway Design Guide sets out applications that include a shared surface street will require a quality audit which includes walking, cycling and horse-riding assessment and review.	No change.
Redrow (Savills)	<ul style="list-style-type: none"> • Core Document <p>Reference to the engagement with stakeholders including the local communities in the drafting process. We understand that some stakeholder workshops have taken place, though it would have been good to understand how these events were able to shape the draft documents. It is not clear from the final draft suite of documents how collaborative the process has been.</p> <p>Reviewing the live responses to the mapping feedback it is clear that the platform does not guide the public sufficiently in the kind of feedback that can usefully inform the emerging design code. Many of the comments received pertain to development management concerns or other non-design matters. Whilst the reach of online platforms might be greater and appear to be initial more cost effective the resulting feedback is often less useful than that achieved through other means.</p> <p>Paragraph 134 of the NPPF notes that design guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area. The Council's own Statement of Community Involvement (2019) is clear that the level of engagement for Supplementary Planning Documents (pages 5-8) will be carried out at all stages of document preparation – including initial views on issues, feedback on initial idea through informal consultation as well as formal consultation on draft documents (which this current consultation seeks to do). It is not clear from the current suite of documents what the level of public engagement has been through the process of drafting the Design Code and whether the council has met its own process as set out in the SCI (2019).</p>	<p>A key element of engagement stage was to identify existing strengths and weaknesses of the built environment across the Borough, and map these using the 'Place Gedling' digital platform. The initial engagement took place at the start of the process with no draft code for residents to comment on, in order to better understand residents' views on design and to raise the profile of the Design Code.</p> <p>A wide range of stakeholders has been asked to contribute to this exercise, including residents, elected members, statutory consultees, special interest organisations, communities, neighbourhood and community planning groups, developers, other local authorities and council officers which attracted around 300 comments, 1,350 visits, 350 contributions and over 2,000 social media interactions.</p> <p>The Design Code addresses these through setting out street typologies, landscaping principles and how to successfully integrate blue and green infrastructure into the public realm. In light of the consultation feedback, the Design Code sets out good design principles that embrace placemaking principles and thereby can have a role in addressing the issues raised by respondents. Informal consultation was Consultation This was</p> <p>In the following stages, workshops and engagement <u>listed below</u> helped to develop and refine the framework and code principles:</p> <p>Stakeholder workshop / July 2022 Developers' Forum / June 2022 Developers' Forum / March 2023 Developers' Forum / January 2024 Planning Committee workshop / February 2024 Design reviews, monthly roundtable sessions and peer-to-peer meetings with MHCLG since June 2022 DM officer workshop / March 2023 DM pilots October 2023 - January 2024 Public consultation / 6 weeks - 12th July – 23rd August</p>	No change.

	<p>Based on the evidence of what people really want in a New Build dwelling, as evidenced in the Redrow DPP report, it would be hard to conclude that the four identified typologies, which whilst reflecting the heritage and layout of traditional housing in the borough, would not seem to follow the evidence for how people want to live in the UK in the 21st Century. This evidence demonstrates the gap between housing demand and the four typologies produced.</p> <p>Supporting documents that are required to be submitted in support of planning applications including a completed "Design Code Principles Checklist", a "Design Compliance Statement" and a "Design Brief". This is an overly complicated and onerous process and defeats the object of having a borough wide design code which should simplify the design process. A single Compliance Statement would be more effective and useful.</p> <p>Having recognised Woodthorpe and Porchester Gardens in Gedling as good references for design and placemaking the code then goes on to preclude the delivery of places like this with all of the proposed Spatial Typologies requiring a high density and urban approach to new housing.</p> <p>This is a failing of the design code to recognise the references of good quality design within the borough in the design codes. These are clearly very attractive and desirable places, and the Borough-wide code mentions them throughout as important character references. However, they are not reflected in the suggested development patterns or spatial typologies which is a missed opportunity to create a clear model that takes the best elements of these (tree lined streets, hedges, front gardens) and presents them in a way that can be used to deliver high quality new places. Unfortunately, as drafted the borough-wide design code</p>	<p>Workshop with developers and agents / July 2024</p> <p>The Coding Plan structures the Borough into four distinctive Settlement Types (a. Urban Area, b. Historic Villages, c. Former Colliery Villages and d. Ravenshead Village) that reflect their overall character and identity. These area typologies describe what exists within the Borough. Within these Settlement Types, it is possible to distil areas that are similar in character, and can form a number of Area Typologies by looking at layouts, built forms, topography, materials, morphology, economic activity (such as agriculture, framework knitting or mining). These are termed Local Area Types in the coding plan, and can identify how the character within these settlements differ in relation to their patterns of growth. The coding plan identified eight Local Area Types. The comments received by Redrow cannot be transferred to the content of the design code or coding plan.</p> <p>The Council will take a practical approach to the submission of documents as part of a planning application to demonstrate compliance with the Design Code. Guidance will be provided on the Council's 'Design Codes' web page.</p> <p>The approach taken by the design code is consistent with the Local Planning Document Policy LPD 33. The code (C3 Densities) reads: "<i>design proposals must demonstrate how they will make the most efficient use of land with regard to Policy LPD33</i>" and "<i>consider the role that dwelling types may have in promoting higher densities without having an impact on existing development patterns</i>".</p> <p>Design code principles take inspiration and reflect development patterns which make mature suburbs (Porchester and Woodthorpe) characterful and unique. The code document has reference to them in the following principles:</p> <ul style="list-style-type: none"> • C1 Development Patterns (a-iii): "<i>in or adjacent to the Mature Suburbs, draw on the unique features that contribute to the character of Woodthorpe and Porchester</i>". • C1 Development Patterns - visual example on page 13: 	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>has failed to capture these and include their key qualities in the codes for new developments. As a result, the Gedling Design Code as drafted would unfortunately fail to provide for the delivery of any new places with these important and desirable characteristics and qualities.</p> <p>All of the spatial typologies presented in Part 4 are essentially the same – higher density forms with buildings positioned on the footway with no front gardens and limited and remote car parking. As drafted the design code is focussed on the delivery of modern interpretations of medieval forms of housing expressed as high density, urban housing types.</p> <p>The NPPF provides guidance on what a Design Code should contain in order to achieve well-designed and beautiful places. It states that Design Codes should provide a local</p>	<p>Variety of dwelling plots in the Mature Suburbs</p> <ul style="list-style-type: none"> • C2 Characterful Homes (a-iii): <i>“the Mature Suburbs, where there are homes with a variety of individual designs. Detached homes in large plots in Woodthorpe are consistently spaced and have a variety of architectural features. In Porchester, within its grid of streets, there is a wider mix of types of individual designs on plots layout that create interest”.</i> <p>Core Document</p> <ul style="list-style-type: none"> • P. 12: <i>“The features that make Woodthorpe and Porchester Gardens attractive “Mature Suburbs” will be retained and enhanced to inspire good design elsewhere in the suburbs.”</i> <p>Observation library Introduction:</p> <ul style="list-style-type: none"> • <i>“At Porchester Gardens and Woodthorpe, tree lined streets and hedges prevail, while at Ravenshead, on the edge of Newstead Park, woodland forms a backdrop to housing.”</i> • <i>“At Porchester Gardens the street grid unites the area and provides for optimum connectivity”</i> • Pp. 34-35: Learning from Porchester Gardens • P. 54: <i>“Settlements in Gedling contain memorable streets, that should be incorporated into new development. These include the tree lined streets of the established suburbs such as Woodthorpe and Porchester”</i> • P. 62 Spatial Typologies - Creating distinctive new developments: <i>“The Mature Suburbs of Woodthorpe and Porchester Gardens which are regarded as the most attractive parts of the wider suburbs in the Urban Area”</i> <p>Comment appears to be made on an earlier version of the design code, as the consultation draft does not have a Part 4.</p> <p>Agree. Add reference to ‘variety’ under C2 Characterful Homes in the Major Sites and Small Sites documents.</p>	<p>No change.</p> <p>C2(f) Major Sites and (d) Small Sites amended to read <i>“design proposals must ensure that architectural features such as canopies, porches, bay windows, gables, brick detailing,</i></p>
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	<p>framework and that the 'level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place' with a 'suitable degree of variety'. Given the fairly tight typologies and their lack of variety it is not clear that the guidance has been followed in this respect.</p> <p>The Vision for new development in Gedling (page 13) implies that only development which reflects the tightly prescribed typologies should apply to each of the character areas and settlements within the borough. This might be appropriate in some situations where the development site is adjacent to areas of similar scale and density of housing. However, development on the edge of the lower order settlements which is based on the medieval or even 19th century pattern of development, with high-density terraced or shared open space cottagestyle development would be both inappropriate and quite likely unsaleable.</p> <ul style="list-style-type: none"> • Major Sites <p>The four Spatial Typologies as presented fail to capture the wide rich diversity of high-quality places across Gedling. They are far too focussed on a single reference – high density and urban forms inspired by the medieval and 19th/20th century places in Gedling. The impact of the tight segregation (Settlement Types) on future designs is that development patterns which often originated over the past several centuries and to meet the particular needs of the inhabitants at that time are being relied upon too heavily. Whilst there is a place for high density, urban forms inspired by these historic patterns this is not an appropriate model for many parts of the borough and attempting to impose high density design on places where this is not appropriate or desirable is unlikely to succeed and could therefore be categorised as poor design.</p> <p>The mandatory requirement "cul-de-sacs should be minimised and only used when there are demonstrable constraints" is too restrictive as it is very often necessary from an efficient</p>	<p>The wording is not prescriptive, and any departure could be justified. Pages 12-13 have the Illustrated Vision and some statements to expand on the vision which reads:</p> <ul style="list-style-type: none"> • <i>New development will be inspired by their unique features of the Historic Village Cores that make them distinctive and connected to the rural landscapes.</i> • <i>In the smaller Historic Villages such as Linby, Papplewick, Woodborough, Lambley and Stoke Bardolph, new development should seek to reference and retain their existing character.</i> • <i>Gedling Village retains many of its historic features which new development will reference, retain and enhance.</i> • <i>In the wider suburbs, proposals for small sites and alterations and extension will help to restore their original design language</i> • <i>In the steeper parts of the Urban Area innovative designs will work with the uniquely changing topography</i> <p>The Coding Plan structures the Borough into four distinctive Settlement Types. These area typologies describe what exists within the Borough rather than imposing any design requirements (i.e. high density). Within these four Settlement Types, there is a finer grain of Local Area Typologies (the coding plan identified eight local area typologies). These area types identify how the character within these areas differ in relation to their patterns of growth. The approach taken by the design code is consistent with Local Planning Document Policy LPD 33. The code (C3 Densities) reads: "design proposals must demonstrate how they will make the most efficient use of land with regard to Policy LPD33" and "consider the role that dwelling types may have in promoting higher densities without having an impact on existing development patterns".</p> <p>Although cul-de-sacs are designed with the best intentions, i.e. to provide quiet and safe spaces for children and residents, they have proven counterproductive as they</p>	<p><i>eaves, window and door styles, and roof forms and pitches reflect the character of the local <u>area and create variety and interest.</u>"</i></p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>use of land perspective and for placemaking reasons. The terminology 'should be minimised' can lead to an element of interpretation and uncertainty in the development management process. The Spatial Typologies 1, 2 and 3 all include streets that are cul-de-sacs or closes, so for the avoidance of confusion the text should be revised to allow for short cul-de-sacs and closes.</p> <ul style="list-style-type: none"> Observation Library The lessons learnt from Woodthorpe and Porchester Gardens are not brought forward into a Spatial Typology for 21st Century interpretations of these types of places, although they are referred to elsewhere in the code documents as exemplary references <p>There needs to be Spatial Typologies that provide for detached and semi-detached homes in attractive settings. As drafted the only model presented is for high density, cluster forms of housing which would preclude the delivery of anything like the highly successful Woodthorpe and Porchester Garden places which remain very popular.</p> <p>The section on 'Spatial Typologies – Creating distinctive new developments' from page 62 onwards should be expanded to include examples of medium density, landscape led places (inspired by Porchester Gardens and Woodthorpe). As drafted, all of the Spatial Typologies are essentially the same – generally higher density, urban forms of housing which may have a place in some locations, typically in or near the core of the villages in the authority but will be completely inappropriate and unsuccessful in many other areas.</p> <p>On page 31 of the DPP the results of a question about the attractiveness of various street typologies demonstrates that the residents questioned found that two story traditional terraced streets were considered to be attractive in just over half of examples (56%). Whereas detached and semi-detached housing, whether traditional or contemporary in design were considered to be attractive in 75-84% of cases. Importantly the examples for semi-detached and detached homes included front and rear gardens and parking to the front or side of the property – features which the majority of the respondents valued highly.</p> <ul style="list-style-type: none"> The Viability Assessment The conclusion of the viability assessment is that the design guide will have little to no effect on the 	<p>pose serious accessibility and permeability concerns.</p> <p>Porchester and Woodthorpe are referred to as good design examples in the design code framework (see comment above). The Core Document states Mature Suburbs will be retained and enhanced to inspire good design elsewhere in the suburbs, and C1 Development Patterns provides a visual to indicate variety of dwelling plots in the Mature Suburbs. However, the wording of the mandatory requirements is not overly prescriptive, therefore, bringing them forward into a 'Spatial Typology for 21st century interpretations' goes beyond scope of design codes.</p> <p>We recognise that these Spatial Typologies do not cover the whole borough, as they are not intended to be exhaustive. They represent the most characterful examples of development across the Borough's settlements to inspire the design of proposals for small and major sites. Additional Spatial Typologies will be considered if they are inspired by other localities of interest.</p> <p>Noted. The comments received by cannot be transferred to the content of the design code.</p> <p>Noted. The wording of the mandatory requirements is not overly prescriptive and it is</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>value and therefore the viability of developments which follow the pattern of development prescribed by the design code. We do not agree with this conclusion.</p> <p>The sheer number of mandatory requirements without the flexibility of being suggestions rather than mandatory, would in fact impact upon viability.</p> <p>The lack of clarity combined with the mandatory nature of these few examples demonstrates the potential for future concerns with a published code. For instance page 33 (Major Sites):</p> <ul style="list-style-type: none"> • “use locally sourced materials”. How local is local in this instance • include rainwater harvesting. Is rainwater harvesting a suitable solution in all instances, it could be part of fully comprehensive drainage scheme – but might not fit with some needs or indeed designs • integrate permeable surfaces; in the majority of instances we could agree they are the most suitable for of surface treatment but not in all instances. Does the word ‘integrate’ here imply that only when those elements are prescribed (though other polices) the requirement here is that there are fully integrated into a design? <p>Requiring these all to be followed as part of the design guidance, seemingly without exception, there is very little flexibility to tailor design solutions which might be more appropriate to their context. By being this prescriptive the design code could fail to be flexible enough for viable schemes and affect desirability and deliverability of future development in the borough.</p> <p>General Comments The emerging Gedling Design Code Framework is not considered to sufficiently take into account the views of aspirational homes owners. This could affect both the viability and delivery of development in the Borough. The level of prescription and the relatively tight design</p>	<p>considered that compliance can be demonstrated without impacting significantly on viability.</p> <p>As above.</p> <p>The wording is not prescriptive, and any departure could be justified.</p> <p>The design code aims to ensure new development is in-keeping with the range of materials found in the local area. The code requires proposals to “<i>use locally sourced materials where relevant and appropriate</i>”. The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>The checklist provides an opportunity to justify non-compliance with the Design Code on the basis of site-specific considerations which will then be considered through the planning application process.</p> <p>As above.</p> <p>Applicants can justify any departure from the Design Code on the basis of site-specific considerations.</p> <p>Noted. The comments received by Redrow regarding views of aspirational homes owners cannot be transferred to the content of the design code.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>typologies and the areas in which they are directed are considered to be too restrictive. In light of the new Government's recent announcements on the need to increase house building and therefore reduce restrictions on the deliverability of homes these restrictive guidelines are un-welcome.</p> <p>The mandatory requirements read as policy statements and attention is drawn to that having to be followed in all instances. Given the total of around 150 requirements there is real concern that the design code SPD goes too far beyond the adopted local plans (that is part 1 and part 2) and it is not compatible with them.</p> <p>The NPPF is clear in section 12, para 133 that "Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design" but that they should do so with "a suitable degree of variety". The design code as set out, with the inflexibility of over 150 statements that each design must meet would fail to meet this test.</p>	<p>Code principles are not inconsistent with other policy documents and local plans, particularly mandatory requirements (i.e. 'musts'). They are expanding upon and providing details to local plan policies, notably LPD 32 and LPD 35. Engagement with key stakeholders indicate that separation distances are what is already being provided by developers as good practice at present, and therefore are unlikely to create any significant viability concerns. Also, applicants have an opportunity to justify non-compliance which will then be considered through the planning application process.</p> <p>Applicants can justify any departure from the Design Code on the basis of site-specific considerations.</p>	<p>No change.</p> <p>No change.</p>
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