

## Comments

### Local Planning Document - Issues & Options (21/10/13 to 16/12/13)

**Comment by** Linby & Papplewick Parish Council (Mrs Denise Ireland)

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#### CC 1a

##### 1 - Renewable and Low Carbon Energy generation

The National Planning Policy Framework identifies that planning plays a key role in supporting the delivery of renewable and low carbon energy which is central to sustainable development. All communities have a responsibility to contribute to the generation of energy from renewable and low carbon. To help achieve this, the National Planning Policy Framework asks that Local Authorities consider identifying areas as being suitable for different technologies. Policy 1 of the Aligned Core Strategy gives support to renewable energy schemes appropriate for the area.

If we decide to identify areas suitable for renewable energy schemes it may mean that areas within the Green Belt are identified. It does not, however, mean that we will automatically be able to refuse planning permission for proposals outside the areas identified.

**Should we identify areas of the Borough as suitable for renewable and low carbon energy generation?** No

#### CC 1b

There will need to be a policy against which to assess proposals for renewable and low carbon energy generation. This policy will also apply to the areas outside any area identified as 'suitable'.

**Should any of the following criteria be included in the policy (please tick all that apply)?**

- . Green Belt
- . Biodiversity and Geology
- . Landscape and Visual
- . Noise and Vibration
- . Shadow flicker and reflected light
- . Traffic and transport (including air traffic)
- . Heritage
- . Character of the Area

- . Amenity of those nearby
- . Electromagnetic transmission
- . Defence and radar

## CC 1c

### Please use this space to make any further comments in response to CC 1a and CC 1b

The Parish Councils take the view that all the listed criteria should be included within the policy. The range of both technologies and scale of proposals from micro to macro mean such a comprehensive list is necessary.

It is better to view each application for installation of low carbon and renewable technologies on individual merit, whilst retaining a positive and encouraging culture. Renewable energy technologies are developing rapidly and the economics influenced by Government Policy as well as commercial factors. Identifying suitable areas could raise local concerns or influence other decisions when sites identified may not fit emerging criteria

## CC 2a

### 2 - Managing Flood Risk

The National Planning Policy Framework and Policy 1 of the Aligned Core Strategy address flood risk. They require that development is steered towards locations that are at less risk of flooding or, if this is not possible, that the 'exceptions test' is passed. The 'exceptions test' allows for development in an area at risk of flooding in certain circumstances such as where the use is considered less vulnerable to harm from flooding or where the land is already developed.

There is a requirement in Aligned Core Strategy Policy 1 and the National Planning Policy Framework that development should not increase flood risk elsewhere by reducing surface water run-off through the use of Sustainable Urban Drainage Systems (known as SUDS).

**Is there a need for any further policy on managing flood risk and SUDS?** Yes ? further policy required (please set out what below)

## CC 2b

### Please use this space to provide any information in support of your response to CC 2a

A report on the Greater Nottingham Strategic Flood Risk Assessment (GNSFRA) prepared by GBC Planning Policy Manager and tabled at GBC Cabinet meeting on 4th September 2008 and subsequent Planning Committee on 9th Sept 2008 concluded:

*(Para 9) For Gedling Borough, the SFRA primarily consolidates and expands upon existing flooding information to provide a more complete picture of flood risk and its impact on planning. As such, there are no significant changes from existing flooding information, with the exception of less flooding predicted in Netherfield and greater flooding around Stoke Bardolph.*

With this in mind the Parish Councils are of the opinion that the existing NPPF (section 10) & Policy 1 of the ACS are not being properly applied.

#### **The NPPF Requires;**

*Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies*

In addition the deletion of policy ENV41 (Flooding) from the Gedling Replacement Local Plan and the lack of evidence-based replacement policy puts areas of the bordering districts (for example, Ashfield and Nottingham City along the River Leen) at risk of flooding.

Paragraph 7 (Below) of the GBC Planning report on the GNSFRA implies an absence of Strategic Flood Risk review at local level (as part of policy review) and indicates the need for Site Specific Flood Risk Assessment:

*"Although the report has been specifically commissioned to inform Local Authorities in their approach to land use planning, the study will be of interest to residents, land owners, developers and other agencies. However, it is important to note that the SFRA does not remove the*

*Need for detailed site-specific flood risk assessments. Consultants and developers are strongly advised to contact the Environment Agency for advice on sites with unimplemented planning permissions where flood risk appears greater than previously thought, or on sites where outline*

*Planning permission has been granted or further information was required by condition, as further Flood Risk Assessment work may be needed. Queries regarding flooding matters and the interpretation of the study will continue to be referred to the Environment Agency."*

Policy is required to **ensure** that flood management simply does not relocate the problem to areas considered of lower economic or social value such as agricultural land and areas of low management input which provide important ecological value.

### **CC 3a**

#### **3 - Carbon Reduction**

One of the key aims of the National Planning Policy Framework and Policy 1 of the Aligned Core Strategy is to achieve a reduction in carbon emissions. The reduction can be achieved in a number of different ways such as the implementation of renewable energy, use of electric cars and energy efficiency measures in the home.

**Should a target be set for how much carbon should be reduced by over the course of the plan period (up to 2028)?** Yes (please specify how this can be monitored and managed below)

### **CC 3b**

**Please use this space to make any other comments in support of your response to CC 3a or any other comments regarding carbon reduction.**

Government targets for carbon reduction, as set out in the Low Carbon Transition plan, have to be achieved. Incorporation of targets within planning policy can encourage and help enable residents and businesses to achieve these targets without (or with) reduced Government intervention. Your document only mentions three methods for reducing carbon; this list is very limited in scope and vision. Local planning policy needs to consider many different options including thermal and energy management of buildings and structures, layout and transport infrastructures, for example locating major residential developments close to services, existing transport links, existing utilities etc. We consider that ensuring development of brownfield sites in preference to Greenfield ones (in accordance with NPPF) is essential if the Borough is to succeed in delivering carbon reductions both in the short and long term. Productive agricultural land provides a greater 'carbon sink' than Brownfield, therefore, to help address climate change the preference must be to develop Brownfield land and safeguard farmland.

### **CC 4a**

#### **4 - District Heating**

District heating schemes move heat from uses where there is excess heat to users which require heat. District heating can offer a more efficient heating system that reduces carbon emissions. However they require significant upfront investment.

**Please use this space to identify any opportunities for district heating schemes in Gedling Borough. Please also use this space to provide any comments regarding district heating schemes.**

We are unable to suggest any district heating schemes that we have identified. Small heating plants using renewable fuels such as biomass and or bio-gas production often lend themselves to district heating schemes and therefore are candidates for a positive stance to be applied. We believe that the

Borough should reference this in their policy, so that developers of smaller sites are encouraged to consider a wider range of options.

## **GB 1a**

### **1 - Extensions and Replacement Buildings**

The National Planning Policy Framework states that extensions to buildings in the Green Belt resulting in "disproportionate additions" should not be permitted. It is left to local authorities to set out what is considered 'disproportionate'. Policy ENV38 of the Replacement Local Plan defines 'disproportionate' as more than 50% of the original floorspace of the dwelling.

In reviewing the policy we have the option to set a higher or lower percentage. A higher percentage would allow larger extensions to be built but may impact on the openness of the Green Belt. A lower figure would reduce the impact on the openness of the Green Belt but would limit the size of extensions that could be built.

A different approach could be to adopt a criteria based policy which doesn't include a percentage. This could set out a range of different factors that could be taken into account such as the size of the built form, any buildings to be demolished, the nature of the site and the way the proposed extension impacts on the openness of the Green Belt. However, this approach would not provide certainty to applicants

**Should we**

Don't set a percentage but use a criteria based approach?

## **GB 1b**

### **Please use this space to make any comments in support of your responses to GB 1a**

The percentage-based approach can limit scope and may not achieve the best outcome for applicant, neighbours and others. Setting a number of strict but structured criteria, including volume, could result in a better overall development. One of the criteria should be a percentage, but where other criteria are met to give a better outcome it can be relaxed. For example this could encourage the replacement of poor quality structures with better alternatives.

## **GB 1c**

The National Planning Policy Framework states that replacement buildings are appropriate in the Green Belt provided they are not 'materially larger'. As with extensions to buildings what is considered materially larger is to be set by each local authority. At present ENV29 of the Replacement Local Plan applies two different percentage; 50% of the floorspace of the original dwelling or 15% of the current building if it has been extended.

The options in taking this forward are similar to those for extensions.

**Should we:**

Continue using the current floor space approach and percentage?

## **GB 1d**

### **Please use this space to make any comments in support of your responses to GB 1c**

This policy retains the principle of the Greenbelt and reduces risk of over-development of sites and plots of limited dimensions. Volume should also be taken into consideration.

## **GB 1e**

ENV28 and ENV29 only refer to 'dwellings' while the NPPF refers to 'buildings'.

**Should we:**

Use the same approach for both residential and non-residential buildings?

## GB 2a

### 2 - Curtilage Buildings within the Green Belt

Curtilage buildings are buildings that are ancillary to the main building and may be permitted development (meaning they don't need planning permission). However they have the potential to adversely affect the openness of the Green Belt. By issuing an Article 4 direction the Borough Council could require owners wanting to build curtilage buildings such as workshops, 'granny' annexes and summerhouses to apply for planning permission. If this is introduced we will need a policy in place to assess proposals.

**Should we introduce an Article 4 direction to require planning permission for the construction of curtilage buildings?** Yes (please specify what a policy should cover below)

## GB 2b

**Please use this space to make any comments in support of your response to GB 2a.**

The policy should require Planning Permission for any construction of curtilage buildings other than one single domestic type shed and greenhouse. The impact of larger structures on the community should be a matter for the Community to have an opportunity to provide views and comment. This offers better protection to the Greenbelt from poor development and development which may have wider impacts than immediately apparent.

## GB 3a

### 3 - Agricultural Workers Dwellings

The National Planning Policy Framework states that the "essential need for a rural worker to live permanently at or near their place of work" may be one of the special circumstances to allow new isolated homes in open countryside. Previously Annex A of Planning Policy Statement 7 (PPS7) set out detailed criteria to assess when an agricultural dwelling was considered 'essential'

**Should we:** Base a policy approach on Annex A of PPS7?

## GB 3b

**Please use this space to support your response to GB 3a above**

It is important that there is adequate proof that a dwelling is essential in the long term as well as immediate. Adopting the PPS7 approach will help achieve this and gives consistency with other administrative areas nationally.

## GB 4a

### 4 - Reuse and Conversion in the Green Belt

The National Planning Policy Framework states that the re-use or conversion of existing buildings in the Green Belt is not inappropriate provided they are of a permanent and substantial construction. There is a potential loophole whereby buildings, such as stables, which have only recently been granted permission for an appropriate Green Belt use apply for permission to convert to a use that would not have been granted planning permission initially.

**Should we:** Adopt no policy and rely on the National Planning Policy Framework?

## GB 4b

**Please use this space to support your response to GB 4a above.**

The Parish Councils share the concern expressed regarding the potential loophole. Thus there is merit on setting a minimum time period before buildings can be considered for redevelopment. However in the event of a time period being set, it is possible buildings could cease being used for their intended purpose and fall into disrepair and become derelict. It is important that a strong stance is taken against inappropriate redevelopment or redevelopment which is considered to be taking advantage of this loophole. This should be set out within the planning policy adopted.

#### **GB 4c**

Similarly the Framework also states that limited infilling and the partial or complete redevelopment of developed sites in the Green Belt is not inappropriate development. This means that sites such as Nottinghamshire Police Headquarters could be redeveloped for housing or other uses.

#### **Should we:**

Adopt a policy to define 'limited infilling' but otherwise rely on the National Planning Policy Framework?

#### **GB 4d**

#### **Please use this space to support your response to GB 4c above.**

This approach would allow for progressive development and better utilisation of existing sites within the Greenbelt, thereby reducing pressure on Greenfield Sites and offering scope for a better outcome. The Policy developed should be very clear in scope and not allow over-development or inappropriate development of sites. Criteria such as architectural merit and sustainability, work/living can be set to ensure that only high quality and proportionate development takes place on such sites.

#### **GB 4e**

The Framework discourages the re-use of redundant or disused buildings as isolated rural homes unless there are associated enhancements to the immediate setting

#### **Please use this space to identify how this should be balanced against the support for re-use of buildings in the Green Belt.**

It is preferable for buildings within Greenbelt to be reused, but it has to be accepted that buildings can become redundant and there become a resource with potential for further use. Planning policy often stipulates what materials can be used and alterations made to such buildings, but then little control is applied to the surroundings or context within which that building sits. This can result in the finished premises not fitting in with the location. Policy needs to include the building and curtilage to ensure the context of that building is retained, if it is felt that this is necessary.

#### **GB 5a**

#### **5 - Permitted Development Rights in the Green Belt**

Some minor development does not need to be granted planning permission if it is defined as 'permitted development'. In some instances we have removed permitted development rights from specific properties when we have granted planning permission to protect the openness of the Green Belt. This means that any further development requires planning permission. By putting in place an Article 4 direction this would remove Permitted Development rights for a specified area thereby providing clarity to property owners.

#### **Should we:**

Continue to remove permitted development rights on a case-by-case basis?

#### **GB 6a**

#### **6 - Safeguarded Land**

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). The land currently designated as safeguarded is shown on the Replacement

Local Plan Proposals Map. Policy ENV31 of the Replacement Local Plan sets out how development on these sites is considered.

**Should we:** Not identify safeguarded land?

### **GB 6b**

Please use this space to provide any comments you have regarding the identification and allocation of safeguarded land.

The Parish Councils are of the opinion that the LPD should not identify safeguarded land, for the following reasons.

The National Planning Policy Framework ("the Framework") at para. 85 makes it clear that safeguarded land is not allocated for development. The Inspector who presided over the public examination into the extant Replacement Local Plan had this to say regarding the Council's safeguarding policy: -

*" The first thing I have to say about a policy to control development in areas of Safeguarded Land is that in my view it is very definitely not a housing policy. I say this for three reasons. First, its purpose is to control (and prevent) permanent development during the plan period. Second, it is not a foregone conclusion that all (or any) Safeguarded Land will need to be developed - that will depend on the need to find greenfield land for development in future Local Plan reviews. And third, even if development does eventually take place, it may not be housing. "*

There is undoubtedly a risk that safeguarding could provide an escape from debates on impact and mitigation and this risk is, to some extent, borne out by the proposed allocation of Top Wighay Farm and land North of Papplewick Lane as priority sites for development in the ACS. Safeguarded land is not land allocated for development. The ACS together with the LPD should allocate sufficient land to accommodate the housing and employment needs for the Borough over the Plan Period and beyond this, any future allocations should only occur following a review of the Local Plan and in light of the identified needs for the Borough at that time.

The safeguarding of land leads to uncertainty regarding the future development (or not) of safeguarded land. As such, safeguarding conflicts with one of the essential roles of the Local Plan, to give certainty and clarity over where and when future development will occur.

The Parish Councils feel that for too long, the safeguarding of the land at Top Wighay Farm and land North of Papplewick Lane has blighted the villages and this is no doubt the case in other parts of the Borough. These sites should be reverted back to Green Belt to avoid uncertainty over their future development.

### **GB 8**

**Please use this space to identify any matters related to the Green Belt which are not addressed here or elsewhere.**

Re point GB1e I was unable to remove my tick - we are unable to form a conclusive view, as there are many different forms and types of non-residential buildings

### **URB 1a**

#### **1 - Arnold**

Alongside existing planning permissions these sites have been assessed as suitable for possible development:

- 1 Rolleston Drive (Former County Council Depot) - about 100 homes
- 2 Around Howbeck Road and Brookfields Garden Centre - about 400 homes
- 3 North of Redhill - about 200 homes

**Are there any obstacles to the development of these sites which cannot be overcome?** No ? the sites can be developed

#### URB 2a

##### 2 - Carlton

Alongside existing planning permissions the sites have been assessed as suitable for possible development:

- 1 Off Spring Lane - about 100 homes
- 2 Between Linden Grove and the A612 - about 115 homes
- 3 Teal Close and North of Victoria Park - about 400 homes

Please note that a planning application has been submitted for the Teal Close site for 830 homes.

**Are there any obstacles to the development of these sites which cannot be overcome?** No ? the sites can be developed

#### URB 2d

**Please use this space to identify any development sites around Carlton that have been missed or make any other comments regarding development in the Carlton area.**

Policy 2 of the ACS adopts a strategy of urban concentration with regeneration which, according to the LPD, " means that when looking to identify sites for development, preference will be given to sites in and around urban areas "

There is a current planning application before the Council for the development of the site at Teal Close including, amongst other things, 830 new homes. The developers who are promoting the site for development have confirmed that there are no significant obstacles to the development of the site. However, this is neither stated in the draft ACS nor properly reflected in the LPD. The site should be identified as a strategic housing site in the ACS. The site lies adjacent to the Nottingham Principal Urban Area (PUA) and therefore has significant advantages in sustainability terms, in line with the strategy of urban concentration with regeneration.

The Proposals Map should be amended to reflect the full extent of the Teal Close site.

#### KEY 1a

##### Bestwood Village

Suitable sites have been identified through the SHLAA process to the north, north east and east of the village. These are shown in Appendix C.

**Do you support development?**

**At another location (please specify which below)** Yes

#### KEY 1d

**Please use this space to identify other locations around Bestwood Village that could be developed.**

The ACS adopts a strategy of urban concentration with regeneration [1]. The Framework advises that planning policies should avoid the long-term protection of sites allocated for employment use [2]. Despite the above, the LPD in its current form identifies a number of sites adjoining the village of Bestwood for future development and yet overlooks the opportunity for Bestwood Business Park to accommodate housing, which lies within the built-up area. There is clear evidence to demonstrate that part of the Bestwood Business Park would be suitable for housing development of sufficient size to accommodate 220 houses and that not all of the land is needed for its current employment allocated use.

This site should therefore be included as a housing land allocation in the LPD and the Proposals Map should be amended to reflect the above

## KEY 2a

### Calverton

Suitable sites have been identified through the SHLAA process to the north, north west, west and south west of the village. These are shown in Appendix C.

#### Do you support development:

To the north of the village	Yes
To the north west of the village	Yes
To the west of the village	Yes
To the south west of the village	Yes

## VIL 3a

### Linby

A map showing the suitable sites around Linby identified in the SHLAA can be found at Appendix D. No sites, other than those with planning permission, have been found suitable in or adjacent to Linby. The Strategic Sites shown on the map are covered by the Aligned Core Strategy and do not form part of this consultation.

Do you agree that there are no development sites in or on the edge of Linby? Yes

## VIL 3b

Linby is currently defined as an infill village. Do you think that the openness of Linby is a feature that needs protection? Yes ? Linby should continue to be a ?Green Belt Wash? village

## VIL 3c

The map at Appendix D shows the current development boundary of Linby. Alongside the changes to allow for housing this could be changed to correct minor discrepancies or to ensure that the Green Belt follows a defensible line on the ground.

#### Please use this space to identify where development boundary of Linby should be changed.

The Parish Councils are of the opinion that the development boundary of Linby is suitable but would have no objection to the correction of "minor discrepancies" subject to any proposed changes being open to public consultation

## VIL 3d

#### Please use this space to provide any information in support of your responses above or any other comment you wish to make about Linby.

Linby is a small conservation village containing a significant number of the Borough's listed buildings. Consequently, the opportunities for development are limited and there are no sites other than those with planning permission that are considered suitable for development so as to warrant positive inclusion in the LDP. Any other sites that come forward for housing development in the future will be assessed against general development control criteria. Policy ENV30 should continue to apply with the exception that the size of extensions to existing dwellings and size of any replacement dwellings should be capped to no more than 50% volume of the original dwelling Linby is a small conservation village containing a significant number of the Borough's listed buildings. It is therefore appropriate to limit

development in the village and its inclusion in the Green Belt provides a degree of protection for the village itself. However, the Parish Councils would wish the Council to note the comments made below in respect of the proposed allocations of Top Wighay Farm and land North of Papplewick Lane, the impact of which would be far greater than small-scale infill development.

The LPD states that growth in the village of Linby, amongst other villages, "*will be to meet a local need only and is expected to be reasonably small in scale, compared to the growth elsewhere.*"

In the case of Linby, the Parish Councils feel that there is an inherent irony here in terms of the Council's policy approach to housing development in the village. On the one hand this policy seeks to restrict new housing development to only that which meets a 'local need', but on the other hand the Council is proposing two huge sustainable urban extensions perilously close to the village. The Parish Councils have of course made representations to the ACS in this respect and the Inspector raised sufficient concern regarding these two proposed sites that the outcome is unclear and uncertain at this site.

#### **VIL 5a**

##### **Papplewick**

A map showing the suitable sites around Papplewick identified in the SHLAA can be found at Appendix E. No sites, other than those with planning permission, have been found suitable in or adjacent to Papplewick. The Strategic Sites shown on the map are covered by the Aligned Core Strategy and do not form part of this consultation.

**Do you agree that there are no development sites in or on the edge of Papplewick?** Yes

#### **VIL 5b**

**Papplewick is currently defined as an infill village. Do you think that the openness of Papplewick is a feature that needs protection?** Yes ? Papplewick should continue to be a Green Belt Wash? village

#### **VIL 5c**

The map at Appendix E shows the current development boundary of Papplewick. Alongside the changes to allow for housing this could be changed to correct minor discrepancies or to ensure that the Green Belt follows a defensible line on the ground.

**Please use this space to identify where development boundary of Papplewick should be changed.**

The Parish Councils are of the opinion that the development boundary of Papplewick is suitable but would have no objection to the correction of "minor discrepancies" subject to any proposed changes being open to public consultation

#### **VIL 5d**

**Please use this space to provide any information in support of your responses above or any other comment you wish to make about Papplewick.**

Papplewick is a small rural parish containing a significant number of the Borough's listed buildings. Consequently, the opportunities for development are limited and there are no sites other than those with planning permission that are considered suitable for development so as to warrant positive inclusion in the LDP. Any other sites that come forward for housing development in the future will be assessed against general development control criteria.

Papplewick is a small conservation village containing a significant number of the Borough's listed buildings. It is therefore appropriate to limit development in the village and its inclusion in the Green Belt provides a degree of protection for the village itself. However, the Parish Councils would wish the Council to note the comments made below in respect of the proposed allocations of Top Wighay Farm

and land North of Papplewick Lane, the impact of which would be far greater than small-scale infill development.

The LPD states that growth in the village of Papplewick, amongst other villages, " *will be to meet 'local need' only and is expected to be reasonably small in scale, compared to the growth elsewhere .*"

In the case of Papplewick, the Parish Councils feel that there is an inherent irony here in terms of the Council's policy approach to housing development in the village. On the one hand this policy seeks to restrict new housing development to only that which meets a 'local need', but on the other hand the Council is proposing two huge sustainable urban extensions perilously close to the village. The Parish Councils have of course made representations to the ACS in this respect and the Inspector raised sufficient concern regarding these two proposed sites that the outcome is unclear and uncertain at this site

## **HOU 1a**

### **1 - Approach to Density**

The National Planning Policy Framework requires that local authorities set out their own approach to housing density to reflect local circumstances. Our current approach (Policy H8 of the Replacement Local Plan) requires a minimum of 30 dwellings per hectare with a higher density close to transport routes and key facilities such as schools and supermarkets. Higher density may mean less land is needed but will also affect the type of housing that can be built.

Alternative approaches could look at setting different targets for different parts of the Borough. These targets could either reflect the existing density of the area (continuing the type of house already found in the area) or contrast with the existing density (potentially providing a different type of house in the area).

**Should we:**

Continue our current approach?

## **HOU 3a**

### **3 - Affordable Housing**

There is a need to provide for affordable housing in Gedling Borough. Our current policy approach is set out in the Affordable Housing Supplementary Planning Document. This requires a different percentage of affordable housing in different parts of the Borough based on the financial viability of developing a site in that area. A higher percentage of affordable housing is required in the stronger sub-markets within the Borough.

**Should we:**

Continue with the approach set out in the Affordable Housing Supplementary Planning Document

## **HOU 4c**

**Please use this space to make any comments in support of your comments to HOU 4a and HOU 4b or any other comments regarding the provision of traveller sites.**

This section needs to be altered to reflect the proposed amendments to the Aligned Core Strategy. The references to Top Wighay and North of Papplewick Lane as possible traveller sites should be deleted.

## **HOU 5a**

### **5 - Windfall Policy**

Within the development boundaries of the urban area and 'Green Belt Wash' villages housing is generally permitted subject to other policies of the development plan. Currently Policy H7 of the Replacement Local Plan sets out our approach and states permission will be granted for housing schemes in these areas subject to the design of the scheme, the proposal not resulting in the loss of buildings or features which make an important contribution to the appearance of the area and the proposal not being contrary to other policies.

**Should we:**

Adopt a different approach (please state what below)?

## HOU 5b

### **Please use this space to provide comments in support of your response to HOU 5a**

Windfall Policy for Green Belt Wash villages is in principle acceptable, but we consider the criteria for what is allowed should be strengthened and greater consideration given to the views of local residents and Parish Councils. Of particular concern is the over development of Windfall plots with residences which are out of scale for their surroundings or do not retain an element of openness and space between adjacent properties.

## HOU 6a

### **6 - Allocated Sites**

Allocating sites provides certainty that the site will be developed for that purpose. By allocating sites for housing we can show that the objectively assessed housing need for the Borough can be met and show which sites will be brought forward for development. Whilst allocating sites for housing provides greater certainty that those sites will come forward for housing it is not appropriate to allocate all sites (including those for 1-2 homes) as these would be difficult to show on the Policies Map and would reduce flexibility. This does not affect the number of homes available to meet our housing target.

### **Should we:**

Allocate sites of more than 10 dwellings?

## HOU 6b

### **Please use this space to provide comments in support of your response to HOU 6a.**

The Parish Councils acknowledge that it would be unfeasible to allocate sites in the LPD that are capable of accommodating fewer than 10 dwellings.

However, given the contribution that a large number of smaller sites capable of accommodating 10 or more dwellings can make to meeting the Council's overall housing land supply, it is considered appropriate to allocate sites of 10 or more dwellings that are suitable and available for housing over the Plan Period. A significant number of these smaller sites are likely to be within the urban area and many will be previously developed, thereby furthering the strategy of urban concentration with regeneration. This approach will also minimise the proportion of greenfield sites in the countryside and Green Belt that will have to be released for housing, because the LPD will more accurately reflect the supply of land for housing throughout the Borough.

## HOU 7

### **Please use this space to identify any matters related to Housing which are not covered here or elsewhere .**

With regard to the issue of housing more widely, the Parish Councils have made detailed representations concerning the Council's current spatial approach to the distribution of housing as set out in the draft ACS whereby it is seeking to developed greenfield sites in the countryside/Green Belt as a priority over brownfield sites within existing urban areas.

We are advised that the LPD must be prepared in accordance with the advice in the Framework and the policies in the ACS. However, in its current form, it is considered by many parties that the ACS is not a sound plan. Accordingly, until the Inspector has reported her findings in respect of the ACS there is no sound and reliable basis upon which the LPD can be formulated. The Parish Council's therefore question the suitability of consulting on the LPD at this stage

## DES 1a

### **1 - General Design**

Good design is a key aspect of sustainable development and the National Planning Policy Framework requires that robust and comprehensive local design policies are developed. Policy 10 of the Aligned Core Strategy sets out detailed objectives and criteria against which the design of new developments can be judged.

**Should we:**

Use Aligned Core Strategy Policy 10 as the basis but provide non-statutory guidance to developers about the character of different areas in the Borough?

**DES 1b**

**Please use this space to provide information in support of your response to DES 1a**

If ACS Policy 10 is adopted then it should be applied on the basis of consistency between neighbouring authorities. Non-statutory advice can be used to fine-tune the Policy to local circumstances.

**DES 1c**

An important part of design is the protection of amenity of surrounding uses. This is an important part of Policy ENV1 in the Replacement Local Plan. The National Planning Policy Framework identifies that impacts on health and quality of life are important elements of amenity.

We are looking to identify issues which could impact on amenity under the following areas:

- 1 From the built development - such as overshadowing or overbearing;
- 2 Generated by the development - such as noise or traffic;
- 3 On adjacent buildings - such as impact on renewable energy technologies.

**Please use this space to identify any issues you think should be included in an Amenity policy**

Amenity policy should include noise, traffic, overshadowing or overbearing as described. These are very important aspects when applied to rural parishes. Also within amenity should be included the protection of open space and agricultural land, wildlife habitats and biodiversity consistent with other parts of the policy being developed.

**DES 5a**

**5 - Live-Work and Self Build Homes**

The Framework requires that local planning authorities facilitate flexible working practices such as allowing business and homes to share the same building. One of the priorities identified for Gedling Borough in the Council Plan 2013/14 is to promote business and self-employment. Many self-employed people start by running their business from their own homes.

Planning policy can help facilitate this by ensuring that a proportion of new homes include the provision of rooms that can be used as offices or workshops or by allowing appropriate extensions to existing dwellings. Using a criteria based policy could ensure that any planning application is assessed in a consistent way. Alternatively a Local Development Order could remove the need for planning permission subject to the proposal according with certain parameters (such as height of the building, distance to boundary etc).

**Should we:**

**Require large sites to include a proportion of live work units?** Yes

**Establish a criteria based policy to assess the change of use and/or extensions to existing dwellings for business purposes?** Yes

**Establish a criteria based policy to assess the development of new live-work units?** Yes

**Use a Local Development Order to allow new live-work units in specified areas according with certain parameters without the need for planning permission?** No

#### DES 5b

The Framework requires that local authorities include provision for people to build their own homes if they wish. At present there is no specific policy for Gedling Borough that relates to this issue.

**Should we:**

**Require large housing sites to include a proportion of self-build plots?** Yes

**Establish a criteria based policy to assess self-build homes against?** Yes

**Use a Local Development Order to allow new self build housing in specified areas according with certain parameters without the need for planning permission.** No

#### ECON 1a

##### 1 - Employment Land Supply

The National Planning Policy Framework stresses the need to plan to accommodate new businesses. Policy 4 of the Aligned Core Strategy provides for 22,800 sq m of new office development in Gedling Borough and 10 hectares of industrial and warehousing land should also be available. Arnold town centre is identified as a location for offices and economic development including offices will also be promoted as part of the large urban extension planned at Top Wighay Farm.

National planning policies require that long term blanket protection of employment sites should be avoided. The Aligned Core Strategy allows for poor quality and unsuitable employment sites to be released.

The existing protected employment areas are shown on the Replacement Local Plan Proposals Map.

**Should we:** Release some or all of the sites for other uses (if so please specify which below)?

#### ECON 1b

**Please use this space to provide comments in support of your response to ECON 1a or any other comment you have regarding employment land.**

The Parish Councils are of the opinion that the evidence base does not justify the proposals for the extent of employment provision in the Borough of Gedling.

The ACS sets out a requirement for the Borough to find **22,800m<sup>2</sup>** of office floorspace (Use Class B1 (a) & (b)) and **10 hectares** of land for industrial and warehouse use (Use Class B1(c), B2 & B8). However, the more up to date evidence of the Office and Employment Provision Background Paper 2012 (CD/BACK/04) concludes that sufficient land is available to meet the anticipated demand for industrial and warehousing land over the plan period, based on the NCRELS study as updated (CD/KEY/3 - 5).

The Council has confirmed to the Parish Councils that 33 hectares of employment land is currently allocated in the extant Replacement Local Plan that has yet to be developed. The evidence suggests therefore that Gedling Borough has far more employment land allocations than is required to meet demand over the plan period. The Framework advises local planning authorities that their planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose

The Council's policy has been not to challenge the Local Plan Inspector's report of 2004 on a number of employment sites despite the fact that the report is almost 10 years old and the evidence base relating to the demand and supply of employment (and housing) land is now entirely different to that which existed at the time of the previous Local Plan Inquiry. As a result, the Council has undoubtedly under-estimated the scope for additional housing sites by not re-assessing some poorly located and poorer performing employment sites, including Bestwood Business Park.

The Council's reasoned justification for not re-assessing the employment allocation at Bestwood Business Park is that the site is protected under Policy E3 (of the extant Local Plan) and the decision to not release the site for housing was supported by the Local Plan Inspector. However, there is a far more recent evidence base (as set out in CD/KEY3-5 and CD/BACK/04) that indicates that there is an oversupply of employment land in Gedling and therefore the poorer employment sites should be released for housing.

In the case of Bestwood Business Park, the site owners (St Mowden Developments Ltd) are actively promoting the site for residential development, which is capable of accommodating 220 dwellings. This site is evidently suitable for housing, given its location in a sustainable position within the settlement and surrounded by complimentary uses, and there are no overriding constraints for its residential development.

The Parish Councils are of the opinion that there is the potential to secure a significant amount of new housing on existing sites allocated for employment use, which in turn would reduce the need to release greenfield sites in the countryside/Green Belt for development, in particular Top Wighay Farm and land North of Papplewick Lane.

### **ECON 3a**

#### **3 ? Employment in Rural Areas**

The National Planning Policy Framework requires that local authorities support economic growth in rural areas. This should include policies that facilitate growth and expansion of existing businesses. Emphasis is placed on the promotion and retention of local services in villages such as local shops. The Aligned Core Strategy also supports the diversification of the rural economy. The Aligned Core Strategy also identifies the key settlements of Bestwood, Calverton and Ravenshead for strategic levels of housing growth and for this to be sustainable some employment opportunities may be needed.

Currently Policy E9 of the Replacement Local Plan encourages small scale employment uses for traditional types of employment on new sites or through converted buildings within settlements which are excluded from the Green Belt.

**Should we:**

Continue with the existing policy approach as set out in Policy E9?

### **ECON 3b**

**Please use this space to provide comments in support of your response to ECON 3a.**

Economic development relies upon the availability of an appropriately skilled workforce to supply local trade markets and routes or regional specialist suppliers and services. In rural districts it is important to establish a policy framework that empowers the rural industry to embrace new technology and maximise the potential of existing productive land in a sustainable way that benefits the economy but also safeguards against over-development and negative impact upon rural identity and environment.

### **ECON 3c**

The National Planning Policy Framework places emphasis on the diversification of agricultural and other businesses and supporting sustainable rural tourism. In this context the Aligned Core Strategy notes the importance of agriculture in the rural areas and emphasises the need for further diversification of the rural economy locally.

**Please use this space to identify what should be included in a rural diversification policy and how this should be balanced against Green Belt policy?**

Rural diversification policy needs to allow for rural businesses to exploit their assets to best advantage where this can bring value to the business and local community. There must be clear and firm criteria governing what is allowed in terms of temporary structures and facilities associated with tourism and public participation activities for example ensuring that they are compatible with Green Belt policy and consistent with restrictions placed on other developments within those areas. Developments which significantly negatively alter the character of the landscape or are visually or noise intrusive must be covered by this policy.

**TC 7a**

**7 - Tourism**

There are a number of existing visitor attractions within Gedling Borough that are located outside of the urban areas. These include Newstead Abbey, Papplewick Pumping Station, Patchings Arts Centre and the country parks at Bestwood, Burnstump, Gedling Colliery and Newstead.

**Do we need specific policies to protect and guide the future diversification of these attractions?** No

**TC 7b**

**Please use this space to provide comments in support of your response to TC 7a**

Some of these sites sit within Green Belt and therefore subject to the relevant planning policy without need for further control. The long-term needs of the different sites vary, and in time needs of the population will change, local managers and communities involved with their management should be allowed to develop their own ideas. These generally have to be consistent with planning policy to gain approval, providing a degree of control.

**CON 3c**

Limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation is an important part of good design.

**Should we:**

**Have a criteria based policy for the use of lighting?** Yes

**CON 3d**

**Please use this space to make any comments in support of your response to CON 3c or any other comment regarding lighting.**

Criteria based approach to lighting can allow criteria to be developed which will allow the lighting needs of the area to be met but minimise the impact outside of the area. This is especially important where sites are being developed in rural areas, which bring large amounts of light impacting on natural day/night patterns. Additional light impacts on existing residents and their life choices but, very importantly, also impacts on wildlife and their habitats. Therefore light impacts from development close to designated habitat areas, for example SAC's and SINCS must be appropriate which is more likely to be achieved if tight controls are placed requiring a bespoke rather than standard approach.

**REG 1a**

**1 - Gedling Colliery/Chase Farm**

Gedling Colliery/Chase Farm is a major part brownfield site adjacent to the urban area. Redevelopment of the site is a priority for the Borough Council. However, due to the cost of necessary infrastructure, specifically the Gedling Access Road, the site is not currently financially viable and cannot be counted on to deliver housing during the plan period.

The Aligned Core Strategy identifies Gedling Colliery/Chase Farm as a regeneration site and allows for its redevelopment, should economic conditions improve and public funding may become available.

The Replacement Local Plan identifies the Gedling Colliery/Chase Farm site as suitable for 1100 homes, 6ha of employment land, a new community hub and a new district centre. This scheme will need to be updated to reflect the current situation.

**Please use this space to make any comments regarding how the Gedling Colliery/Chase Farm site can best be developed.**

The Gedling Colliery/Chase Farm site, at present, is merely included in the ACS as an " *area of future housing development* " with apparently no realistic opportunity for its development within the plan period [1] as a result of funding issues with the Gedling Access Road. On this basis, no housing numbers are attributed to the site and no timescales set out for its planned development.

However, significant recent developments regarding the funding and as a result the deliverability of the Gedling Access Road within the Plan Period have changed matters profoundly. It has recently been confirmed by the Council (in a letter to its own Councillors dated 10 September 2013) that the necessary funding for the Gedling Access Road has now been secured and as a result: -

*" there is now a real prospect that the road will be built...and the likelihood of the Gedling Colliery site being regenerated, with the new housing and employment opportunities this offers "*

This new evidence clearly has major implications on the spatial strategy for growth in Gedling, despite the Council's insistence to date that it does not. The Parish Councils are of the opinion that it inherently changes the position of the ACS, particularly in respect of the distribution and phasing of sites to be developed within Gedling Borough, and this needs to be reflected in the LPD.

The Parish Councils are also aware that part of the site is highly likely to be deliverable within the first five years of the Plan Period. We are aware that discussions have already taken place with public bodies and the Homes and Communities Agency with regards to the development of the site and an application for (part of) the Gedling Access Road is currently being considered by the Council. If the application is successful, it is predicted that a developer would be in a position to submit a planning application for 300 dwellings on part of the site in 2014/2015. The development of the remainder of the site, with funding now secured, is likely to follow thereon after.

In the above connection, it should be noted that the Gedling Colliery/Chase Farm site is capable of accommodating approximately 1,120 dwellings, 6 hectares of employment land, a new community hub and a new district centre. A further 800 dwellings are capable of being built on the Mapperley Golf Course Site (which appears in the SHLAA). The Council suggests in the LPD that the "Redevelopment of the site is a priority for the Borough Council" but this is neither reflected within the policies in the ACS or those within the LPD. The site should be allocated for development in the ACS and other less sustainable sites, including land at Top Wighay Farm and land North of Papplewick Lane, should be removed

## **HIS 1a**

### **1 - Gedling's Historic Environment**

The National Planning Policy Framework sets out that the contribution heritage assets make towards their environment should be identified. 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 include the industrial and commercial heritage and the literary heritage. The Aligned Core Strategy sets out that elements of a more localised value will be identified in local development documents.

**Please use this space to identify any elements of the historic environment of Gedling Borough that should be identified in the Local Planning Document?**

The Parish Councils are of the opinion that the Historical significance of the cotton mill industry and technological advances in steam associated with the River Leen should be identified within the LPD. The archive and remaining physical traces associated to this area are of national, regional and local significance in terms of industrial development prior to the establishment of coal mining. Framework Knitting (for example in Linby and Calverton), Worsted Spinning (for example in Arnold), Iron Working (for example in Bestwood) and later, the more significant contribution to the landscape made by mining.

The course of the River Leen provides a tangible link between the cotton industry of Hucknall, the Lace Market area of Nottingham and the River Trent and effectively ties that heritage into the Green Infrastructure and ecology associated with the River.

Pressure upon land to accommodate further urban development threatens the survival of some of these older historical traces that pre-date the coal mining history of the area.

## HIS 2a

### 2 - Locally Listed Assets

The Framework requires that the significance of 'non-designated assets' be taken into account when making planning decisions. These are heritage assets which do not meet the criteria to be formally protected but are important in a local context. In order to provide a degree of certainty as to where these assets are they can be identified through the planning process.

**Do you agree that the Borough Council should identify a local list of heritage assets?** Yes

## HIS 2b

If it is decided to have a local list of heritage assets there will need to be a policy to use to assess development proposals. In line with the Framework this will need to balance the effect and benefits of the proposal.

**Please use this space to make any comments you have about what this policy should include or any other comments you have about the issue of locally listed heritage assets.**

Policy associated with locally listed assets 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.
- Ensure proposals for change are reasonable, transparent and consistent with relevant established policy and best practice.

## HIS 3a

**3 - Development affecting Designated Heritage Assets** Listed buildings, scheduled monuments, conservation areas and Registered Parks and Gardens have been formally identified because of their historic significance. The Replacement Local Plan includes policies that set out how these are to be protected when development is proposed. The National Planning Policy Framework also sets out how to assess impact on designated heritage assets and how to balance the harm and benefits of proposals.

**Should we include policies on development affecting designated assets?** Yes ? policies required for designated assets

## HIS 3b

**Please use this space to provide information about what such policies should include or any other comments you have about this issue.**

Policy associated with designated assets should seek to:

- Strengthen (where relevant) the evidential, communal and aesthetical value of local heritage assets by:
  - . Maintaining an effective record of links with local heritage.
  - . Ensuring the accessibility of records and sites to everyone.
  - . Protecting the interests of local heritage where development or change could negatively influence the value of assets.
- Strengthen the regional and national context of heritage asset through the establishment of connections with other relevant evidential records. The establishment of a Sherwood Regional Park would be welcomed in this context.

## HIS 4

**Please use this space to identify any matters related to the Historic Environment not covered here or elsewhere.**

The development of any local policy regarding heritage should seek to incorporate the established principles and policy of existing governing agencies and statutory consultee's (English Heritage [1], County Council & Borough Council Conservation teams) and advocate established best practice in the identification, evaluation and protection of heritage assets.

[1] 'Conservation Principles'; Policies and Guidance for the sustainable management of the historic environment - **English Heritage - 2008.**

## GI 1a

### 1 - Parks and Open Space

The National Planning Policy Framework highlights that access to high quality open spaces can make an important contribution to the health and well being of communities. Existing open space should not be built on unless the space is no longer needed, an equivalent facility is provided elsewhere or it will be redeveloped into another form of open space. Policy 16 of the Aligned Core Strategy sets out that a strategic approach to Green Infrastructure will be taken and looks to protect parks and open space.

It is proposed to identify and protect the following types of open space:

- 1 Parks and Country Parks
- 2 School playing fields
- 3 Allotments
- 4 Sports pitches.
- 5 Amenity space
- 6 Golf Courses

The current extent of these can be seen on the Replacement Local Plan Proposals Map ([link](#))

**Please use this space to identify any further types of open space which should be identified and protected. Please also use this space to identify any changes which are needed to the areas identified on the Replacement Local Plan Proposals Map.**

The Parish Councils acknowledge that there is currently an under provision of locally accessible Green open space in accordance with objective 4 of the replacement local plan.

- Policy R1 (Para 7.15) Outlines the requirement for suitable provision to meet catchment needs (in accordance with Recreation objective 4 of the Replacement Strategy) and draws attention to the existing deficit in provision to numerous areas across the district, including Linby and Papplewick.
- It is important to acknowledge that the Linby and Papplewick parishes sit on the edge of the Ashfield administrative boundary and there is concern that Open space within the adjoining area is also below threshold for the adjacent catchment.
- There is a clear need for new Public open space to be identified and defined and to be accessible between the shared catchment of the villages of Linby, Papplewick and the urban fringe of Hucknall.
- The development of new green open space on the urban fringe would serve to meet the objectives set out in Nottinghamshire County Council's Landscape Character assessment of the Linby Wooded

Farmlands (LDU 358) and the River Leen Corridor (LDU 451) by strengthening the rural character of these areas and further filtering of the views of the urban fringe of Hucknall. The proposed development area at Bestwood significantly affects the latter, which is located in an elevated position dominating the Leen Valley.

### GI 1b

The Framework and the Aligned Core Strategy (notably Policy 16) identify a number of tests against which proposals affecting green infrastructure will be assessed against.

#### Are any further local criteria needed?

Yes ? further criteria needed (please specify what below)

### GI 1c

#### Please use this space to provide information in support of your response to GI 1b.

The Parish Councils share concern regarding irregularities proposed under the ACS and LDP with regard to the reasons outlined below:

- . The requirement for public open space is directly proportional to the density of development and Population. The NPPF and Gedling Strategic Housing Land Availability Assessment have now superseded the Regional Spatial Strategy and Urban Housing Capacity Studies that have fed into the current proposal for the Aligned Core Strategy and LDP.
- . In order to meet with the principles of the Localism Act, there needs to be a clear definition of new policy for the integration of existing Green infrastructure asset within the shared catchments of the Linby, Papplewick and Hucknall urban fringe. In order that new development requirements are to be met in a balanced and sustainable manner.

### GI 1d

The Framework allows for the identification of 'Local Green Spaces' by local communities. Local Green Spaces are areas which are of particular importance to a local community. They must:

- 1 Be consistent with the local planning of sustainable development Compliment investment in sufficient homes, jobs and other essential services
- 2 Only be designated when a plan is being prepared or reviewed
- 3 Be capable of enduring beyond the plan period
- 4 Be reasonably close to the community
- 5 Be demonstrably special to a local community and hold a particular local significance
- 6 Be local in character and not an extensive tract of land

Policies for managing development within a Local Green Space should be consistent with the policy for Green Belts.

#### Please use this space to identify any opportunities for the designation of Local Green Spaces and what a policy should include.

The Parish Councils are the opinion that Land north of Papplewick Lane comprising the site of Walk Mill Pond and the woodland known collectively as Moor Pond Woods should be recognised as contiguous with the land south of Papplewick lane to the rear of Grange Cottages (which falls into Ashfield District and is scheduled to become public open space as the Grange Farm site is developed) and should be identified as public open space in the interest of the further integration of the Moor Pond wood into the adjoining urban area.

Policy needs to:

- . Recognise the value of separation where existing Green Infrastructure provides effective buffer between the conflicting needs of urban development and rural enhancement.
- . Identify and enhance connectivity to the benefit of as wide a community or catchment as possible.
- . Establish management plans that safeguard and improve biological diversity in the interest of nature conservation and amenity.
- . Safeguard against negative impacts upon areas sensitive to flooding or the effects of flooding.

- . Actively address the recreational and educational needs in terms of safeguarding access and the provision of amenity features that meet the needs of as wide a cross section of the community as possible.

## GI 1e

### **Please use this space to make any other comments regarding parks and open space.**

The Parish Councils are of the opinion that the Green Infrastructure / parks and open space policy would need to acknowledge the needs of the wider urban fringe of Hucknall due to the proximity with the Ashfield district.

The development of a pro-active approach to GI planning should be established with the aim of identifying where ecological, historical, recreational and environmental assets interface, with a view to the establishment of a strategy that maximises the opportunity to develop better connection with the environment of the borough and building on the health and wellbeing and looking at the regional tourism potential

The Landscape Institute recently produced a Position statement on Green Infrastructure which effectively demonstrates how the establishment of a GI network unlocks the potential for wider economic returns and improves health and wellbeing within the population.

## GI 2a

### **2 - Woodland**

The National Planning Policy Framework includes a presumption against the loss or deterioration of habitats such as Ancient Woodland and veteran trees unless the need for and benefits of development outweigh the loss. The Replacement Local Plan Proposals Map identifies a number of Ancient Woodlands in Gedling Borough. So far no veteran trees have been identified.

### **Please use this space to identify any other Ancient Woodlands or any veteran trees which should be included on the Local Planning Document Policies Map. Please also use this space to identify if you think extra local policies are needed.**

The Parish Councils are of the opinion that County Council and Borough records should effectively document areas of Ancient woodland and veteran trees.

The local contribution that Moor Pond Wood makes should be recognised as a Proposed LNR in accordance with policy ENV36 (Para1.85) for the following reasons:

- . Wet woodland is rare in Nottinghamshire.
- . ENV36 recognises the importance of the Public's enjoyment of open space in terms of conservation designations.
- . The site used by schools, scouts etc. for learning and conservation projects.
- . Open space on outskirts of Hucknall used by residents of the urban area for recreation and exercise on a regular basis.
- . The same may apply to other areas not identified in the LDP, for example Freckland wood is a designated special bird protection area

## GI 2b

Community Forests aim to create large areas of multi-purpose woodland, heath and open land in urban-fringe areas. The Greenwood Community Forest covers 161 square miles of Nottinghamshire, from Mansfield in the north to Nottingham in the south and from Eastwood in the west to Farnsfield in the east. It joins historic Sherwood Forest in the north-east and curves round to Attenborough in the south-west.

Policy 16 of the Aligned Core Strategy identifies the Greenwood Community Forest as an important part of the strategic network of green infrastructure. Currently Policy ENV43 of the Replacement Local Plan requires that the Borough Council negotiate with developers to secure new trees or woodland as part of development within the defined Greenwood Community Forest. Policy R7 identifies a number of criteria against which development proposals will be tested.

**Should we:**

Continue with this approach?

### **GI 2c**

**Please use this space to provide information in support of your response to GI 2b or any other comment you wish to make about the Greenwood Community Forest.**

The Parish Councils are of the opinion that the Local Plan should recognise the contribution of the Greenwood Community Forest, and support the development of patchwork woodland in the district.

Moor Pond Wood forms part of a continuous tree canopy that links into local mature woodland associated with the Ravenshead MLA and the conservation areas associated with it.

### **GI 2d**

Sherwood Forest is internationally renowned for the beauty of its landscape, its exceptional biodiversity and its historical importance, with links to royalty and legends. It is inextricably associated with Robin Hood and stands as one of the most iconic landscapes in the world. It is also a working landscape with productive farmland, commercial forestry, thriving communities and a long history of mineral extraction and coal mining. Sherwood Forest is a major asset for the people of Nottinghamshire, and a significant tourist and visitor destination.

There are currently proposals to create a Sherwood Forest Regional Park, and Gedling Borough Council is part of the Board steering the proposals. The objectives of the Regional Park are to manage, enhance and promote the landscape and historic character of the forest, promote sustainable leisure and tourism and support agricultural diversification, woodland and rural economy uses which respect local character. The proposed boundary of the park can be seen on the map in Appendix 1.

**Should we:**

Identify the boundary and include a policy supporting development that accords with the objectives of the Regional Park?

### **GI 2e**

**Please use this space to make any comments in support of your response to GI 2d or any other comment you have regarding Sherwood Forest.**

In response to the development of a Sherwood Regional Park it would be desirable to establish policy to ensure that community woodlands and parks under the management of Parishes were managed in such a way as to strengthen the character of the area in the interests of sustainability and amenity.

### **GI 3a**

#### **3 - Conservation Sites**

National planning policy requires that the natural environment is enhanced by minimising impacts on biodiversity and contributing to halting the decline in biodiversity by establishing ecological networks. Criteria based policies should be established to assess development against and distinctions should be made between sites of international, national and local value.

There are no international designations in place in Gedling Borough. Work is being undertaken to establish whether parts of the north of the Borough should be included within a 'Special Protection Area'. This would protect the habitats of Woodlarks and Nightjars. Work is at a very early stage and the outcome is not certain. We are required to take a cautious approach and to consider the impact of the proposals on the Special Protection Area as if it was to come into force.

There is one national designation - a Site of Special Scientific Interest at Quarry Banks near Linby. This will be identified on the Policy Map but as there is separate legislation in place to protect this type of designation there is no need for additional policy.

**Please use this space to identify how the Special Protection Area should be addressed in the Local Planning Document?**

The Parish Councils are of the opinion that the diversity of the Moor Pond Wood and River Leen should also be further protected for the contribution it makes in terms of wildlife and in recognition of water quality for following reasons:

- . In order to Protect cleanliness of Leen for scheduled species such as White-clawed Crayfish, water vole and Brook Lamprey from source through Bestwood
- . To protect rare species identified in Moor Pond Wood including Red Back Spider

**GI 3b**

Local Wildlife Sites (previously known as Sites of Importance for Nature Conservation or SINC)s and Regionally Important Geological and Geomorphologic Sites (RIGS)s are local sites which have been identified after an assessment process and meet minimum criteria. A map showing the current designated SINC)s and RIGS)s can be found at Appendix 1. In order to assess planning applications which affect these sites we will require a criteria based policy. Currently ENV36 of the Replacement Local Plan applies. This gives consideration to the need for the development and the local ecological and community value of the site.

**Should we:** Continue with the current approach?

**GI 3c**

**Please use this to provide information in support of your response to GI 3b or any other comment you have regarding local conservation sites.**

The Parish Councils are of the opinion that the district plan should include policy necessary to conform to the requirements of the NPPF by

- . Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.
- . Recognising change by affording suitable protection to emerging habitats in the interest of biological diversity and quality of local environment.
- . Actively supporting the establishment of Local Nature Reserves in the interest of protecting habitat and species diversity as well as local amenity.

References:

- . Natural England guidance: *Local Nature Reserves in England: A guide to their selection and declaration (NE301)*
- . Landscape Institute Position Statement: *Green Infrastructure - An integrated approach to Land use.*

**GI 4a**

**4 - Landscapes**

The National Planning Policy Framework allows for 'locally valued' landscapes to be protected using criteria based policies. Currently a number of Mature Landscape Areas have been identified in the Borough. These are shown on the Proposals Map. The Landscape Character Assessment is up to date evidence of the strength and character of the landscapes in Gedling Borough. It identifies how new development can be accommodated within the landscapes. Development within them is assessed against Policy ENV37 of the Replacement Local Plan.

**Should we:** Use the guidance in the Landscape Character Assessment to develop policy?

**GI 4b**

**Please use this space to provide any information in support of your response to GI 4a.**

The Parish Councils are of the opinion that Landscape Character Assessment effectively addresses the balance when evaluating the need for development and the capacity of a given area to accommodate change within a strategic and local context.

#### **GI 4c**

A number of key ridgelines are also identified in order to protect the open character and visual quality of the area. The aim is to ensure that development is contained and does not spill over the ridgelines into areas that would result in an increase in the need to travel by car.

**Should we:** Continue to identify and protect the ridgelines

#### **GI 4d**

#### **Please use this space to provide any information in support of your response to GI 4c**

By utilising LCA as a means of developing policy, the topographical character of the district and the identification of significant woodland features, that help define localised character are more effectively safeguarded.

#### **GI 5**

#### **Please use this space to identify any matters related to Green Infrastructure which are not covered here or elsewhere.**

The Parish Councils would like to draw attention to recent changes in legislation (Localism Act and retraction of Regional Planning Statements) that impact upon the current proposals for the ACS and LDP.

Without review, if existing targets within the ACS are implemented this could pose a risk to existing GI assets resulting in further fragmentation and lack of integration between development and the local needs of community. It is with this in mind that the proposals are considered unsustainable.

#### **TRAN 3a**

##### **3 - General Transport Policy**

The National Planning Policy Framework sets out a number of tests related to accessibility, highway safety and the sustainable transport system. Policies 14 and 15 of the Aligned Core Strategy set out the approach that will be taken to transport issues and identify a number of schemes that will be needed in the Greater Nottingham area. It is considered that no additional policy is needed at a local level.

**Do you agree that no local policy is needed?** No - local policy needed (please state what below)

#### **TRAN 3b**

#### **Please use this space to make any comments in support of your response to TRAN 3a or any other comments you have regarding transport issues**

Local policy, aligned with neighbouring authorities is required because the existing road network is struggling to cope at peak times as highlighted in the Traffic Surveys presented by the Parish Councils with their response to the ACS Consultation. An approach based on local need and circumstance is required rather than that of the NPPF. Policy 15 states no committed funding to GAR - misleading

#### **TRAN 4a**

##### **4 - Transport Routes**

A number of routes are safeguarded in the Replacement Local Plan for use as part of future transport schemes. These include former rail lines which are no longer in use but which could be brought back into active use.

**Should we:**

Continue to identify and protect future transport routes

**TRAN 4b**

**Please use this space to identify any transport routes in addition to those identified on the Replacement Local Plan Proposals Map which should be protected. Please also use this space to provide any other comments in support of your response to TRAN 4a**

Part of the transport problems we have today are a result of the loss of former routes, which could have provided solutions. Future needs may be different from ours, and new development will mean different transport needs for people, goods and services. New routes should be continuously sought and explored including those that may not immediately be obvious or emerge over time.

**GEN 1**

**Please use this space to identify any topics or issues which you consider need to be covered by the Local Planning Document but which are not addressed elsewhere in this document.**

Protection of areas of woodland in Linby Village. Within the Linby Conservation area, areas containing mature trees such as the 'Plantation' or the area of trees to the north of Linby House all make valuable contributions to the look and feel of the village. Whilst it is accepted that many of these trees are now old or diseased, once removed another tree should be planted in its place. At present once these trees are lost, the land underneath is often grassed over and becomes part of an extended lawn and then the opportunity to replace this section of the woodland is lost. Where existing trees do come down or are removed for reasons of health and safety, replacement trees should be planted. Policy ENV15 (d) - New Development in Conservation Areas - There should be an addition in the existing policy text to recognise the importance played by stone boundary walls in Linby and Papplewick village, which should be protected against demolition and also lamp columns which presently are the cast iron Victorian style. Should these eventually require replacement it would not be appropriate to replace these with standard lighting.

**GEN 2**

**How did you respond to this document?**

Using the online tool

**GEN 4**

**How did you find out about the consultation on this document?**

Letter from GBC