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F.A.O: Kevin Cartwright
Planning
Gedling Borough Council
Civic Centre
Arnot Hill Park
Arnold
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9th June 2022

Dear Kevin,

**Town and Country Planning Act 1990
Land off Hayden Lane, Full planning permission for 135 dwellings with access from Delia Avenue and Dorothy Avenue, Application Reference 2022/0501.**

Urban Vision Enterprise CIC has been appointed by Linby Parish Council (LPC) to submit representations with regard to the above application 2022/0501.

The principle of development is already established through the Local Plan (Part 2) site allocation. LPC supports the principle of residential development, but the scheme as submitted has significant deficiencies which need to be addressed.

Green Infrastructure, Biodiversity and Design

Chapter 8 of the NPPF deals with promoting healthy and safe communities and Paragraph 92 encourages the provision of safe and accessible green infrastructure to support healthy lifestyles. The National Design Guide 2021 provides more detailed guidance on green infrastructure.

The indicative masterplan does not provide green infrastructure as an integral part of the layout. It fails to use green infrastructure to link to surrounding development. It proposes grassing for left-over pieces of land. The requirements of the NPPF and National design Guide have clearly not been met.

Policies 1 and 17 of the Greater Nottingham Aligned Core Strategy (Part 1 Local Plan) (adopted September 2014) deal with Climate Change and biodiversity. The development does not include new areas of biodiversity value or contribute to biodiversity net-gain or support wildlife. The proposed dwelling types do not provide a positive response in terms of materials, orientation, or onsite renewable energy to address climate change. The scheme ignores Policies 1 and 17 of the GNACS.

The proposal makes a positive contribution to the policy requirements of LPD4 Surface Water Management of the Gedling Borough Council Local Planning Document (Part 2 Local Plan) (adopted July 2018), by creating a SuDS system. However, this could be better designed to contribute to the amenity and biodiversity of the area.

Policy LPD21 Provision of New Open Space, requires minimum 10% open space provision. The green areas proposed are poorly design and of little value to the community (amenity, recreation, movement).

Policy DES1 Design of the Linby Neighbourhood Plan 2018-32 supports the integration of permeable surfaces and SuDS within development. Clause 3 makes clear that development should not result in on-street parking unless well-designed into the street.

LPC support the positive design approach in retaining the established mature hedgerows on the edge of the settlement in line with policy NE1 Habitats, Trees and Hedgerows. Retaining these features also positively meets policy NE2 Landscape and Rural Character, maintaining a softer transition into the open countryside. This is further supported with gardens orientated towards the edge of settlement.

Housing Mix

The strategic allocation was made with an indicative figure of 120 units, providing 36 affordable homes within the site. The application is for 135 units, creating only an additional 4 affordable homes (40 in total). Although there are disparities in the planning statement about the number of proposed affordable homes, indicating 40 (para 6.14) and 38 (para 6.17). This needs clarification.

Policy LPD 37 Housing Type, Size and Tenure of the Gedling Borough Council Local Planning Document (Part 2 Local Plan) makes clear that permission will be granted for an appropriate mix of housing subject to housing need and demographic context. There is no evidence to support the type and mix calculations in the proposed development.

Policy HSG1 Housing mix of the Linby Neighbourhood Plan states:

“The proportions of different house types must be based on evidence of local housing need and this will need to be demonstrated as part of any planning application.”

There is no supporting housing need assessment to justify the type and mix or to demonstrate how the requirements of the policy have been addressed. Only 21 units suitable for smaller-family homes (1 and 2-bed) or first-time buyers or for older people or vulnerable or disabled are provided (15% of the total units).

The proposed development also fails the criteria to deliver a tenure blind development. The illustrative masterplan clearly shows the concentration of affordable units together on the site.

No case has been made to support the higher density development. There is no assessment of the culminative impacts of the strategic sites.

Transport and Active Travel

Chapter 9 of the NPPF deals with promoting sustainable transport. The provision to support active travel within the design of the development is poor.

Policy TRA1 Traffic and Transport of the Neighbourhood Plan requires development to incorporate EV charging points and secure covered cycle storage. These are not delivered in the proposed development.

The properties with integrated garages appear to be of a standard width (house types D, F and J), failing to take account of the size of modern vehicles, so are not fit-for-purpose. This is likely to lead to on-street parking.

In relation to the capacity of the main highway network to accommodate traffic movements generated by the development, it is essential to consider cumulative impacts with other recent permissions and strategic sites.

Conclusions

The scheme fails to meet the requirements of national policy and guidance and of several policies in the statutory development plan. Deficiencies of the scheme include poor design, poor green infrastructure, housing mix and transport provisions.

For Linby Parish the statutory development plan comprises the Greater Nottingham Aligned Core Strategy, Gedling Borough Council Local Planning Document and Linby Neighbourhood Development Plan.

Section 38 of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.

Given the clear failings to meet the requirements of policies in the statutory development plan and of the NPPF and National design Guide, we do not consider that this scheme could be supported.

Yours faithfully

A handwritten signature in black ink, appearing to read 'HAB', is positioned below the 'Yours faithfully' text.

Hannah Barter
Director / Partner