

SUPPLEMENTARY PLANNING  
DOCUMENT

# The Park Conservation Area Appraisal & Management Plan



March 2023

## Report of Consultation



Nottingham  
City Council

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## **1.0 Purpose of the SPD**

- 1.1 The Park Conservation Area Appraisal and Management Plan SPD has been prepared to guide development proposals and the ongoing management of The Park Conservation Area. The document provides an in-depth analysis of the area's historic and architectural significance as a heritage asset, gives guidelines for the assessment of new development proposals, and sets out a strategy and proposals for its future management.

## **2.0 Persons/bodies/groups consulted**

- 2.1 Consultation has been undertaken with statutory bodies, local businesses, citizens, agents and developers, wider interest groups and stakeholders, local councillors, and Nottingham City Council officers. E-mails/letters providing details of the consultation were sent to all contacts on the Local Plan database of consultees (Inovem).

## **3.0 Ways in which consultation was undertaken**

- 3.1 In line with the City Council's Interim Statement of Community Involvement (2020) consultation was undertaken online, with the document being available to view and download from the City Council's web site. It was also available for inspection at the City Council offices.
- 3.2 Comments on the draft document were invited for an 8-week period ending 16 November 2022.
- 3.3 A public meeting was held on 7 November 2022 (6.30pm) at The Park Tennis Club. This was attended by 35-40 people. The purpose of the meeting was to give an opportunity to discuss the draft SPD and to make comments. The meeting was facilitated by consultants from Locus, with a Team Leader from the City Council's planning team also in attendance. The Locus Consultancy has been now been taken over by Marrons Planning who completed the work on the SPD.

## **4.0 Representations**

- 4.1 There were 38 respondees in total. All comments have been considered and a number of amendments to the draft SPD have been made as a result.
- 4.2 Appendix 1 sets out a summary of the comments made and the City Council's responses to them, together with any recommended changes to the document.

## **5.0 Sustainability Appraisal**

- 5.1 Undertaking a Sustainability Appraisal (SA) is a statutory requirement/ process, which must be undertaken for any new planning document in accordance with the Planning and Compulsory Purchase Act (2004). The purpose of an SA is to assess the economic, social and environmental impacts of projects, strategies or

plans, so that the preferred option promotes, rather than inhibits sustainable development. In addition to an SA, European directive 2001/42/EC (commonly referred to as Strategic Environmental Assessment or SEA), requires that Local Authorities undertake an “environmental assessment” of any plans and programmes they prepare that are likely to have a significant effect upon the environment.

- 5.2 The requirements of the SEA have been incorporated into the SA for the Local Plan Part 2 – 2020 (LAPP). The process appraised social, environmental and economic effects. It was undertaken from the start of the LAPP process and through its various preparation stages. In doing so it ensured that the decisions made on policies contributed to achieving sustainable development. Furthermore, the SA recommended some changes to ensure that the LAPP was as sustainable as possible. The SA has facilitated the evaluation of alternatives and also considered the cumulative, synergistic and secondary impacts of the LAPP policies and sites.
- 5.3 The SA also demonstrated that the Plan was an appropriate approach when considering reasonable alternatives and, where negative impacts were found, suggested mitigation measures overcome them. Monitoring arrangements were also proposed to ensure that the impact of the policies can be properly evaluated. Accordingly, as an SA was undertaken on the LAPP, a separate SA is not required for this document.
- 5.4 Full details of the SA process, and methodology can be found at [www.nottinghamcity.gov.uk/localplan](http://www.nottinghamcity.gov.uk/localplan).

## Appendix 1: Summary of comments, City Council responses and amendments

Organisation	Comments received	City Council response and amendments
Ashfield District Council	The Council's Planning Policy and Development Management Sections have no comments to make on the proposed 'Draft Park Conservation Area Appraisal and Management Plan SPD'.	No action.
Individual	In theory the Park Conservation Area Appraisal & Management Plan has good intentions provided: 1. The proposed rules, in particular those relating to landscaping, hardscaping and management of green spaces should also apply to The Park Estates management of the roads, green spaces etc under the ownership of the company (managed on behalf of the residents). All too often The Park Estate use tarmac and concrete as a favoured material, choosing to throw away original curb stones (sandstone) and cover up original surfaces with tarmac. 2. The Park Estate shouldn't be given any powers to interoperate or administer local planning policy, it is not a planning authority or local authority, and doesn't have the skill set to interoperate and apply planning policy. Page 84 of the proposed document "Proportionate to the nature of the proposals, applications must demonstrate a degree of consultation with relevant parties, including residents, the local planning authority and the Nottingham Park Conservation Trust." Disagree with this; consultation should remain with the local authority's planning department.	No changes made. The statement says that consultation with the Trust will be proportionate to the development proposed and as a stakeholder within the area concerned with the historic character for The Park this is entirely legitimate. The decision-making powers on formal applications will still ultimately lie with the LPA.
Individual	There is a factual error on page 20. Valley House is described as an eight-storey building, whereas it is in fact only seven storeys.	Corrected.
The Coal Authority	Confirm that the Planning team at the Coal Authority have no specific comments to make on this consultation document.	No action.

<p>The Park Tennis Club</p>	<p>Concerns around how the word 'enhance' would be interpreted for the Club's facilities, given there are tennis courts as well as an Edwardian pavilion. For example, the recent installation of LED Floodlights have 'enhanced' the playability of courts in Autumn and Winter, providing opportunities for exercise into the evening. This provision will help the Club to be financially sustainable with the resources to maintain the whole club. Uncertain whether the SPD, as written, would allow us to move with the times and permit the installation of these energy efficient floodlights. Provision for technological developments that the Victorian's did not envisage such as EV's and Floodlights should be clarified.</p> <p>The specific guidance for energy efficiency measures would be helpful. For example, should the club or a home be considering changing the windows from single glazing to double glazing, or solar panels etc. how specific would guidance be? Would the Club be permitted to install UPVC windows if they were of suitable design etc?</p>	<p>Installation of floodlighting would need to be determined as a part of a planning application and assessed on its merits by balancing impact on the Core Elements against public benefits. The SPD should not stand in the way of appropriate development that enhances existing buildings and community facilities for the benefit of residents.</p> <p>Agreed. Reference to be made to Historic England best practice.</p>
<p>Individual</p>	<p>Curious how the guidance on how eclectic modern buildings are 'preserved and enhanced' in The Park would be communicated when these houses are already different and often unique. How are they to be assessed? What kind of 'enhancement' would be allowed and what would be rejected?</p> <p>Property wrongly categorised on the plans as an original building but was in fact built in 1991.</p>	<p>Changes to post 1918 properties would all need to be individually considered in light of their contribution to the Park's five Core Elements and how any changes might impact on these. For a property constructed from poor quality materials for example, it may be appropriate to allow its re-facing with a more sympathetic material. A good example of this is 2 Ogle Drive.</p> <p>Noted. Correction made in document.</p>
<p>Individual</p>	<p>Ensure that proposals will preserve and enhance depends on interpretation of the content of the new plan. This will take time and scrutiny of the application. It is bound sometimes to be susceptible to individual opinion. It should help considerably but is unlikely to ensure in every case.</p>	<p>Agree that planning can be a subjective exercise, but this document aims to provide a framework for determination of applications that can be applied across the board.</p>

	A very useful update and revision of status should help considerably to assess applications.	Noted.
Individual	Important to emphasise both the architecture (well documented) but also the open spaces. The street scene with the many tree lined roads and views not just from the Castle but across the bowl in both directions add a unique character to The Park.	Text added to p30 and p35. Page 35 does describe the value of the open space in terms of views and openness already and by including them as a key contributor to Core Element I: Landscape - Layout, Grain and Open Spaces, the SPD recognises their sensitivity and value.
Individual	This is a key heritage site and would like to see the prevention of further damage to it.  The contribution of the green area and the trees to the city air quality is also to be noted and included in the plan by ensuring further destruction of trees be avoided.	Additional references have been added to trees in the introductory sections and the text to Core Elements I and II. Trees are now mentioned in all five of the Core Elements summary boxes. Added text in the section on Works Requiring Permission, to refer to the need for formal notification for all works to trees over 75mm in stem diameter.
Individual	The draft document is very interesting and encouraging. Whilst it would be wrong to expect The Park to stand still, it is important that the effects of any future developments should be carefully considered in relation to the character of this very special residential area. Also, it is important to maintain high standards for residents to ensure that the area maintains its popularity as a good place to live. The early history of the area and the castle, and the initial residential developments to be particularly interesting. Thank you for all the effort that has gone into preparing this.	Support noted.
Individual	Please ensure that process to achieve Supplementary Planning Document status is progressed with all possible speed in case it is needed to relate to damaging applications.	Noted.

	Correction to Page 20, 2nd para, 3rd line - Add "more" after "construction of one or..."	Correction made.
Individual	<p>Disagree with the following from the document: 1. Light spill onto gas lit streets from accommodation and security lights - has a positive overriding impact on safety. 2. Disagree with mentioning rooflights as a detrimental minor work and believe this should be removed.</p> <p>1. The SPD/CAAMP is generally a positive move which allows for opportunities to revert post-1918 subdivided plots with buildings with neutral or poor contribution, substantial change or limited to no architectural/historical interest to be reverted to the original TC Hine era architecture. However, it is going to make applying for planning permission significantly more expensive, as when applying for planning permission one will essentially now need to additionally employ a Heritage Consultant. Having lived in The Park since 2008, the character of and life within the Park have both significantly improved, even without an SPD. This is probably due to increasing gentrification.</p> <p>2. Page 44 states 'The increasing prevalence of security lights is similarly detrimental'. Disagree, the security lighting improves safety and security of the area and very often is only on temporarily as it tends to be triggered by motion detection. The extremely beautiful yet woefully inadequate and dark street lighting must be quite dangerous for the elderly and disabled, particularly when the streets are covered by autumn leaves. Light spill has a positive impact on the surroundings in the Park providing safe adequate lighting. All references relating to the negative impact of increased light emissions during the hours between dusk and dawn should be removed from the CAAMP.</p>	<p>This comment is given in the context of the impact on the characteristic gas lit street scenes which contribute positively to the Park's distinctiveness. While light spill may improve safety in localised spots and is not strictly controlled by the need for planning permission, to encourage widespread light spill would be inappropriate and harmful to the distinctive gas lit street scenes. A balance needs to be struck between preserving the character of gas lit streets and public safety. Ultimately this is a decision for the Park Estate who are responsible for the management of the highway infrastructure. Rooflights can and have had a detrimental impact on some of the Park's more architecturally distinguished properties but may be perfectly acceptable on others. Where planning permission is formally required for rooflights their impact will need to be individually assessed.</p>

	<ol style="list-style-type: none"> <li>3. The conversion of garages and coach houses to residential space, when undertaken sensitively has a massive positive impact on the street scene.</li> <li>4. The conversion of gardens to off-street parking has a massive positive impact to the character of roads, significantly decreasing on-street parking. Conversely, areas singled out as having crowded on-street parking are the smaller subdivided plots with no off-street parking. Off street parking should be encouraged, with sensitive, planting/design/landscaping of off-street parking areas.</li> <li>5. The CAAMP needs a section guiding electric on street charging.</li> <li>6. Page 27 - How come integrity of the Park Sports Club is green on the townscape planning? Surely it should be at least amber?</li> <li>7. The use and conversion of properties in The Park to HMOs should be resisted. Where possible the CAAMP should encourage the reversion of subdivided original estate houses (into flats) to their original single use state.</li> <li>8. A section should be included in the CAAMP on new technologies, such as solar panels and air source/ground source heat pumps.</li> </ol>	
Nottingham Action Group on HMOs	<p>a) 'The Conservation Area Status of the Park ...': As has been seen elsewhere, the impact of over-intensification of developments, such as subdivision of homes and creation of HMOs is clearly detrimental to the character and ambiance of an area. Examples of this are economic pressure for extensions to increase occupancy levels of HMOs in particular and other rented accommodation, replacement of gardens by vehicle hard standing and the removal of trees, shrubs and hedges with the aim of reducing the need, and expense of proper maintenance. All of these, and others not mentioned here, combine to damage the</p>	Works to facilitate the conversion of single dwellings into flats and HMOs is mentioned as a harmful impact in DPG5: Changes of Use of the document.

	<p>character of the area, in this instance, in terms of its conservation value.</p> <p>b) 'The proposal to elevate the Conservation Area ...': The Nottingham Action Group on HMOs strongly supports this proposal. SPD status, which will more clearly link the Plan to formal planning policy processes, would strengthen the case with a planning inspector to uphold refusal of a planning application should this be taken to appeal. This would be particularly important with respect to tackling over-intensification, HMO conversions, etc.</p> <p>c) 'Park Development Guidance ... enhance the ...': There is certainly no reason to suppose that this can be anything other than a beneficial development and, as such, should be supported.</p> <p>With special reference to conservation areas in other parts of the city, it is unfortunate that neighbourhoods in these areas (Arboretum, Wollaton Park, Old Lenton for example) have been unable to prevent erosion of their intrinsic characters through the desire to convert properties into HMOs and intensify occupancy levels (extensions, loft conversions, dormer windows, roof lights, etc.). Also noted the potential future challenge to the character of a neighbourhood if the drive to convert properties into purpose-built student accommodation (PBSA) continues apace. Therefore, the proposed SPD status of the Plan will go a long way towards preventing the same erosion taking place in The Park Estate Conservation Area.</p>	<p>Support noted.</p>
Individual	<p>The boundary should be coterminous with the Park Estate boundary. There are areas on the margins of the Estate that are excluded from the Conservation Area.</p>	<p>There is no imperative for the boundary of the Park Estate and the Conservation Area to be coterminous. One is an administrative boundary and the other is a designation for planning purposes. There may be good reason for the discrepancies such as the omission of buildings or sites that make no contribution to the</p>

	<p>It is essential to elevate this document to 'Supplementary Planning Document' status to give this historic area of national significance the strong protection it needs from inappropriate and damaging development.</p> <p>The significance of trees as referred to throughout the document and especially in DPG 8 and Priority 2, needs to be emphasised. The importance of maintaining the canopy of mature trees for aesthetic, historical and also environmental reasons must be strongly retained, as these are under special threat both on streets and in gardens and cannot be replaced within a lifetime when lost as mature specimens.</p>	<p>character of the area and would diminish its value if they were included.</p> <p>Support noted.</p> <p>Additional references have been added to trees in the introductory sections and the text to Core Elements I and II. Trees are now mentioned in all five of the Core Elements summary boxes. Added text to section on Works Requiring Permission to refer to need for formal notification for all works to trees over 75mm in stem diameter.</p>
<p>Nottingham Park Estate Conservation Trust</p>	<p>The Nottingham Park Conservation Trust is a registered Charity with the objective of preserving for the benefit of the towns people of Nottingham and of the nation at large, the architectural constructional and landscape heritage of the Nottingham Park Estate. The Trust has worked with interested parties in the Park Estate to support this Conservation Area plan and has made significant financial contribution to the cost of preparing this plan. The Trust strongly supports its prompt adoption. The Trust would like to encourage the City Council to adopt this CAAMP SPD as soon as is practically possible to do so.</p> <p>Whilst The Trust generally agrees with the existing Conservation Area boundary, it is asked that the City Council to consider if there is a benefit to extending the boundary along its southern edge to encompass the area between the south sides of Hope Drive and Fishpond Drive and the north side of Castle Boulevard from the border of Peveril Drive in the east to the footpath adjacent</p>	<p>Support noted.</p> <p>There is no real benefit in realigning the boundary of the Conservation Area for the properties that are already included within the Canal Conservation Area. These are granted the same protections whether they are within the Park or the Canal. It would be a purely academic exercise and not a good use of Council resources. However, there is some value in including nos. 58-64</p>

	<p>to 62-64 Castle Boulevard. This would necessitate a commensurate reduction in the Canal Conservation Area which covers part of this area. This would bring a small number of properties along Castle Boulevard into the Park Conservation Area that are not currently in a Conservation Area, which would include the caves at Park Rock (a scheduled ancient monument) and the Garde II listed houses at 62-64 Castel Boulevard. For the properties between Hope Drive / Fishpond Drive and Castle Boulevard (currently in the Canal Conservation Area), which are not dissimilar in character to other property in the Park Conservation Area it would mean that they benefited from this new and updated CAAMP.</p> <p>a) The conservation Area status of The Park will help preserve the character of the environment (buildings, landscape, use of land and gardens etc)</p> <p>b) The Trust believes that Conservation Area status is extremely important in protecting the character of the estate, which it is believed to be of national significance.</p> <p>c) The proposal to elevate the Conservation Area Appraisal and Management Plan to 'Supplementary Planning Document' (SPD) status is appropriate. The Trust has actively supported the objective of SPD status for the CAAMP and is grateful to the City Council for agreeing to this objective. It is believed that it is of considerable value in helping to protect and improve the character of the Conservation Area.</p>	<p>Castle Boulevard as these do contribute to the historic and architectural interest of the Park. The inclusion of the Park Rock apartment blocks is not favoured as it seems unnecessary to subject these modern buildings to additional controls and the Park Rock caves already enjoy a high level of protection due to their scheduled status.</p> <p>The City Council would need to go through a separate boundary review process. If there is merit in making the changes then affected owners and occupiers would need to be consulted as part of the boundary amendment process.</p> <p>No action.</p>
Individual	<p>Suggest that the City Council considers small extensions to the Conservation Area boundary as illustrated on the map supplied Area A: The area between the south sides of Hope Drive and Fishpond Drive and the north side of Castle Boulevard, to the western boundary of the current Canal Conservation Area. Reason: Although this is covered by the Canal Conservation Area, it's noted that</p>	<p>There is no real benefit in realigning the boundary of the Conservation Area for the properties that are already included within the Canal Conservation Area. These are granted the same protections whether they are within the Park or the Canal. It would be a purely academic exercise and not a good use of Council resources. However, there is some value in including nos. 58-64</p>

<p>the Canal Conservation Area Character Appraisal and Management Plan (paras 9.43 and 9.44 of that document) remarks on the area outlined and its relationship to the Park Estate and states “Hope Drive and the small section of Peveril Drive within the Conservation Area are more physically and functionally related to the Park estate and its Conservation Area than the Canal.” Therefore, suggest there may be value in making this alteration and moving the area outlined from the Canal Conservation Area to The Park Estate Conservation Area. Area B: This would bring a small number of properties along Castle Boulevard into the Park Conservation Area that are not currently in a Conservation Area, which would include importantly the caves at Park Rock (a scheduled ancient monument) and the Grade II listed houses at 62-64 Castle Boulevard and property adjacent that is also of similar character to many of the dwellings in the existing Conservation Area. The area would be from the western edge of the Canal Conservation Area to the footpath adjacent 64 Castle Boulevard, bounded on the north side by the current Park Estate Conservation area and the south side by Castle Boulevard. Furthermore: consideration could be given as to whether there is any benefit to be had from making the Conservation Area in this southwestern corner co-terminus with the Park Estate’s ‘administrative’ boundary.</p> <p>Prompt adoption of the Plan by the City Council is supported.</p> <p>Concerned at the potential negative impact on the visual amenity that could come about because of the use of visually inappropriate energy saving materials on property exteriors, especially where they may be installed under Permitted Development Rights. This would include such things as solar panels (including on rear and side</p>	<p>Castle Boulevard as these do contribute to the historic and architectural interest of the Park. The inclusion of the Park Rock apartment blocks is not favoured as it seems unnecessary to subject these modern buildings to additional controls and the Park Rock caves already enjoy a high level of protection due to their scheduled status.</p> <p>The City Council would need to go through a separate boundary review process. If there is merit in making the changes then affected owners and occupiers would need to be consulted as part of the boundary amendment process.</p> <p>Detailed guidance on individual alterations is not strictly within the remit of the SPD but can be addressed through the production of subsequent Design Guidance as suggested by Priority 7. The appropriateness of development will be considered in light of how it might impact on the five Core elements of the Park’s</p>
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	elevations because the topography of the Conservation Area means that views of buildings are not limited to property frontages alone), external wall cladding and things like externally mounted heat pumps etc. It may be that The Plan could benefit from further statements and clarity about this issue, and how harm can be reduced or prevented by such things.	character. Reference made to Historic England guidance on the topics of sympathetic retrofit and microgeneration.
Lilian Greenwood MP	The draft SPD will prove extremely valuable in ensuring that the character of this unique area is preserved and protected.	Support noted.
National Highways	The Park lies near Nottingham City Centre which is distant from the Strategic Road Network (SRN). Issues relating to The Park will have no adverse impact on the SRN and as such National Highways has no further comments to make.	No action.
Sport England	No issues to raise or comments to make on the SPD as drafted, however, there does not appear to be a section on the sports facilities within The Park, given that one roadway is called Tennis Drive. Whilst noting the reference to recreation grounds, page 35, should the history and value both in terms of use and as open spaces (views out and across etc) be referenced. Should there be a specific section which protects the sports facilities from loss or inappropriate development? Please note that the comments are made given that tennis courts and bowling greens which are not associated with a defined playing field area do not fall within the statutory planning consultation remit of Sport England.	Text added. The SPD does describe the value of the open space in terms of views and openness already and by including them as a key contributor to Core Element I: Landscape - Layout, Grain and Open Spaces the SPD recognises their sensitivity and value. Loss of the sports grounds has also been identified as bringing substantial harm to a heritage asset under DPG2 of the Management Plan providing a high degree of protection against inappropriate development under the NPPF. Loss or inappropriate development of the Sports Grounds is also controlled by restrictive covenants which fall outside the planning system but nevertheless introduce a hurdle that would be difficult to surmount.
HS2 Ltd	No comments to make on the draft SPD.	No action.
Severn Trent	No comments to make on the draft SPD.	No action.
Individual	The commitment in the management plan to the protection of trees is welcome but this should not be termed a review. The trees are an integral part of the context and character of the estate and should be specifically mentioned more often, for example in the	Additional references to trees have been added to the introductory sections and the text to Core Elements I and II. Trees are now mentioned in all five of the Core elements summary boxes. The Views section highlights the value of the tree canopy in creating intimate views

	<p>introduction (overview) and its sub sections. The identified 5 core elements should include reference to trees, in particular large trees that are in scale with the historic buildings. In summary there should be more about trees throughout the document and certainly early on. Notifications of tree work and applications to carry out work to protected trees comprise the bulk of "development" in the Park and so the Conservation Area Appraisal must acknowledge this, and provide a helpful context to Development Management and estate management for the processing of tree work. Views of buildings through trees are important but rarely sufficient reason alone to justify felling and lopping. This is probably worth stating in the Appraisal. On the detail, advise omitting the hyphen in references to "evidence base", and not familiar with the words "polaric" (Page 66) and "demarking" (P70).</p>	<p>and glimpses of the buildings and certainly does not encourage or justify felling. Text also added to section on Works Requiring Permission to refer to need for formal notification for all works to trees over 75mm in stem diameter. Omitted hyphen in 'evidence base'. Replaced 'polaric' and 'demarking' with simplified language.</p>
Individual	<p>The Coach House on Fiennes Crescent, The Park, NG7 1ER) has been wrongly categorised in this document as an 'original estate house' when in fact it was built in 1990/91. On the map on page 23 it is shown in black and using the legend it should be red, as a post 1918 development. A small building was demolished in 1990 and replaced by a much larger new building. This new building is shown in the photo on page 60 of the SPD and described as a converted coach house but in fact, absolutely nothing remains of the original building (other than the shape of the doorway) and the footprint is approximately twice the size. It should therefore be categorised as new build. (Photos provided).</p>	<p>Error corrected.</p>
Environment Agency	<p>Flood risk: The Park area of Nottingham is located fully within flood zone 1 and therefore there are no fluvial flood risk concerns related to this area. There are some areas indicated to be a risk of surface water flooding. However, any enquiries relating to surface water flood risk should be directed to the Lead Local Flood Authority (LLFA) as</p>	<p>Support noted. Water efficiency target covered in Local Plan.</p>

	<p>this fall within their remit. Source Protection Zone (SPZ): The Park area of Nottingham is located within a Source Protection Zone. While the SPD does not indicate the likelihood of any substantial development were any proposals to come forward in the future the implications of development on groundwater resources will need to be considered. It may be advisable to include mention of this within the SPD. Water Efficiency: Pleased to note the 'Sustainable Change' section of the SPD which highlights a requirement for all new residential development and the maintenance to existing buildings to take sustainability into account. This section pays attention to the requirements to meet Carbon Net Zero targets. Recommend that the document also includes mention of the requirement to meet the tighter water efficiency targets of 110 litres per person per day unless it can be demonstrated that this is not feasible. It is recommended that this is applied to both new build and current structures which are being refurbished/improved. Producing mains water, treating wastewater and in-home water heating has significant embedded energy and requires chemical inputs, therefore reducing water demand per capita by requiring the tighter standard of 110 l/p/d could lead to significant reductions in the associated carbon emissions.</p>	
Local Access Forum	<p>The Nottingham Local Access Forum (LAF) is a statutory advisor made up of volunteers who advise the Council and other relevant bodies (Section 94 bodies under the Countryside and Rights of Way Act 2000) on the improvement of public rights of way and access to and through Nottingham. The Local Access Forum welcomes the issue of this draft but wants to see a recognition in it that the Park Estate is an asset for all the people of Nottingham and not just the inhabitants and their Management Company. The Park is not as described (p9 section XI) a gated enclave, but a heritage asset, and it</p>	<p>Amendments made to change the language around exclusivity and accessibility to pedestrians and cyclists.</p>

should be available for all to view. Its streets although privately maintained are otherwise identical to the adopted highway and must continue to provide numerous routes for commuters and others on foot or cycling into the city centre. The draft correctly describes (P34) the Circuses and other pocket parks as "public open space". It is reasonable for conservation reasons that the local planning authority (LPA) and the Park Estate management should regulate the flow of motor vehicles through the estate, but the document must commit to maintaining or enhancing permeability (p31) for pedestrians and cyclists. In this context the various points of pedestrian entry should not be described as "minor" (p50) and deserve more consideration than is given in the draft. In regard to other detail the Forum makes the following observations: Strong agreement with DPG 2 (iv) [p85] that loss or development of the Park's formal and informal communal and recreational open spaces, including the bowl, circuses and parks and other open spaces, would produce substantial harm to the area: strongly support DPG10 (v) [p 89] that works that facilitate the use of sustainable uses of transport other than cars, minimising on street parking, can have a positive impact; support D [p89] that upholding and enhancing The Park as a sustainable semi-natural suburban environment is critical, the example given in III. [Development that promotes and secures sustainable living arrangements (e.g. no parking requirement)] could be detrimental to the provision of cycle parking, contradicting DPG10 v above. Similar comment relating to DPG6 [p86]. Agree that its green infrastructure makes important contributions to the area and that certain development adversely impacts upon the streetscape, the Forum does not want section VII.[ Addition of outbuildings, bins and other paraphernalia to road scenes (including within plots)] be used to prevent sympathetically designed cycle parking

	being developed. In summary the LAF supports the CAAMP but regards it as incomplete without a clear commitment to public access. (For information the Local Access Forum has 2 self-guided walks that pass through the Park which highlight the significance of some of these entry points/ routes (including walk no 3 Lenton and Park which mentions Lenton Road part of the 'the ancient food road ' between Beeston and Nottingham and no 12 Park Steps and Tunnel walk)).	
Historic England	Historic England do not provide detailed advice on every appraisal and management plan due to resource implications, but if there are specific issues that would merit our closer involvement on this occasion please advise us of this. For general advice, our publication Conservation Area Designation, Appraisal and Management is available online from our website.	Reference included within Appendix 1.
Nottingham Building Preservation Trust	This historic area of The Park is of both local and national importance. The Draft SPD is both informative and well researched. The document is impressive in depth and detail. The work of Alan Mulcahy of 2007 is properly acknowledged. The initiative is necessary, and the aims are applauded, particularly given the pressure on both conservation areas and the planning system in recent years. It is noted that the biggest current threat is that of the loss of garden space to new "development", no doubt driven by a desire for financial gain. The NBPT fully support both the development principles outlined on pages 82 and 83 and the list of Priorities on pages 91 and 92. There is reference to the role of Pre-App advice, but the costs and potential delays associated with this system are often not helpful. With regard to materials identified as appropriate, it is suggested that a pallet of acceptable materials e.g. facing brick, roof tile, etc. could be compiled to assist with development proposals and avoid those repetitive enquiries which always include an element of costly delay. It is important that developers are	Noted, about pre-app advice. Lack of resources aside, pre-app is often essential to the delivery of a good quality development and providing an informed approach. It is hoped that any resourcing issues within the planning department are a short-term issue. Sourcing a palette of materials seems inappropriate given the difficulties in material supply chains. Each case should be treated on its merits and not constrained by a limited choice of rigidly defined materials. Design Guidance is referred to as desirable under Priority 7 and this could prove a very useful way of engaging the community in the development of suitable guidelines.

	<p>encouraged to take not just advice, but the right professional advice needed to engage with the planning system. The NBPT appreciates that cuts in local authority funding and the lack of personnel have an impact on the current situation and encourage the suggestion that a resident-led body should support the local planning authority in the management of The Park.</p>	
Park News	<p>A significant blight on the streetscapes in The Park is the presence of wheely bins. Ensure that all new buildings have somewhere to store wheely bins so that they are out of sight when not out for collection? Also, if there was any way to strengthen the rules about taking bins off the street after they have been emptied this would be most welcome, as the current rule is widely ignored, particularly in the roads with large numbers of student HMOs.</p>	<p>New development is subject to design policies which includes adequate bin storage. Ongoing issues of bins being left on streets is an operational issue and cannot be addressed in this document.</p>
<p>Councillor Angharad and Councillor Webster (joint response), Nottingham City Council</p>	<p>Strongly support all efforts to ensure the strongest possible planning protections for The Park Estate. In the summer of 2019, there was an initial workshop in the early stages of the development of the refreshed Conservation Area Appraisal and Management Plan. Despite the pandemic and the many challenges which have faced organisations and individuals over the past three years, this significant piece of work has been completed and provides a thorough and detailed description of The Park and the history of its development. It also offers substantial evidence of what makes it so special – indeed, in some ways, unique – in terms of its architecture, layout, harmony with landscape and distinctive street features. Most importantly, it offers a range of practical tools for planners, developers, and landowners to improve future planning applications and to guide decisions on these. The ‘Park Development Policy Guidance’ section sets out useful principles for development and for evaluating planning applications. It also offers clear definitions of “substantial harm”, “less than substantial harm”, “positive impact” and “sustainable</p>	<p>Support noted. No action.</p>

	change”, providing guides to types of development to be deprecated, as well as development to be welcomed in this extraordinary area. The priority planning tools also outline the various routes by which aspects of The Park Estate can be better protected in future. Strongly support the adoption of the draft as a Supplementary Planning Document.	
<b>Additional written comments were also gathered at the public meeting held on 7 November 2022</b>		
	Need to ensure not “handcuffed”, particularly as technology and building efficiency advances, e.g. use of UPVC windows may be much more energy efficient.	Text added.
	Would be useful to have examples of building/alteration etc which would be acceptable and not negatively impact on conservation goals.	Text, photographs, and captions added to Core Element III section.
	Would be beneficial to consider future energy conservation initiatives such as electric charging points, solar panels, ground, and air source heat pumps?	Difficult to suggest specifics, but reference made to HE guidance on the issue.
	Need greater clarity about how installation of solar panels would be approved/viewed.  PV panels and ASHP visibility a potential problem.	Text added.
<b>Questions from the public meeting held on 7 November 2022</b>		
	A question was asked regarding permitted development rights in conservation areas and the use of Article 4 Direction.	Article 4 directions are effective in restricting permitted development rights and there would be merit in introducing an Article 4 direction in the Park Conservation Area. An Article 4 covering all the Original Estate Houses would be particularly easy to justify and could provide additional control over works such as the replacement of windows and doors, alterations to boundary treatments, installation of rooflights and installation of microgeneration equipment. Such a measure would provide an exemplar. However, Article 4 directions are time consuming and complex to set up and require additional staff time resources to administer. They inevitably result in an increased number of planning applications and place additional burden on

		enforcement capacity due to the greater potential for infractions. Ultimately NCC need to balance the risks to the historic environment against the resources available. Given the Park is an affluent area which is generally well maintained, the need for additional planning controls is relatively low compared to some of Nottingham's other conservation areas which may be higher priority.
	Question about post 1918 and how to improve on a carbuncle.	Text, photographs and captions added to Core Element III section of document.
	Question regarding light spill and the Park's gaslighting, and how lighting for driveways was often needed because the park was so dark.	The Planning Portal states that minor domestic light fittings are not controlled by the planning system. However, lighting levels should be of an appropriate intensity and lights directed so that they do not disturb others. Listed Building Consent is required for lights attached to a listed building.
	Question about parking, and how could it be harmful to build a driveway on a garden when that could reduce parking on the street.	Planning permission is not required for hardstanding or driveways which are surfaced in permeable materials that allow free drainage. Hard standing positioned between the front wall of a house and the front boundary need planning if they are larger than 5sq metres and constructed from impermeable materials. The Park CAAMP is not meant to be a 'design guide' as such and doesn't set out principles of what might be appropriate. Instead it identifies increased parking hardstanding as potentially harmful to the character of the area and advises against development which might worsen this trend. Publication of 'Design Guidance' for the Park is listed in Chapter 3 of the Management Plan under Priority 7 as one of the desirable planning tools that could be brought forward.
	Question about electric cars and electric charging points.	Electric car charging points are not controlled by the need for planning permission on residential plots. They tend to be small in scale and if positioned within the grounds of a property they will have no significant impact. On street EV charging points will be a matter for

		the Park Estate to tackle when they choose to do so. There are ways to integrate these sensitively into a street scene through the use of discreetly designed fixtures. Publication of 'Design Guidance' for the Park is listed in Chapter 3 of the Management Plan under Priority 7 as one of the desirable planning tools that could be brought forward.
	Question about UPVC windows and if the SPD will help.	Text added referencing HE guidance.
	Debate about value of air, source, heat, pumps and ground source heat pumps.	Text added referencing HE guidance.
	Question about potential contribution of locally listed buildings.	Text added.