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7<sup>th</sup> September 2020

Dear Sir/Madam

### **Greater Nottingham Strategic Plan, Growth Options Consultation July 2020 Consultation Response**

Urban Vision Enterprise CIC has been appointed by Linby Parish Council to submit representations with regard to the aforementioned document.

The responses to the questions set in the Greater Nottingham Strategic Plan, Growth Options Consultation are enclosed in the attached table. Further to the responses to the set questions, Linby Parish Council also wish to make clear with particular reference to the parish the impact of the strategic plan growth options. The following key points are raised in addition to the table included:

#### **Design and Placemaking**

The made neighbourhood plan for Linby parish includes policies that encourage site specific design that is locally distinctive. Policies in the strategic plan should encourage a site-specific response, including promoting innovative design that takes account of the local character and distinctiveness, avoiding overly prescriptive generic design codes that undermine neighbourhood plan policies. It would be useful if the strategic plan could make clear that it does not supersede or replace neighbourhood plan policies.

## **Infrastructure Requirements**

The AECOM Greater Nottingham Growth Options Study, July 2020 identifies deficiencies in infrastructure. The neighbourhood plan also identified opportunities where community and transport infrastructure provision could be improved through policies COM1: Community Facilities and DC1: Developer Contributions.

The neighbourhood plan also encourages through future development the improvement of the highway network through policies TRA1: Traffic and Transport and by identifying critical road junctions, the plan also provides positive design solutions should strategic allocations be realised through the concepts road management strategy. We would like to emphasise infrastructure requirements include community infrastructure in addition to transport.

## **Site Allocations**

The consultation document includes 2 potential sites for allocation in the parish in addition to the existing strategic allocation at Top Wighay. The additional sites identified in the evidence base document include safeguarded land and green belt land. AECOM identifies these in the Red Amber Green (RAG) system as amber 'potentially suitable'. The Parish Council has evidenced that current infrastructure is insufficient to support the existing strategic site allocation. Clearly therefore it is equally insufficient for any additional site allocations.

Linby Parish has already taken a significant level of additional growth though other sites in the past 5 years. It is clear that this has overwhelmed local infrastructure. The approach to allocating sites should be proportionate to the entire strategic plan area, taking into account need, demand, infrastructure and the sustainability of sites. Given there are numerous sites identified as 'green' in the report, amber sites should be treated with caution. This is particularly the case where the evidence base suggests there is only capacity for small scale development and larger sites would be unsustainable, resulting in the further loss of green belt.

It is noted that the housing figure for Greater Nottingham is 59,420 between 2018 and 2038. The Greater Nottingham Growth Options Study, July 2020 identifies a number of 'green' rated RAG sites in the broad area search summary. Taking these total areas there are 2,780 Ha across the entire area. Based upon 35dph this indicates a potential of land availability for 97,300 new homes. Obviously, some of this land would be necessary to deliver the associated infrastructure for this level of growth, however, there appears to be sufficient land identified to support the level of growth intended.

## Historic and Natural Environment

Linby Neighbourhood Plan includes Local Green Space designations. The strategic plan provides an opportunity to identify where links to the strategic green network and opportunities to create new links can be created as part of the GBI commitment.

Linby parish includes a range of natural and built environment assets. These include a conservation area, Linby quarries, ancient woodland and many statutory listed buildings. The strategic plan should highlight the importance of historic assets and recognise their contribution to the economic value of the area.

## Greater Nottingham Strategic Plan, Growth Options Evidence Base

Linby parish forms part of the area identified as Gedling North in the AECOM Greater Nottingham Growth Options Study, July 2020. When considering the growth options identified in the Strategic Plan Growth Options, we reiterate the summary points that AECOM raised:

- *“The Major Road Network (MRN) is constrained by traffic congestion and further detailed analysis would be required using a multi modal transport model.*
- *Areas of high fluvial flood risk (Flood Zone 3) exist in Hucknall and Arnold associated with the River Leen, Day Brook and Baker Lane Brook, and in the east of Gedling North, associated with the headwaters of the Dover Beck.*
- *The area surrounding Hucknall has an underlying geology that makes it susceptible to groundwater flooding.*
- *There are a few pockets of ancient woodlands in the area, specifically at Aldercar Wood and Quarry Banks (north of Hucknall), and Gunthorpe Hagg Wood (West of Ravenshead).*
- *There is one SSSI at Linby Quarries (north of Hucknall).*
- *Factors which contribute to the landscape value include: the historic parkland at Newstead Abbey and the ancient woodland to the north of Hucknall.*
- *Factors which increase the landscape susceptibility include: the complex landform (particularly in the east), the presence of extensive urbanisation and settlement coalescence in the south-west and the presence of characteristic woodland and heathland which is associated with Sherwood Forest.*
- *There is currently a deficit in secondary school capacity in Gedling.”*

We fully agree that traffic infrastructure, community infrastructure, flood risk and natural environment are key issues to fully consider.

The combination of these findings reinforces the concerns that the Parish Council have about the potential of further growth at Top Wighay, beyond the current allocated strategic site.

## Conclusions

To conclude, Linby Parish Council supports a proportionate, evidenced approach to development within and around the neighbourhood area that is sustainable. The parish council recognises the opportunity of the strategic plan to consider the future growth strategy of Gedling Borough in the wider context, and its ability to plan positively for future generations.

Yours faithfully

A handwritten signature in black ink, appearing to read 'HAB', enclosed within a simple, hand-drawn oval shape.

Hannah Barter  
Director

ENC Table of responses to questions.

## Consultation Question Responses from Linby Parish Council

| Chapter 1 |  |
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| INT1      | <p>We would suggest the following:</p> <ul style="list-style-type: none"> <li>• Protection of the natural environment;</li> <li>• Protection of the historic environment;</li> <li>• Ensuring that the area is supported by sufficient infrastructure (transport and community infrastructure); and</li> <li>• Enabling more sustainable live work patterns.</li> <li>• Good connectivity for connectivity broadband</li> </ul>  |
| INT2      | <p>There is very generic information on heritage (even for a strategic document) and there needs a greater focus on the distinctiveness of boroughs.</p> <p>The economic and employment related evidence proceeds the March 2020 Covid-19 lockdown. This needs to be revised taking account of short, medium and long-term impacts of the Covid-19 lockdown. This is particularly the case with retail, hospitality, distribution and commercial and industrial developments.</p> <p>Evidence on community infrastructure needs to understand current capacity and where there are deficiencies. This will then provide accurate information on where new infrastructure is required. This is particularly relevant to the transport scheme as the previous document was produced in 2012.</p> |
| INT3      | <p>We would emphasise that issues such as built heritage are not just about protection but also other dimensions such as heritage-led regeneration.</p>  |
| Chapter 2 |  |
| OS1       | <p>We do support the focus of development in city and town centres as part of sustainable regeneration. Our reasons for this include:</p> <ul style="list-style-type: none"> <li>• Existing areas make it easier to link well to transport infrastructure;</li> <li>• Avoids more fragmented impacts on the natural and rural environments;</li> <li>• Prevents urban sprawl by prioritising brown-field sites and making and effective use of land; and</li> <li>• Having homes in or close to the central business district provides opportunities for a walkable neighbourhood and could help to counter changes in the demand for office space.</li> </ul>   |

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| OS2 | Dispersed development would have a greater impact on the rural areas and create greater competition with existing areas. This would also create more car journeys and is an unsustainable option.  |
| OS3 | Clearly development needs to enhance existing infrastructure, however, it is also important for new development to be supported by green infrastructure as part of any development.  |
| OS4 | Obviously existing transport infrastructure is one of the factors in determining where future growth takes place. Development that facilitates the extension of transport links such as the tram network would also contribute to the sustainable growth of settlements.   |
| OS5 | <p>The strategic aims should set the priorities to achieve this. On a practical level the strategic plan should:</p> <ul style="list-style-type: none"> <li>• Plan for more sustainable live-work patterns (broadband, flexible home office space, transport at right times, reduce car journey's, encourage walking cycling);</li> <li>• Enabling sustainable travel to reduce car journeys;</li> <li>• Regenerating existing centres rather than creating dispersed settlements; and</li> <li>• Re-populating town and city centres to keep people in close proximity to employment facilities.</li> </ul>   |
| OS6 | <p>In addition to the standard methodology they need to take account of significant infrastructure such as the HS2 development. At the same time, they need to consider what the implications of Covid-19 and the aftermath would be, in particular in relation to high levels of unemployment. We would expect to see less demand for privately owned housing and more for rented accommodation.</p> <p>This also provides an opportunity to consider re-purposing vacant employment sites, particularly where there is an oversupply of office accommodation. This in line with the NPPF would make a more efficient use of land.</p>  |
| OS7 | <p>Growth options should be evidenced not just based on need or demand but prioritising the re-use of existing land that has been previously developed or where development would facilitate the growth of sustainable transport infrastructure to help reduce car journeys and help to achieve carbon neutrality and reinforce existing centres.</p> <p>The development of green-belt land or safeguarded land should not be prioritised for new development in this plan. The AECOM Greater Nottingham Growth Options Study, July 2020 sets out a RAG rating for potential new development sites. It identifies potential for <i>“over 7,000 hectares of strategic development, well</i></p> |

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|      | <p><i>above the requirements for development land for the coming plan period to meet housing and employment need.”</i></p> <p>Growth options should be proportionally based upon the evidenced need or demand. The summary for Gedling North in the AECOM report clearly states this is not the case in this area. A balanced approach should be taken to the distribution of growth, informed by the evidence base produced by AECOM. This will ensure that the growth strategy is reflective of the need of the entire area and appropriately located.</p>   |
| OS8  | <p>Growth options should prioritise the re-use of existing land that has been previously developed or where development would facilitate the growth of sustainable transport infrastructure to help reduce car journeys and help to achieve carbon neutrality and reinforce existing centres.</p>  |
| OS9  | <p>It is noted that the housing figure for Greater Nottingham is 59,420 between 2018 and 2038. The Greater Nottingham Growth Options Study, July 2020 identifies a number of ‘green’ rated RAG sites in the broad area search summary.</p> <p>Taking these total areas there are 2,780 Ha across the entire area. Based upon 35dph this indicates a potential of land availability for 97,300 new homes. Obviously, some of this land would be necessary to deliver the associated infrastructure for this level of growth, however, there appears to be sufficient land identified to support the level of growth intended.</p>   |
| OS10 | <p>The development of green-belt land or safeguarded land should not be prioritised for new development in this plan. According to the AECOM evidence base document there is land identified <i>“well above the requirements for development land for the coming plan period to meet housing and employment need.”</i></p> <p>Linby Parish Council notes that this creates an evidence-based opportunity through the strategic plan to update the green belt boundary to place the Top Wighay Safeguarded land once again back into the green belt. When considering the AECOM evidence for Gedling North it makes the case that the lack of infrastructure, limited demand for new homes and that the existing road infrastructure is already at capacity with no additional capacity accommodated in a recent planning application this would create an unsustainable extension to an existing strategic site that has still not be developed.</p> <p>This would be contrary to national planning policy of making effective use of land and prioritising previously developed land.</p> |

| Chapter 3   |   |
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| <b>GBI1</b> | Other areas that could be identified as GBI assets, potentially are the Local Green Space Designations in neighbourhood plans. Nottinghamshire Wildlife Trust may also have more up to date ecological and habitat mapping that could be used to inform any additional assets.  |
| <b>GBI2</b> | <p>Proposed development can enhance and protect GBI by:</p> <ul style="list-style-type: none"> <li>• Avoiding areas of high sensitivity;</li> <li>• Focusing development on existing centres to minimise impact in the wider rural area;</li> <li>• Policies on protection of landscape features;</li> <li>• Very robust design policies; and</li> <li>• Ensuring that landscape and public realm are an integral part of the design of strategic sites.</li> </ul> <p>Also see policies NE1 Habitats, Trees and Hedgerows and NE2 Landscape and Rural Character in the Linby Neighbourhood Plan, which further support these strategic aims.</p> |
| <b>GBI3</b> | <p>Net gains in biodiversity can be achieved by:</p> <ul style="list-style-type: none"> <li>• Focusing development on existing centres to minimise impact in the wider rural area;</li> <li>• Policies on protection of landscape features;</li> <li>• Very robust design policies; and</li> <li>• Ensuring that landscape and public realm are an integral part of the design of strategic sites.</li> </ul> <p>Also see policies NE1 Habitats, Trees and Hedgerows and NE2 Landscape and Rural Character in the Linby Neighbourhood Plan.</p>   |
| Chapter 4   |   |
| <b>GB1</b>  | Yes, the principle of the green belt should be maintained, although accepting there may be some adjustment based on evidence.   |
| <b>GB2</b>  | <p>The approach to any amendment to the green belt should be clearly evidenced.</p> <p>Linby Parish Council notes that this creates an evidence-based opportunity through the strategic plan to update the green belt boundary to place the Top Wighay Safeguarded land once again back into the green belt. When considering the AECOM evidence for Gedling North it makes the case that the lack of infrastructure, limited demand for new homes and that the existing road infrastructure is already at capacity with no additional capacity accommodated in a recent planning application this would create</p>                               |



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|                  | an unsustainable extension to an existing strategic site that has still not be developed.   |
| <b>GB3</b>       | <p>When considering how to offset losses to the green belt, we suggest:</p> <ul style="list-style-type: none"> <li>• Considering the needs of non-car users;</li> <li>• Promoting reduced car journeys and catering sufficiently for this;</li> <li>• Considering a range of mobilities; and</li> <li>• Ensuring all development has access by walking and cycling to high quality public realm and green spaces.</li> </ul> <p>Policy DES1: Design in the Linby Neighbourhood Plan supports this strategic policy area.</p>  |
| <b>Chapter 5</b> |   |
| <b>EMP1</b>      | <p>The methodology set out in paragraph 5.6 covers a broad range of areas. In addition, it should, take account of the impact of the short, medium and long-term impacts of the Covid-19 lockdown. This is particularly the case with retail, hospitality and distribution and commercial and industrial developments.</p> <p>Linby Parish Council note that currently within the parish and wider Gedling Borough that there is an oversupply of employment land with many units vacant and underutilised.</p> <p>A greater emphasis and up to date study is required to understand the true level of vacant, underutilised or available employment sites before considering any new allocations. This study may provide the opportunity to consider alternative land-uses for these sites across the area, where the oversupply has been created, helping to address the issues associated with this change in level of demand.</p> |
| <b>EMP2</b>      | The approach to delivering new office development should be focused in population centres, including Nottingham City Centre and potentially the HS2 area but not in urban extensions as this is not sustainable.  |
| <b>EMP3</b>      | <p>Generally, we recognise the importance of supporting innovation. It is important to recognise the role of small or micro-businesses in supporting innovation including home-based businesses.</p> <p>This also provides an opportunity to ensure that infrastructure necessary for homeworking is incorporated into new development. This includes 5G and super-fast fibre connections.</p>  |
| <b>EMP4</b>      | Key regeneration priorities should include:   |

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|                  | <ul style="list-style-type: none"> <li>• Town and City Centres (for example, Broadmarsh);</li> <li>• Underperforming areas.</li> </ul>   |
| <b>EMP5</b>      | <p>Businesses can be encouraged to address climate change by:</p> <ul style="list-style-type: none"> <li>• Promoting working from home and innovative working patterns;</li> <li>• Ensure where employment land for commercial uses including offices is located, it is near to population centres;</li> <li>• Support small and micro-based businesses; and</li> <li>• Promote sustainable travel to work methods.</li> </ul>   |
| <b>EMP6</b>      | <p>We should continue to safeguard good quality sites. However, there needs to be a balanced approach to housing and employment. This should be based on evidence of need to avoid areas of over supply or lack of sites that support a range of business and employment opportunities.</p>  |
| <b>EMP7</b>      | <p>Rural diversification can be further supported by the delivery of communications infrastructure, including 5G and super-fast fibre broadband. Policy EMP1 High Speed Connectivity in the Linby Neighbourhood Plan supports this.</p>  |
| <b>Chapter 6</b> |  |
| <b>H1</b>        | <p>Approaches to affordable housing could include:</p> <ul style="list-style-type: none"> <li>• Ensuring delivery is integrated within development and these should be tenure blind;</li> <li>• Viability is a key factor and clearly in some areas there could be an emphasis on affordable housing;</li> <li>• Ensuring that the delivery of affordable housing creates the right types of new homes to meet the needs of the community, such as homes for downsizing or starter homes; and</li> <li>• Ensure that new homes have good links to public transport, encourage reduced vehicle journeys and promote walking and cycling, through the provision of new and improved infrastructure.</li> </ul> |
| <b>H2</b>        | <p>When recognising the role in influencing housing mix, size, type and tenure:</p> <ul style="list-style-type: none"> <li>• Recognising and maintaining the neighbourhood plan policies (Such as policy HSG1: Housing Mix in the Linby Neighbourhood Plan), making sure they are not superseded by the strategic plan; and</li> <li>• Recognising the tendency of the market to deliver larger than needed housing.</li> </ul>  |
| <b>H3</b>        | <p>Meeting the needs of different groups is supported through the policies in the Linby Neighbourhood Plan:</p>  |

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|                  | <ul style="list-style-type: none"> <li>• Recognising and maintaining the neighbourhood plan policies (Such as policy HSG1: Housing Mix in the Linby Neighbourhood Plan), making sure they are not superseded by the strategic plan; and</li> <li>• Recognising the tendency of the market to deliver larger than needed housing.</li> </ul>   |
| H4               | The strategic plan should make sure that there is adequate provision within the area for accommodating the housing and travel needs of Gypsies, Travellers and Travelling showpeople. This is not a particular issue affecting Linby.   |
| <b>Chapter 7</b> |   |
| CTC1             | <p>The hierarchy of centres acknowledges Hucknall which adjoins Linby Parish. Indeed, this is a major district centre for our community.</p> <p>Linby Parish Council supports a joined-up approach with neighbouring authorities when considering how to create sustainable communities and places.</p>   |
| CTC2             | <p>We can support city, town and district centres by:</p> <ul style="list-style-type: none"> <li>• Ensuring ground floor units remain in accessible town centre uses;</li> <li>• Re-use of centre uses;</li> <li>• Ensuring there are a good choice of modes of transport into the city and town centres; and</li> <li>• Recognising the importance of cultural uses and events in making town and city centre uses viable.</li> </ul>  |
| CTC3             | They need to be as protective as possible of the existing centres particularly now post Covid-19.   |
| <b>Chapter 8</b> |   |
| D1               | <p>At a strategic level the plan needs to recognise the importance of design not just creating distinctive places, but in delivering effective and sustainable development and creating places that attract people to live.</p> <p>Emphasize that good design is about a participatory process and not about a crude design code.</p> <p>Ensuring that the design quality set in the policies of neighbourhood plans is upheld, recognising local distinctiveness. For example, policies DES1: Design and CBH2: Historic Character in the Linby Neighbourhood Plan.</p> |
| D2               | It is important to emphasize that conserving and enhancing the historic environment is not just about protection but the importance of the role of the historic environment in delivering economic and heritage led regeneration.   |

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|                  | <p>This includes the role of peripheral commercial and industrial areas in supporting innovation and change.</p> <p>The plan also needs to recognise that heritage is part of the infrastructure of our modern communities and economies. It is places where people live, work and spend leisure time.</p> <p>Recognise the importance of third sector organisations in delivering heritage led regeneration.</p>   |
| <b>Chapter 9</b> |   |
| <b>IN1</b>       | <p>The provision of infrastructure needs to plan for the longer-term and ensure that issues raised in the evidence base are adequately addressed. For example, the AECOM report clearly states that the road infrastructure around Linby and Top Wighay is at capacity and requires further modelling to better understand the extent of the impact of growth within the area.</p> <p>Other barriers include the lack of community infrastructure provision, especially when these requirements are reduced in subsequent planning applications for example healthcare and education provision.</p> <p>The lack of delivery of communications infrastructure, including 5G and super-fast fibre broadband is also an issue. Policy EMP1 High Speed Connectivity in the Linby Neighbourhood Plan supports the delivery of new communications infrastructure.</p> <p>The capacity of public transport. This includes the type and suitability of frequency, particularly in reference to the bus network.</p> |
| <b>IN2</b>       | <p>Priorities for development funded infrastructure include:</p> <ul style="list-style-type: none"> <li>• Creation of green areas and better pedestrian and cycle links;</li> <li>• Ensuring that community infrastructure is provided; and</li> <li>• Most critically for Linby Parish, the provision of improvements to the highway network to better cope with the current and future demands as currently the network is approaching capacity without considering the impact of future impacts created by potential strategic allocation developments.</li> </ul>   |
| <b>IN3</b>       | <p>The timely provision of infrastructure can be delivered by:</p> <ul style="list-style-type: none"> <li>• Reflecting this in site allocations;</li> <li>• Policies on site allocations in the strategic, local and neighbourhood plans; and</li> <li>• Ensure that infrastructure is provided in Section 106 agreements before the development is occupied.</li> </ul>  |

| Chapter 10 |   |
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| <b>O11</b> | The additional points are raised in the body of the letter. These are primarily about ensuring that future growth is sustainably located and where new development is sited that appropriate levels of infrastructure are included. |