



uvecic.co.uk  
01538 386221  
info@uvecic.co.uk

Urban Vision Enterprise CIC  
Foxlowe Arts Centre (1<sup>st</sup> Floor)  
Stockwell Street  
Leek, Staffordshire  
ST13 6AD

F.A.O: Forward Plans,  
Place and Communities,  
Ashfield District Council,  
Urban Road,  
Kirkby-in-Ashfield,  
Nottingham,  
NG17 8DA.

3<sup>rd</sup> November 2021

Dear Forward Plans Team,

**Planning and Compulsory Purchase Act 2004  
Town and Country Planning (Local Planning) Regulations 2012  
Draft Ashfield Local Plan Consultation – Regulation 18  
Response of Linby Parish Council**

Urban Vision Enterprise CIC has been appointed by Linby Parish Council to respond to the proposed Draft Ashfield Local Plan, Regulation-18 consultation.

In general, the Local Plan is welcomed. It sets out a clear planning framework for the entire district. Most of the policies relevant to Linby are supported. However, there are concerns over some of the proposed site allocations, especially considering their cumulative impact when considered together with current and proposed development in Gedling Borough.

## Chapter 1

### **Plan Purpose and Background:**

Paragraph 1.3 references the list of documents used to inform the plan. However, in the list and the footnote 6 the NPPF 2019 is referenced. From this point onwards the document has been updated to make reference to the NPPF 2021.

## Chapter 3

### **Strategic Policy S1: Achieving Sustainable Development**

Sustainable growth for Ashfield is supported, but there are real concerns over the capacity of transport infrastructure (including roads and public transport provision) and community infrastructure (including health and education). This is especially critical when the impacts of development in Gedling Borough are taken into account.

Clause 2 supports new development in the district and identifies a framework of criteria. The proposed site allocation at Land at Whyburn Farm, Hucknall would conflict with the following items in clause 2:

- B in terms of adversely affecting the character and amenity of the area;
- C in respect of highway safety and capacity; and
- G it forms part of a larger site where there is an infrastructure requirement.

This proposed strategic allocation is adjacent to Top Wighay Farm, another strategic allocation in the adjoining local authority. We can see little or no evidence that the collective impact has been considered. It is clearly essential that impacts be considered across administrative boundaries.

### **Strategic Policy S3: Location of Development**

This policy sets the growth strategy for the plan, based on a 5-tier hierarchy of settlements.

The proposed site allocation for Land at Whyburn Farm, Hucknall is identified in the second tier 'New Settlements'. Whilst the second proposed site allocation at Linby Kennels, Church Lane would be tier 5 'Remainder of the District'. It also recognises that tier 2 sites deliver large-scale, long-term growth for the district, extending beyond the life of the Local Plan. Land at Whyburn Farm, Hucknall is one of 2 new proposed new settlements.

Furthermore, land at Whyburn Farm is adjacent to Top Wighay Farm, a strategic allocation in Gedling Borough. The impact of such significant growth requires a more comprehensive and open discussion with adjoining authorities and stakeholders, such as Linby Parish Council.

The two proposed site allocations (land at Whyburn Farm, Hucknall and Linby Kennels, Church Lane) necessitate the removal of green belt in order to create the allocation. This is of serious concern to Linby Parish Council.

There are 5 purposes of green belt. These include 'to check the unrestricted sprawl of large built-up areas' and 'to prevent neighbouring towns merging into one another'. The proposed site allocation to deliver 43 homes on the edge of Linby settlement would amount to urban sprawl. In effect it creates coalescence between Hucknall identified as tier 1 'main urban area' and Linby tier 5 'remainder of the district', this would merge the two settlements which are at opposite ends of the growth hierarchy.

With reference to the site allocation for land at Whyburn Farm, both 'to check the unrestricted sprawl of large built-up areas' and 'to assist in safeguarding the countryside from encroachment'

would be applicable. Hucknall a tier 1 settlement is proposed to include an urban extension through this allocation which will directly encroach into the open countryside.

#### **Strategic Policy S4: Green Belt**

Policy S4 reinforces national policy on green belt, identifying where green belt is within the district. This is of particular importance to Linby Parish Council to ensure that the green belt at the edge of Linby Village is not eroded over time through applications that are contrary to national policy.

#### **Strategic Policy S5: High Quality Buildings and Places through Place Making and Design**

Reference is made to the use of a Design Review Panel for all new important development schemes and proposals. Linby Parish Council supports independent design review, which will inform any design outcome to strategic allocations made in the local plan.

#### **Strategic Policy S6: Meeting Future Needs New Settlement: Land at Whyburn Farm, Hucknall**

This policy identifies the first of two new settlements proposed by the Local Plan. This proposed new settlement is of significant interest to Linby Parish Council, owing to the close proximity, adjoining the parished area.

Whilst Linby Parish Council appreciates that the Ashfield District Council must achieve its housing need, this proposed settlement is of serious concern, for the following reasons:

- It requires the release of a significant amount of green belt to the north-west of Hucknall. In effect is an urban extension to Hucknall. The coalescence of settlements and urban sprawl that this creates is contrary to the purposes of green belt.
- The collective impact of this scale of development in this location and its close proximity to a strategic site allocation for land at Top Wighay (in the neighbouring authority) will overwhelm transport and community infrastructure. Namely but not exclusively health care provision, highways, schools (with particular reference to secondary education), community facilities, sports and leisure and access to the open countryside.
- National policy prioritises brownfield sites and emphasises the need to create biodiversity net gain and deliver carbon-zero developments. This proposed site allocation would create unsustainable development, due to ....

The figure 7 Whyburn Farm High Level Land Use Concept Plan provides the indicative site context and layout for the redline area. This appears to demonstrate that the collective impact with Top Wighay has not been fully considered. The concept plan indicates part of this adjoining site marked in grey, but without recognising the full and true scale of the adjacent allocation in the neighbouring authority.

The following figure indicatively marks for context on the south area policy map the adjoining strategic allocations in Gedling Borough for context and how land at Whyburn Farm is an urban extension not a new settlement in the green belt. Please refer to the key for details.



### **Strategic Policy S9: Meeting Future Housing Provision**

The release of Green Belt land to enable the Whyburn Farm site allocation has not taken account of the wider impacts, as set out previously in this letter.

### **Strategic Policy S11: Aligning Growth and Infrastructure**

Clause 1 of this policy states ‘the Council will work with partners, neighbouring councils, infrastructure providers, developers and stakeholders’. For clarity Linby Parish Council has not been approached with regard to the proposed new settlement at and at Whyburn Farm. This is despite the significant impact on transport and community infrastructure within Linby Parish Council’s area.

We would highlight the importance of Ashfield District Council engaging proactively with Linby Parish Council on future planning matters.

### **Strategic Policy S12: Improving Transport Infrastructure**

Linby Parish Council supports the commitment to creating high-quality cycle routes and promoting sustainable transport options to reduce independent car journeys.

### **Strategic Policy S15: Protecting and Enhancing Our Green Infrastructure and the Natural Environment**

Green belt policy does not consider the landscape or natural environment quality or assets. This policy protects, conserves and where possible enhances blue and green infrastructure. There are many natural assets including wildlife corridors in the proposed urban extension at Land at Whyburn Farm.

## **Chapter 5**

This chapter also deals with protecting and enhancing blue and green infrastructure. It supports biodiversity net gain opportunities, encouraging these as an integral part of future development. Linby Parish Council supports these policies.

## **Chapter 6**

This chapter sets the growth strategy for housing delivery.

### **Policy H1: Housing Allocations:**

It is recognised that there is a prospective site allocation reference H1Hb Linby Boarding Kennels, East of Church Lane, Hucknall. The policy indicates an indicative number of 43 units, siting it as a combination of greenfield/brownfield land use.

For the reasons previously made in this representation the removal of green belt in order to create the allocation is of serious concern to Linby Parish Council.

The purposes of green belt 'to check the unrestricted sprawl of large built-up areas' and 'to prevent neighbouring towns merging into one another' are relevant to this proposed allocation.

The proposed site allocation to deliver 43 homes on the edge of Linby settlement would amount to urban sprawl. In effect it creates coalescence between Hucknall identified as tier 1 'main urban area' and Linby tier 5 'remainder of the district', this would merge the two settlements which are at opposite ends of the growth hierarchy.

## Conclusion

In conclusion, key issues are:

- The proposed site allocation of Land at Whyburn Farm, Hucknall is unsustainable. The allocation fails to take into account its cumulative impact on transport and community infrastructure and proposes the release of green belt as an urban extension to Hucknall a tier-1 settlement.
- The release of green belt land for the site allocation Linby Kennels, Church Lane, Hucknall would also undermine the purposes of green belt and is contrary to national planning policy and guidance. It would be creating urban sprawl and coalescence between a rural village and Hucknall.

Yours faithfully



Hannah Barter