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Nottingham City Council
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25th January 2023

Dear Consultation Team,

Consultation response Greater Nottingham Strategic Plan: Preferred Approach

Urban Vision Enterprise CIC are making representations on behalf of Linby Parish Council in respect of the Greater Nottingham Strategic Plan, preferred options.

Climate Resilience and Flood Risk

Each local authority within the Greater Nottingham area has declared a climate emergency and made commitments to achieving carbon neutrality. This has not yet sufficiently been translated through recent planning decisions on strategic site allocations within the parish.

Development at Top Wighay strategic site allocation should seek to make direct links into the Linby-Newstead disused railway as an active travel route. The Greater Nottingham Blue-Green Infrastructure Strategy, January 2022 highlights the importance of promoting active travel and the role of green infrastructure in supporting this. Recent applications have not included sufficient capacity to support active travel with tokenistic elements to reduce car travel. Given the capacity issues on the existing highway network the Parish Council strongly supports active travel to help mitigate the cumulative impacts of recent developments and those granted consent.

The Greater Nottingham Strategic Flood Risk Assessment Addendum of 2017 is 6 years old. It does not take into account more recent development and the cumulative impact, in particular reflecting that sites within Linby Parish have an ‘underlying geology that makes it susceptible to groundwater flooding’ and noting this as a constraint of the area (AECOM assessment, December 2022).

Natural Environment and Biodiversity

Under the Environment Act 2021 all planning applications will have to deliver at least 10% Biodiversity Net Gain (BNG), expected from late 2023. Linby Parish Council welcomes the updated mapping within the Greater Nottingham Blue-Green Infrastructure Strategy, January 2022.

This makes clear where the opportunities for enhancing existing green and blue infrastructure across the greater Nottingham area. Specific to Linby Parish this is critical to inform any future planning. This is of particular importance to the Top Wighay site allocated and safeguarded land.

It is noted from the mapping data provided that the parish includes:

- Grassland connectivity within Top Wighay and the disused railway line;
- Mire connectivity within Top Wighay and to the east of the disused railway line close to Linby;
- Woodland connectivity within Top Wighay and to the east of the disused railway line close to Linby;
- Grassland opportunities within Top Wighay and to the entire disused railway line; and
- Woodland opportunities shows extensive area in Top Wighay.

It is also noted that Linby Quarries is the only SSSI in Gedling Borough and the second largest in greater Nottingham at 38.69 Ha. Linby-Newstead disused railway is a Local Wildlife Site (LWS) one of five in the parish.

These key natural features and habitats contribute to the significance of the rural parish. The concern as echoed by Nottinghamshire Wildlife Trust is that there:

“ would be impacts on the following Local Wildlife Sites (Top Wighay Farm Drive, Top Wighay Road Grassland and Joes Wood).”

The Nottingham Wildlife Trust stated the need to consider cumulative impacts with adjacent existing strategic sites in the Aligned Core Strategy and also that the existing and proposed sites create a ‘major intrusion into the wider countryside’.

Given the sensitivity of safeguarded land and strategic allocations within the Parish we agree with recommendations from Nottinghamshire Wildlife Trust.

There are opportunities for Biodiversity Net Gain identified for those within the current strategic site allocation. If other land is being released, Biodiversity Net Gain requires detailed consideration.

Approach to Housing Need

Top Wighay Farm strategic allocation and the safeguarded land identified in the Gedling Borough adopted local plans Part 1 and Part 2 are translated into two sites identified in your strategy as G03.1 Top Wighay Farm east and G03.2 Top Wighay Farm north in the Greater Nottingham Strategic Plan. The Strategic Plan also identifies further land within G03 that extends beyond the Local Plan sites, but without any planning rationale.

It is noted in paragraph 2.32 that the Growth Options Study will be informed by the 'broad areas of search'. The plan identifies the current strategic allocations in the Parish (shown in red), one of which forms a small portion of the proposed area identified as G03.

The plan on page 30 is small and appears to demonstrate land that incorporates the strategic allocation, safeguarded land and additional green belt. However, there is no reference to further release for green belt for the Top Wighay area. The text suggests the site is a combination of only allocated land and safeguarded land, which is confusing and misleading.

The safeguarded land has not been released as a strategic allocation. Therefore, the presumption to demonstrate it as a proposed sustainable urban extension that is being masterplanned is premature. It identifies the sites as 'urban extension', without the land being released from the green belt. To pre-empt the outcome of green belt review is potentially unlawful.

The Response to Growth Options (February 2022) noted that Hallam Land Management made representations to state that Nottinghamshire County Council supported:

"An illustrative masterplan shows that the proposed development on the safeguarded land would deliver a minimum of 900 homes."

This would provide an indicative total housing figure for the strategic allocation and safeguarded land of 1,900 new homes, which equates to 26% of the borough housing in the Local Plan period to 2028, rather than the 14% identified in the Part Local Plan (see below).

The adopted local plan position is clear with the:

Aligned Core Strategy (Part 1 Local Plan), adopted September 2014

- Policy 2: The Spatial Strategy clause 3a identifies a housing figure of 7,250 from 2011 to 2028. The allocation for Top Wighay Farm in 3b of this policy is 14% of the

planned growth of the borough. Therefore it delivers more than a proportionate share for a small rural parish close to a large urban area.

- Policy 2: The Spatial Strategy clause 3b identifies 1,000 homes at Top Wighay Farm and makes clear the site is allocated through the Part 2 Local Plan. This does not include the Safeguarded Land.

Gedling Borough Local Planning Document (Part 2 Local Plan), adopted July 2018

- Policy LPD16 identifies Safeguarded Land Top Wighay Farm and an area there is no figure applied to the policy for delivery (46.8 Ha).

Summary

To summarise, we have concerns over:

- Pre-empting proper assessment of green belt release;
- Flood risk assessment is 6 years old and does not reflect the cumulative impact of recent applications, together with the site constraints within Linby Parish, which has an 'underlying geology that makes it susceptible to groundwater flooding';
- Encroachment on Linby Quarries SSSI;
- Lack of evidence and analysis on impacts on habitats and wildlife; and
- Lack of consideration of Biodiversity Net Gain.

We would also highlight that the proposed NPPF review, subject to consultation, has significant implications for the Greater Nottingham Strategy, including changes regarding the issues raised above.

Yours faithfully



Hannah Barter
Director/Partner