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Town and Parish Council Planning Service

F.A.O: Planning Policy and Research
Nottingham City Council
Loxley House
Station Street
Nottingham
NG2 3NG

3rd December 2024

Dear Consultation Team,

**Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
Consultation response Greater Nottingham Strategic Plan Publication Draft (Regulation 19)**

Urban Vision Enterprise has been asked to make representations on behalf of Linby Parish Council in respect of the Greater Nottingham Strategic Plan Regulation 19 consultation.

Each local authority within the Greater Nottingham area has declared a climate emergency and made commitments to achieving carbon neutrality. This has not been taken into account in the proposed site allocation for Top Wighay Farm, which now includes the safeguarded land. As drafted, the site allocation Policy 23 is deficient in multiple respects, as set out below.

Flood Risk

The Greater Nottingham Strategic Flood Risk Assessment April 2024 does not take into account surface water flood risk and its impacts. There have been recent incidents of extensive surface water flooding, including Wighay Road and Main Street in Linby, which became impassable. Without proper analysis of surface water, the Strategic Plan should not proceed.

In 2024, the Parish Council commissioned a report on surface water from a hydrologist. A copy of this is attached. This report should form part of the evidence base for the Strategic Plan.

Natural Environment and Biodiversity

The Environment Act 2021 requires eligible planning applications to deliver at least 10% Biodiversity Net Gain (BNG). Some recent Local Plans have required higher levels of BNG, especially for greenfield sites. Given the declared climate emergency by Gedling Borough Council and the sensitivity of the site, it is difficult to understand why a higher level of BNG has not been required for development of the Top Wighay Farm site.

Green Belt Release

The Green Belt Review, Appendix D, Gedling Borough Council, September 2024 includes analysis of the Top Wighay Farm site (Strategic Safeguarded Land). We would disagree with the 'check the unrestricted sprawl of settlements' purpose being given 2 out of 5, given the proximity to Linby village.

We note that the 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land' purpose has not been assessed. We would point out that the allocation of the Top Wighay Farm site, together with the other site allocations, have substantial implications for the viability of brownfield sites throughout Greater Nottingham, especially in the urban areas. This appears to be a fundamental failing in the report.

Transport

The site is in an unsustainable location with limited public transport options. We note figure 23.1 (Top Wighay Farm) indicates a link to the railway line, but it is unclear if a new station is proposed. We note in Policy 15 (Transport Infrastructure Priorities) that the Public Transport Improvements list includes 'NET extension Hucknall to Top Wighay Farm'. However, this does not appear to be shown on figure 23.1. This needs to be corrected, showing the position of the any new facility together with the associated operational land (including car parking).

The Parish Council commissioned a report on highway capacity 'Traffic Study, Technical Note, May 2023' by Bancroft Consulting (attached). This demonstrates that there are already severe problems with highway capacity. Development of the additional part of the site should be conditional on significant public transport improvements taking place. Past experience has shown that the piecemeal approach to developing the site has failed to provide sustainable transport options.

The Greater Nottingham Strategic Plan, Site Selection Report, Gedling, September 2024

The Greater Nottingham Strategic Plan, Site Selection Report, Appendix B, Gedling, September 2024 includes the assessment of Top Wighay Farm site. It is noted that the redline map and satellite image on page 15 shows a larger site area than that in the Policy 23 allocation. This is confusing and misleading. The additional land shown would have serious

implications in terms of green belt impacts. We would like to make clear that this additional land should not be added into the site allocation.

Policy 23: Strategic Allocation Top Wighay Farm

We have significant concerns over the drafting of Policy 23 including:

- The lack of clarity and ambiguity in the wording.
- The lack of distinction between policy and justification. Some of the policy reads as narrative or background information whilst the justification reads as policy.
- The lack of binding requirements relating to fundamental issues like environmental impacts, surface water and transport.

The policy needs to be redrafted to correct syntax errors and to provide a clear basis for decision making as required by the NPPF. The policy should set much more specific requirements for the following:

- Surface Water Flooding and run-off rates;
- Delivery and phasing of transport and community infrastructure (before occupation);
- Biodiversity Net Gain, with enhanced requirements for greenfield development;
- Green and blue infrastructure and wildlife connectivity;
- Pedestrian and cycle permeability and connectivity within the site and to the surrounding area;
- Urban design and public realm requirements (taking account of the emerging Gedling Design Codes);
- Design of recreational, sports and play facilities; and
- How to ensure impacts on heritage are positive.

Conclusion

We hope that this letter is constructive and can help to shape Policy 23 and the resulting development of the site. A placemaking approach is essential if the site is to be developed in a sustainable manner to meet the needs of current and future generations.

Yours faithfully

Hannah Barter
Director/Partner

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Bancroft Consulting, Traffic Study, Technical Note, May 2023; and
Dice, Top Wighay Farm, Hucknall, Drainage and Flood Review, February 2024.

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