

Appendix 1: Comments by Gedling Borough Council on the Ashfield draft Local Plan (regulation 18) and supporting documentation

Statement of Common Ground

1. Reference is made to the draft Statement of Common Ground (SOCG) which provides a record of the progress made regarding strategic cross boundary matters. Of note are the following agreements:
 - Nottingham Outer HMA Authorities will meet the objectively assessed level of housing required within their respective planning authority areas and that the Ashfield Local Plan is not required to accommodate any unmet housing requirements.
 - Nottingham Core HMA Authorities will meet the objectively assessed level of housing required across the HMA and that the Ashfield Local Plan is not required to accommodate any unmet housing requirements.

Comment

2. In relation to the duty to cooperate, there have been no discussions on the content of the draft Local Plan prior to its publication with the Greater Nottingham Authorities and no Statement of Common Ground has been agreed. It is noted that the published Ashfield SOCG is draft and will need to be finalised and agreements sought with the Greater Nottingham Authorities in time for the publication stage.
3. The intention of Ashfield District Council to meet its objectively assessed housing need is noted. In relation to the second bullet point above, at the time of writing the Nottingham Core Housing Market Area Authorities are considering options for meeting their objectively assessed housing needs and the Statement of Common Ground as noted above would need to be updated and agreed as work on the Greater Nottingham Strategic Plan progresses.

Paragraph 3.7

4. SOCG Parag 3.7 states that the proposed location (of the new settlement at Whyburn Farm) is also close to the district boundary with Gedling and their strategic mixed development at Top Wighay Farm. The paragraph goes on to refer to meetings with officers of Gedling Borough to consider the cross boundary implications of the proposed development but does not provide a record of dates or nature of these meetings.

Comment

5. The document correctly identifies the important cross boundary implications of planning for and coordinating growth and supporting infrastructure requirements in and around Hucknall. Gedling Borough Council notes that there were two meetings in the summer 2020 with Ashfield District Council advising of potential development opportunities in the Whyburn Farm area which were strategic in nature and with no certainty that the site would be included in the future development plan. We would welcome further

discussions on this cross boundary issue and propose a regular dialogue is adopted with appropriate records of the meetings kept and which can be summarised in the respective SOCGs.

Comments on the draft Local Plan

Site Allocations

6. The draft Local Plan includes the following Housing Allocations around Hucknall
 - Land at Whyburn Farm (S6) for 3,000 dwellings
 - Land north of the A611, south of Broomhill Farm (H1hc) 633 dwellings (in addition, phase 2 of Broomhill Farm has planning permission for 217 dwellings).
 - Linby Boarding Kennels (H1hb) for 43 dwellings (part of the site has planning permission for 12 dwellings).

Comment

7. It is not sufficiently apparent from the published evidence base how the overall strategy has been justified and it is not clear from the Sustainability Appraisal and Housing Background Paper why the two new settlements proposed are the preferred option.
8. A significant proportion of Ashfield's Housing need is planned or committed within and adjoining the sub-regional centre of Hucknall. The draft Local Plan also refers to the strategic mixed-use development site at Top Wighay Farm located on the edge of Hucknall within Gedling Borough. It is advised that the Top Wighay Farm site has been granted planning permission subject to the owners entering into planning obligations with Gedling Borough Council. Developer contributions are being sought towards:
 - Primary school education including the provision of a new primary school on site;
 - Primary health care;
 - Highways, public transport and cycling;
 - Affordable housing; and
 - Public open space and its maintenance.
9. Contributions toward secondary education will be secured through the Gedling Borough Council CIL Infrastructure list.
10. Gedling Borough Council notes the intention of Ashfield District Council to prepare a detailed infrastructure delivery plan to ensure the necessary infrastructure is in place to support the level of development being planned. Gedling Borough Council would welcome ongoing discussions to ensure

infrastructure requirements affecting Hucknall in particular are considered strategically.

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

11. Policy S6 proposes a new settlement is allocated at Whyburn Farm, Hucknall, as shown on the Policies Map for a mixed use development to deliver 3,000 new dwellings, 1,600 of which will be delivered within the plan period, along with approximately 13 hectares of employment land. Policy S6 identifies the necessary infrastructure to make the site acceptable in planning terms. This includes the following amongst others: an on-site primary school, contributions towards secondary school places, highway improvements, provision of public transport, cycling and walking facilities and green infrastructure. In a wider context, the supporting Infrastructure Statement makes reference to the potential need for a new secondary school should the expansion of existing secondary schools be insufficient.
12. Policy S6 also includes the potential extension of the existing NET tram link from Hucknall Town Centre (Hucknall North) through Top Wighay Development site in Gedling to the site as a possible requirement.
13. In order to identify the necessary infrastructure and to support its delivery, Ashfield District proposes to prepare a development framework, development brief/masterplan, green infrastructure strategy and infrastructure delivery plan.

Comment

14. There does not appear to be the same level of supporting evidence published for Whyburn Farm strategic allocation, as is the case for the Cauldwell Road new settlement under Policy S7 which was the subject of the Ashfield New Settlements Study (March 2021) . It is also the case that transport modelling has yet to be undertaken. However, it is acknowledged that this is a draft Local Plan under Regulation 18 and that further supporting evidence is in preparation. With specific reference to the potential tram extension into the Whyburn Farm site (via the Top Wighay Farm site) in the absence of transport modelling it is presently unclear whether the NET extension will be required as mitigation for the site and if so, whether this would be a viable proposal. . In this context, it is advised that a safeguarding corridor have been secured to provide for the NET extension into the Top Wighay Farm site. It was not possible to safeguard a route for an extension onto Whyburn Farm, as this could not be required for a site that was not yet allocated. The possible extension of the NET to Whyburn Farm would need to be progressed via an agreement between the landowners.
15. The intention to require a detailed infrastructure delivery plan for this site is strongly supported and Gedling Borough would seek to be engaged in this process given the close proximity of the Top Wighay Strategic site and

linkages between the two sites which are located either side of the A611 in this vicinity. The Infrastructure Delivery Plan would need to take into account the outline planning permission at Top Wighay Farm (and associated planning obligations) in combination with the Whyburn Farm proposals. It should also take into account other relevant commitments and allocations in and around Hucknall and the potential for future options for growth adjoining Hucknall within Gedling Borough, which may be identified through the preparation of the Greater Nottingham Strategic Plan.

16. A particular issue to address in the Infrastructure Delivery Plan and a topic for joint discussions between the two Councils is the need for the appropriate phasing of the proposed development at Whyburn Farm in relation to infrastructure provision taking into account the planning obligations and implementation triggers established by the planning permission for Top Wighay Farm.

17. A large employment land allocation is proposed at Whyburn Farm of approximately 13 hectares gross (11 hectares net). Whilst, Gedling Borough Council is supportive of sustainable mixed-use strategic sites a potential issue is the total scale of employment land planned in this locality once account is taken of the Top Wighay Farm planning permission (approximately 6.5 ha net). In this context, it is understood that a significant amount of vacant business space is also available at nearby Sherwood Park. There is a concern that the employment land market could become saturated in this locality. Further clarification about the justification for the quantity of employment space being provided at Whyburn Farm is requested and whether the entire employment allocation would be developed in the Plan period or alternatively that a proportion of this allocation is anticipated to be available beyond the Plan period.

Strategic Policy S8: Meeting Future Needs Strategic Employment Allocation Junction 27, M1 Motorway, Annesley.

18. Policy S8 proposes the allocation of about 38.5 ha of land in the vicinity of Junction 27 of the M1 for strategic distribution and logistics is noted and it is accepted that this is likely to fulfil a wider than district wide role in meeting needs for this type of development along the M1 corridor.

Other Housing allocations

Linby Village

19. Policy H1hb allocates land for 43 homes at Linby Boarding Kennels.

Comment

20. A potential concern is that the housing allocation could impact on the setting of the heritage asset Linby Village Conservation Area. The loss of the fields to development would result in considerable harm to the contextual setting of Linby as development encroaches from the west up to the immediate

boundary of the Linby Conservation Area at its southern end. The existing fields, their natural, aesthetic and rural character contribute to the historic significance outlined and therefore were the site allocation to come forward for development there would be a high level of harm to the historic and potentially evidential values the setting contributes to the significance of the conservation area. If the site were to be developed, there would be a change and sense that the village is losing its special identity and relationship with its surroundings. The level of harm would be medium in terms of aesthetic and communal values. In conclusion, the site would result in an overall high level of harm to the significance of the conservation area due to the potential change to its setting which makes a significant and positive contribution to its special architectural and historic interest. See also comments on the Green Belt assessment below.

Newstead Village

21. Policy H1kh allocates land West of Hucknall Road, Newstead for 47 dwellings. on land off Hucknall Road adjoining the settlement of Newstead. Background Paper 1 states that: this site will aid regeneration in the former mining village of Newstead, which is also constrained by Green Belt. The settlement is largely located within neighbouring Gedling District and the 'Broxtowe Borough, Gedling Borough, Nottingham City Greater Nottingham Aligned Core Strategies Part 1 Local Plan 2014' identified this as an area for regeneration.

Comment

22. The ACS does identify the former mining settlement of Newstead Village as a priority for regeneration. It is suggested that more detail is provided on the role of the site in terms of assisting in regeneration of this village in order to fully justify its allocation and release from the Green Belt.

Employment allocations

23. It is noted from the Ashfield Local Plan Employment Background Paper that the ELS 2021 has been used as the basis for the calculation of the employment land need. This is based on the past take up scenario set out in the ELS 2021 albeit adjusted by Ashfield officers. Adjustments are made to reflect that the replacement of future losses is likely to be less than that assumed by ELS and to take account of a very large single distribution development considered to be somewhat of an anomaly skewing the rate of past take up. The resultant need is approximately 84 ha of which approximately 31 hectares has been built leaving a requirement for about 53 hectares. The draft Local Plan allocates around 97 hectares. However, of this about 34.5 hectares are allocated as part of the Strategic Employment Area at Junction 27 intended for strategic distribution/logistics uses and likely to be of wider than district significance. The remaining allocations amount to approximately 58.2 hectares.

Comment

24. No comments on the individual employment land allocations with the exception of employment land allocated at Whyburn Farm where there is a concern that the total scale of employment land allocated at Whyburn Farm when combined with the planned commitments at Top Wighay Farm may saturate the employment land market in this vicinity (see comments above).

Strategic Policy 11: Aligning Growth and Infrastructure

25. The Council will work with partners, neighbouring councils, infrastructure providers, developers and stakeholders to facilitate the requirements for economic, social and environmental infrastructure to support development.

Comment

26. The commitment to work with partners and neighbouring councils is welcomed.

Strategic Policy S12: Improving Transport Infrastructure

27. Development will be supported and land safeguarded, where it improves the connectivity of and to the following:
- a. The Nottingham Express Transit System, including safeguarding land from Hucknall Station to the boundary with Gedling Borough as identified on the Policies Map.

Comment

28. Supported and complements the reciprocal safeguarded corridor for the NET extension to the Top Wighay Farm site within Gedling Borough secured by a planning condition albeit the planning permission is pending subject to the signing of a S106 agreement. However, turning back to the Ashfield Local Plan, the safeguarded land shown on the Policies Map identified on the Hucknall Inset Map does not appear to continue onto the main map (to the Gedling Borough Boundary as stated in the S12 Policy).

Strategic Policy 15 Protecting and Enhancing our Green Infrastructure and the Natural Environment and EV4 Green Infrastructure, Biodiversity and Geodiversity

29. This Policy seeks to establish, protect and enhance the network of green corridors.

Comment

30. General support. The identified green corridor network around the east fringes of Hucknall corresponds with the identified network on the Gedling Borough side of the boundary.

Evidence Base

31. The draft Local Plan is supported by the following key evidence based documents:

- Sustainability appraisal
- Background papers
- Green Belt assessments

Comment

32. Given that Hucknall has a strong functional relationship with the Nottingham HMA and is contained within the Nottingham and Derby Green Belt comments on the Local Plan supporting documentation are made in the interests of ensuring a consistent approach to strategic planning across the Nottingham Core and Outer HMAs especially in relation to the geographical location and function of Hucknall.

Background Paper 5 - Infrastructure Delivery.

Comment

33. Note that no IDP has been prepared as yet and that this will support the next stage of plan preparation. Welcome this commitment and would wish to engage with ADC on discussions around infrastructure in Hucknall.

34. GBC's Planning Obligations Protocol is relevant to these discussions, which sets out the protocol between GBC, its neighbouring Councils and the County Council for dealing with planning obligations between development within Gedling which would have an impact on the services and facilities in a neighbouring district.

<https://www.gedling.gov.uk/resident/planningandbuildingcontrol/planningpolicy/adoptedlocalplanandpolicydocuments/supplementaryplanningdocumentsandguidance/>

Study - 2016 Strategic Green Belt Review

Comments

35. Sets out the approach used in undertaking a review of the Green Belt in Ashfield as part of the Local Plan process. Noted that the assessment matrix included as Figure 2 reflects that used for the Green Belt review for the GNSP. The 2021 addendum refers to the four new site assessments around junction 27 of the M1 but does not otherwise update the methodology.

36. It is considered that in order to ensure a consistent approach to the review of the Green Belt around Hucknall there should be cross border discussions with GBC given the strategic nature of part 1 of the review, which considers broad areas.

37. It is noted that Assessment H01/Site 2 - Linby Boarding Kennels, Church Lane, Hucknall is one of the evidence documents informing the allocation of

this site for housing. The total score is 15 (out of a maximum of 20) and, as such, the site performs well against the five purposes of Green Belt. In addition, we disagree with the scoring of the fourth criteria, and suggest that this should be increased to a ** to reflect the role that the site plays in preserving the setting and special character of Linby Village.

Sustainability Appraisal

38. It is not clear from the document how the Council has arrived at its preferred option for growth. Table 5.4 sets out the summary of strategic spatial options, which is followed by a written summary of each option. The document then sets out the reasons for selection of the preferred option followed by reasons for rejecting the other identified options. This approach makes it difficult to make comparisons between the various options previously appraised in the SA and fails to establish a clear storyline of how the site selection process for allocations has led to the preferred option.
39. Reading is made difficult by the fact that Appendix H Appraisal of Site Alternatives does not provide explanation on why sites are given specific scores.

Strategic Housing and Employment Land Availability Assessment (SHELAA)

Comment

40. The SHELAA document focuses on Stages 1 and 2, which are site / broad location identification (stage 1) and assessment (stage 2). Stage 3 looks at windfall assessment and Stage 4 looks at assessment review and Stage 5 is the final evidence base. Para 2.2 states that stages 3,4 and 5 are provided in "separate reports". It would be helpful if a reference was included naming the specific reports and where these are available for example, for SHELAA reports appendices E to H; and for the housing windfall assessment the Housing Background Paper.
41. Para 4.39 looks at build rate assumptions. Is this based on Ashfield Housing Land Supply: Explanatory Paper (January 2016)? Should this be justified and supported by more recent or updated evidence?
42. It is noted that non-implementation rates have not been mentioned (see page 23).
43. Stage 2 Assessment Criteria in Appendix C provides the RAG scores however there is little explanation on why some criterion are given either a green, amber or red score. It is not clear how RAG scores are used in the SHELAA assessment and the SHELAA assessment reports do not include RAG scores. It is not very clear on how the SHELAA assessment are carried out.

Background Paper Number 2: Housing

Comment

44. Para 6.3 and Table 4 refer to the Councils assumptions regarding lead-in timescales – it would be helpful if the evidence for these assumptions are referenced in the document.
45. Paras 6.5 to 6.7 refers to annual delivery on large sites in “recent years” which the evidence is provided in Appendix 1. However Appendix 1 shows delivery information on only 13 large sites between 1 April 2013 and 31 March 2016. There is no information for recent years i.e. since 31 March 2016.
46. Para 6.16 and Table 6 refer to density figures and net developable area – there does not seem to be any justification to support them?