

Greater Nottingham
Planning Partnership



Report of Consultation Responses: Growth Options

February 2022



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Introduction

1. Background

- 1.1. Broxtowe Borough, Gedling Borough, Nottingham City and Rushcliffe Borough Councils published the Greater Nottingham Strategic Plan Growth Options document in July 2020. The consultation documents also included the Growth Options Study (produced by AECOM) and the Sustainability Assessment Scoping Report.
- 1.2. This was the first stage of producing the Strategic Plan and asked a series of questions on topics including housing growth, employment growth and economic development, climate change and carbon neutrality, city and town centres, the natural environment, urban design, the historic environment, safe and healthy communities, Green Belt and infrastructure provision.
- 1.3. The first consultation was undertaken for 10 weeks between 6th July and 14th September 2020. From 10th February 2021 to 24th March 2021 an extended consultation period was carried out after the Councils were made aware that some comments submitted by email had been blocked by security software and had not been received.
- 1.4. This Report of Consultation Responses provides a summary of the comments received as part of the consultations. It is structured based on the questions which were asked as part of the consultation. Not all respondents are individually referenced. However, a list of the respondents has been included as an appendix. Anonymous responses and respondents who did not provide GDPR consent are not listed within the appendix but the comments have been summarised. Two petitions were also received relating to R05 South of Orston and R07.1 Land at Regatta Way. The objections raised within the objections are summarised within the Report of Responses.
- 1.5. The Councils' response to the consultation will be added to this document and published as part of the next consultation on the Draft Strategic Plan.

Table 1: Number of comments received

Chapter	Question	Comments received
Chapter One Introduction and Vision	INT1: Vision and Spatial Objectives INT2: Evidence Base INT3: Strategic Issues	593
Chapter Two Overall Strategy	OS1: Urban Intensification Growth Strategy OS2: More-Dispersed Growth Strategy Option OS3: Green and Blue Infrastructure-Led Growth Strategy Option OS4: Transport-Led Growth Strategy Option OS5: Climate change OS6: Amount of New Housing OS7: Growth Options OS8: Other Growth Strategy Options OS9: Site Assessments OS10: Safeguarded Land	325 221 146 206 173 183 376 101 463 158
Chapter Three Green and Blue Infrastructure and the Natural Environment	GBI1: Strategic Green and Blue Infrastructure Assets GBI2: Strategic Allocations and Policies GBI3: Biodiversity Net Gains	294
Chapter Four Green Belt	GB1: Principle of the Nottingham-Derby Green Belt GB2: Approach to the Green Belt GB3: Offsetting Losses to the Green Belt	402
Chapter Five Working in Greater Nottingham	EMP1: Employment Land and Office Space EMP2: Office Development EMP3: Driving Innovation and Supporting Business Growth EMP4: Regeneration Priorities EMP5: Climate Change EMP6: Safeguarding Employment Land EMP7: Rural Area	437
Chapter Six Living in Greater Nottingham	H1: Affordable Housing H2: Housing Size, Types and Tenure H3: Meeting the Needs of Different Groups H4: Gypsies and Travellers	337

Chapter	Question	Comments received
Chapter Seven The City and Town Centres	CTC1: The Network and Hierarchy of Centres CTC2: Nottingham City Centre and the Town and District Centres CTC3: Acceptable Uses on the Edge or Outside of Centres	183
Chapter Eight Designing Good Places	D1: Achieving Well Designed Places D2: Conserving and Enhancing the Historic Environment	169
Chapter Nine Infrastructure to Support Growth	IN1: Infrastructure to Support Growth IN2: Priorities for Development-Funded Infrastructure IN3: Timely Provision of Infrastructure	241
Chapter Ten Any Other Issues	OI1: Any Other Issues	113
Totals		5121

Chapter One: Vision

1. **Question INT1: Vision and Spatial Objectives**

Are there any other issues the Vision and Spatial Objectives should address?

Summarised comments from statutory organisations

Amber Valley Borough Council considered there was an opportunity to strengthen and develop linkages between the Housing Market Areas in recognition of potentially wider benefits of joint working.

Aslockton Parish Council and **Gotham Parish Council** noted the decline in population due to a lowering in fertility rates and anticipated reduced immigration levels and that any development would need to address the changed needs of a population declining in numbers but increasing in age. Development in rural settings away from vital services would not serve these needs.

Barton in Fabis Parish Council, Ratcliffe on Soar Parish Meeting and **Rushcliffe Borough Council (Gotham Ward Councillor)** considered the Vision and Spatial Objectives cover the major issues to be addressed however most are vague when they must be precise, accurate and measurable. It was considered ensuring new development contributes to carbon neutrality should be expanded in view of the Nottingham City Council 2020-2028 Action Plan which seeks to make the City carbon neutral by 2028. In terms of providing for a quantum of homes this should balance economic aspirations with key environmental constraints, such as Green Belt and flood risk. Provision of the right type of homes to meet the needs of diverse communities including specific reference to setting targets for housing for more vulnerable members of the community is required. It was also noted the need to provide for vibrant and viable city and town centres including the opportunity for greater diversity of centres, individual character and less reliance on retail.

The importance of ensuring that new development provides net environmental gain was stressed and that new homes and premises should be well designed and make use of design codes.

It was also considered that the effect of Covid-19 on sustainable development should be addressed noting the issue is not limited to economic development but societal and behavioural changes, including but not limited to changing housing needs, travel patterns and reduced demand for retail.

Burton Joyce Parish Council considered the Objectives should ensure that smaller settlements such as villages are not negatively affected by new development. Investment is required in villages as, for example, Burton

Joyce has a Neighbourhood Plan but requires a budget. It was viewed that urban/rural fringes need to be protected.

Charnwood Borough Council were in general support of the growth strategy options and recognised that a combination of options could be required in order to address the range of issues and to meet sustainable development needs. It was noted that both R16 East Leake and R17 North Loughborough would look to Loughborough to provide services. The importance of the EMA to the regional economy was stressed in addition to the major development potential at the HS2 Hub Station at Toton and Ratcliffe-on-Soar power station.

Chetwynd: The Toton and Chilwell Neighbourhood Forum noted that the number of new homes should meet the needs of future population growth, not just the existing population. Biodiversity Net Gain as well as Net Environmental Gain should be considered as per the draft Environment Bill. In addition, transport networks or other infrastructure to support population growth should be used to reduce the carbon footprint and affect climate change in a positive way through sustainable development and active travel.

Department for Education confirmed local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure and noted the aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools.

The department noted that significant growth in housing stock in the Greater Nottingham Plan area will place additional pressure on social infrastructure such as education facilities and welcomes reference within the Plan to supporting the development of appropriate social and community infrastructure. The Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.

Recognition for the need for plans in each district to include clearer guidance on developer contributions for schools was welcomed and should meet the aspirations of the White Paper 'Planning for the Future'.

The **Environment Agency** offered support for the objectives and in particular recognising the impacts of climate change and mitigation. It was recommended that there should be a specific reference to flood risk.

Granby cum Sutton Parish Council noted the need to establish the maximum density of permitted housing and the minimum size perimeter green corridor in each neighbourhood plan.

Historic England were concerned that there was no specific reference to the Historic Environment and it should be included under guiding good place making reflecting local distinctiveness and character, conserving or enhancing the historic environment, to create sustainable places that people want to live and work in.

Homes England were supportive of the Vision and Spatial Objectives, particularly in respect to the quantum of new housing proposed during the plan period. It was considered that the development of Fairham could support the Urban Intensification Growth Option.

Keyworth Parish Council considered the growth options to be fundamentally flawed with respects to too much land being removed from the Green Belt for further housing in Rushcliffe Borough and, in particular, Keyworth. In addition, it was considered there was a lack of commitment to deliver accompanying infrastructure and services.

It was considered redevelopment of brownfield sites across Nottingham City should be the primary option for allocation for new housing and concern was expressed that there is a local and national issue with outstanding planning permissions not yet being developed.

It was viewed that trends in changes of use of City Centres, even before the pandemic, means that an assumption based on returning to Nottingham City Centre as before is flawed. On-line shopping rather than physical shops plus a reduction in population/space needed for offices mean brown field land around Nottingham could be redeveloped for housing with surplus office space also becoming free for conversion to residential use.

It was noted that new estates in Rushcliffe are already increasing dependency on cars at a time when environmental concern requires us to reduce dependency on cars.

Kingston on Soar Parish Council considered the Vision and Objectives vague and should expand on ensuring new development contributes to carbon neutrality.

It was considered that where providing for a quantum of homes key environmental constraints, such as Green Belt and flood risk, should be specified. In terms of providing the right type of homes to meet the needs of diverse communities a specific reference to setting targets for housing for more vulnerable members of the community should be made.

With respects to providing for vibrant and viable city and town centres the opportunity for greater diversity of centres, individual character and less reliance on retail should be included.

In terms of ensuring new development provides net environmental gain specific reference to the quantum of net-gain required by development (at least 10%) should be made in line with the Environment Bill.

It was considered that for well-designed new homes and premises clear design and material specifications are required, together with a masterplan and design code for all major developments.

It was also viewed that the effect of Covid-19 on sustainable development including changing housing needs, travel patterns and reduced demand for retail should be addressed.

Linby Parish Council noted the importance of the protection of the natural environment; protection of the historic environment; ensuring that the area is supported by sufficient infrastructure (transport and community infrastructure); and enabling more sustainable live work patterns with good connectivity to broadband.

Natural England noted the need for overarching objectives to increase Natural Capital and address climate change as it was considered these issues are relevant to many policy areas. Support was offered to addressing the causes of climate change and the mitigation of its effects; ensuring new development contributes to carbon neutrality; and development supported by Green and Blue infrastructure. It was suggested that the objective “Ensuring new development provides net environmental gain, including increasing biodiversity” should also include “and contributing to the Nature Recovery Network”. It was also considered that the objectives should include protection for designated sites.

Nottinghamshire County Council considered that there should be a clearer statement to combine healthier populations and health inequalities in the wider population, noting that the level of funding to provide services is key. The emphasis on the need for sustainable development was welcomed and the duty to secure socially necessary bus networks and the need for public transport provision as part of new developments was identified.

The County Council also wanted clarification over whether Hucknall is part of the consultation area as it was noted that potential development sites were listed in Appendix 2 and Hucknall should be incorporated within the Plan area as shown in figure 1.1.

Nottinghamshire Wildlife Trust welcomed the inclusion of climate change, carbon neutrality, net environmental gain and increasing biodiversity, sustainable transport, Green and Blue infrastructure as ‘issues’ in the Strategy. It was viewed it would be helpful to look at how well the previous iteration of the Greater Nottingham Core Aligned Strategy addressed environmental issues and see if any improvements could be made. The inclusion of the principle of Net Environmental Gain was also welcomed. Furthermore, it was viewed that increasing biodiversity should not be restricted to new development projects only, as there are many opportunities for incorporating biodiversity within other types of redevelopment and regeneration projects, as well as part of other types of projects and initiatives the Core Strategy may help initiate.

In terms of Climate Change causes, impacts and mitigation, consideration should be given to: flooding and extreme rainfall; impacts of drought and heat wave/hotter drier summers; energy usage; pollution (land, water and

air) and air quality to feature more prominently in the Plan; overall impacts of urbanisation, in terms of increased energy use, pollution, and traffic congestion, as well as potential destruction and fragmentation of wildlife habitat.

Papplewick Parish Council supported the concern with place-making and considered providing jobs and homes as worthwhile priorities.

Ravenshead Parish Council strongly support the need to reflect local distinctiveness and character.

Ruddington Parish Council and a **Rushcliffe Borough Council councillor** noted the importance of protecting the Green Belt between district centres/villages to maintain local and historical identity, and to protect against coalescence. Reference was also made to the importance of providing more frequent and accessible transportation for remote areas in order to reduce the use of private transport. Waste management and recycling facilities that would see an increase in users also require consideration. It was viewed that the Vision and Spatial Objectives should promote focusing development opportunities around key Public Transport investments.

Rushcliffe Borough Council three East Leake Ward members opposed growth at R15.3, R16, and R17. It was considered that developments surrounding the villages of West Leake, Stanford-on-Soar and Normanton-on-Soar would destroy their rural and historic setting. Housing growth at East Leake, with the addition of the Rehabilitation Centre, has stretched infrastructure beyond the limit and there are now issues with primary school places, the health centre, sewage infrastructure and capacity at road junctions connecting to the main highway system and can no longer be regarded as a sustainable location for growth. It was viewed that further development would impact on the character of the village.

Saxondale Parish Meeting noted the A52 between Saxondale Roundabout through to the end of Radcliffe on Trent is frequently congested or blocked. Further development proposals suggest more junctions onto this stretch of road which are neither practical or sustainable and will further exacerbate pollution issues and existing traffic congestion problems. Detailed impact and pollution studies should be undertaken.

St Albans PC noted serious concerns about the destruction of a Green Belt area considered an integral part of Bestwood Country Park. It was viewed that it would lead to pollution, loss of natural habitat, climate change, increase in traffic and lowering the quality of life. Concerns were also expressed about the lack of infrastructure and implications for flooding and wildlife in the area.

It was considered that development should be in urban areas with redevelopment on brownfield or building up rather than new developments.

This was considered more cost-effective post pandemic and beneficial for the high street of Arnold.

Tollerton Parish Council considered the Vision and Spatial Objectives laudable but lack the explanation and detail of the negative potential impact on existing and future communities to enable them to be understood and supported at this time.

Summarised comments from developers

Aldergate Properties Ltd considered that there was a strong case that at least the Hucknall part of Ashfield should be formally considered as an integral part of the functional Nottingham Core Housing Market Area and not excluded purely on administrative convenience.

Barratt David Wilson Homes welcomed a comprehensive approach towards spatial planning across “Greater Nottingham” however concern was expressed and clarification sought over the omission of Hucknall from the Strategic Plan area.

Stantec on behalf of **Barwood Homes** considered the Plan failed to be sufficiently aspirational in terms of stimulating economic growth especially in view of the importance the Government is placing on supporting housebuilding as a mechanism to promote economic growth, particularly in light of the economic slowdown resulting from the current Covid-19 pandemic. Importance of providing for the needs of projected ‘future’ populations and be more growth focused was noted.

Barwood Land questioned whether the Objectives are ambitious enough in light of the new ‘Planning for the Future’ White Paper and the standard method that would distribute an annual house building target of 300,000 new dwellings per year. This is significantly more than is being built to date, and in order to meet this target Plans need to be bold and ambitious in allocating housing sites.

It was noted that while the impact of the Covid-19 pandemic is still being understood, with peoples’ priorities changing it is important that the Plan is sufficiently flexible and responsive to enable the amount, and type, of growth required to be forthcoming to meet future needs.

Crofts Development Ltd noted that housing need should be determined through the standard methodology and demographic forecasts that underpin that process. The Vision should be clear that it is not just catering for the existing population. The references to generating sufficient jobs, places that people want to live and work in, being well connected and reducing the need to travel are all welcome.

Crown Estate considered that the Vision and Spatial Objectives could be broadened out to recognise the factors that should influence where development should be located including that that the principle of the Green Belt remains, and it will continue to shape new development. It was noted

that the distinctive role of key settlements should be recognised in a cohesive Vision and spatial strategy for both the urban and rural areas. Preference should be given to strategies that seek to reinforce self-containment and the functional role within the settlement hierarchy which is likely to be more deliverable and sustainable than creating new settlements or dispersed growth. It was viewed that the need to preserve and enhance the distinctive natural and built heritage by protecting and enhancing the historic environment and ensuring that landscape character is maintained and enhanced should be made clear. In addition, the importance of making the best use of existing infrastructure and the provision of new and improved physical and social infrastructure, where required to support housing and economic growth is essential. The Plan should be clear that it is working towards net zero carbon dioxide emissions.

Marrons Planning on behalf of **Davidsons Developments Ltd** and **Whitefields Farm** noted that housing need should be conducted using the standard method and a statement in the Vision is required to confirm that it is not just catering for the existing population. References to generating sufficient jobs, places that people want to live and work in, being well connected and reducing the need to travel were welcomed.

Boyer on behalf of **Gaintame Ltd** and **Strawsons Group Investments Ltd** considered an additional issue referring to the delivery and viability of housing development ensuring sufficient affordable homes meet local needs should be included.

Savills on behalf of **Gaintame Ltd** supported the commitment of the Vision and Spatial Objectives to “Providing for economic development that generates sufficient new jobs, moves the economy to one with higher value, low carbon credentials and contributes to the economic recovery from the impacts of Coronavirus”. It was considered that the Green Belt land should be re-assessed and those parcels which are unable to effectively contribute to the five Green Belt purposes should be released and allocated for development through the Local Plan review.

The benefits of HS2 were acknowledged and considered that the Vision and Spatial Objectives should endeavour to provide alternative locations for the homes and businesses that will be displaced when the new route is constructed.

Gladman considered that there should be coordination of the plan periods between the proposed Erewash Local Plan Review plan period ending 2037 and the GNSP end date of 2038. This will help to ensure co-ordination in objectives across all plan areas. It was also noted that subsequent Part 2 plans prepared by each individual authority should proceed as quickly as possible to ensure a consistent approach across the whole plan area.

Star Planning on behalf of **Mr Jonathan Greenburg** suggested that an additional Spatial Objective is that growth should be a means to support communities together with their services and facilities as supported by the

National Planning Policy Framework paras 72 and 78. Larger Settlements, such as Ravenshead, need growth and the additional population new homes bring to support the current wide range of local services and facilities that are available, including primary school, library, shops and other community facilities.

Pegasus on behalf of **Hallam Land Management** considered it critical that the housing needs of the Nottingham Core Housing Market Area are met in full over the plan period of the Greater Nottingham Strategic Plan, ensuring sufficient land identified within the Strategic Plan to deliver, as a minimum, the additional new housing required over the Plan's lifetime. It was considered that a stronger, bespoke issue be added to ensure large scale new housing and employment developments are delivered in close proximity, either through mixed-use schemes or ensuring employment and housing sites are co-located, to promote non car modes of travel. This would also respond positively to the climate change and carbon neutrality objectives.

Pegasus Group on behalf of both **Hallam Land** and **Nottinghamshire County Council** considered the Vision and Spatial Objectives of the Greater Nottingham Strategic Plan should align with the principles of the planning reform as communicated through the White Paper and any future legislation.

JW Planning and also on behalf of **Hall Construction Services Ltd** noted that the reference to the need to provide 'a quantum of new homes' should more closely align with the Government's objective of 'significantly boosting the supply of homes', and in light of the undoubted impact the Coronavirus crisis will have on housing numbers and the economy. It should be reworded as: 'Providing for a quantum of housing that significantly boosts the supply of homes which meets the needs of the existing/future population whilst balancing economic aspirations with environmental constraints'.

Geoffrey Prince Associates on behalf of both **Hammond Farms** and **Langridge Homes Ltd** considered the issues are general and not specifically well related to Greater Nottingham and considered a need to include an objective which relates to how the Plan will need to respond to lifestyle changes brought about by a desire for many to achieve a better work-life balance, technological developments and the impact of COVID-19. The respondent noted the increase in internet shopping resulting in a need for larger strategic as well as smaller, local distribution points; and a greater aspiration to live in a green and sustainable environment. It was viewed that these changes were likely to result in greater demand for houses with gardens and a reduced demand for flats/apartments, lower density living and a requirement for more land to be made available for quality development to create integrated neighbourhoods and communities served by good infrastructure with access to a more accessible countryside for future generations.

The importance of avoiding piecemeal development was stressed, often resulting in the release of the minimum amount of Green Belt land to meet development requirements, e.g. Willow Farm and Westhouse Farm, Bestwood.

Harworth Group considered the issues identified were appropriate and suggested the inclusion of an additional point ensuring new housing development is viable and deliverable and provides sufficient affordable homes to meet local needs.

Hollins Strategic Land supported the comprehensive range of issues identified in the Vision and Objectives but it was viewed that rural settlements within Greater Nottingham could become more sustainable and included the example of Aslockton. Concerns were expressed over the lack of affordable rural housing particularly with the ageing demographic.

Turley on behalf of **IM Land** considered that the Vision and Spatial objectives should identify specific issues around the ability to reduce vehicle trips and provide and enhance opportunities to fulfil day to day needs by active travel such as walking, cycling and public transport. It was recommended that the importance of new infrastructure and role in creating sustainable settlements should be highlighted. It was considered that the Vision and Objectives should acknowledge the need to release land from the Green Belt if housing needs are to be met in full and in sustainable locations.

Andrew Hiorns Planning on behalf of **Mather Jamie** agreed with the key elements of the Vision and particularly the need to ensure that growth achieves carbon neutrality. However, it was considered to meet this ambition within the Plan-period in 2038 in advance of the Government's stated commitment of 2050, may place additional requirements on this area compared with other competing locations. Sites close to the urban edge and locations on strong public transport routes, would meet the criteria and would include proposals at Catstone Green.

Marrons Planning on behalf of **Mather Jamie** noted that strategic policies should be informed by a local housing need assessment, conducted using the standard method in order to determine the minimum number of homes needed. It was considered that including a statement in the vision that only the existing population will be catered for is misleading. The strategy for homes and jobs needs to allow for connectivity beyond a city first focus which will be particularly important to the post-Covid economy where centralised working is likely to become more dispersed with people working closer to the communities where they live.

Parker Strategic Land Limited on behalf of **Mather Jamie**

In addition to the Andrew Hiorns comments reference was made to development opportunities on land to the south of Nottingham Road or in conjunction with the proposal for Catstone Green (Sites BO8.1,2, 4 and 7).

Key elements of the Vision were supported and particularly the need to ensure that growth achieves carbon neutrality or makes considerable inroads to this objective during the lifetime of the Plan.

Persimmon Homes considered that the local plan review should be concluded expeditiously especially as extant policies were adopted over five years ago. The Objective to provide for housing that meets the needs of the existing population must also ensure account is taken for new population and economic growth projections for Nottinghamshire. Further clarification as to why Ashfield DC and Erewash BC do not figure within this Greater Nottingham Strategic Plan process was requested. The Objective to provide the right types of homes to meet the needs of our diverse communities infers policy interference over market forces which should be carefully considered to avoid introducing conflict between a perceived need and actual market demand and impact on development viability. It was considered that good growth through well designed homes and premises should be allied to building regulations and the 'Future Homes' standards may emerge through the term of this plan which will impose new higher design standards. It was noted that higher standards than those currently sort nationally through build regulations must be supported by evidence.

Positive Homes Ltd suggested that "Ensuring new development contributes to carbon neutrality" should read "All new development will be built to net zero carbon standards".

Richborough Estates noted the importance that a commitment is made to meeting all development needs in full within the Plan area which must be undertaken having regard to the most up to date evidence and guidance. It was considered that the emerging options for the Plan should be sufficiently flexible to adapt to the anticipated changes, including both any increase in total housing requirements, and also the locational shift away from Nottingham City and towards the neighbouring Boroughs in terms of where those needs arise.

Fisher German LLP on behalf of **Taylor Wimpey** considered the Vision and Spatial Objectives should provide clear support for connectivity and transport and the Plan should therefore place high importance on ensuring future residents can travel as efficiently and sustainably as possible, given the high social, environmental and economic benefits associated. New development should be located adjacent to existing services, facilities and employment, or close to new or planned transport infrastructure and not isolated locations, with poor connectivity and access to public transport, as this will increase car dependency and social exclusion.

Savills on behalf of **Taylor Wimpey** confirmed that the emerging Vision and Spatial Objectives should seek to plan for at least the local housing need under the standard method and look to levels which encourage greater economic development.

William Davis confirmed that they had no objections to the proposed issues to be addressed in the Vision and Objectives.

Savills on behalf of **Wilson Bowden Developments** agreed with the broad approach of the Vision and Spatial Objectives and the commitment to “Providing for economic development that generates sufficient new jobs, moves the economy to one with higher value, low carbon credentials and contributes to the economic recovery from the impacts of Coronavirus”. It was proposed that greater consideration be given to the release and subsequent development of Green Belt land that is unable to effectively contribute to the five Green Belt purposes. It was considered that land should be released to meet employment land needs of the Greater Nottingham area during the plan-period. It was also considered that the proposed HS2 route has both physical and economic consequences to the area during the plan period and that the Vision and Spatial Objectives should seek to provide a more informed response to these issues both in terms of the Green Belt and the deliverability / need for employment land.

The company were also promoting site B08.5 Woodhouse Park for 130-150 units.

It was considered that as Erewash Borough Council are part of the HMA any under delivery should be addressed by all of the HMA authorities. It was viewed that a Statement of Common Ground should be produced to document cross-boundary matters.

Summarised comments from other organisations

Burton Joyce Climate Action group considered the Vision and Objectives needed to be more specific and measurable, for example "ensuring new development contributes to carbon neutrality" is vague and does not set high enough standards.

Burton Joyce Village Society supported the submissions of the Burton Joyce Parish Council, with particular emphasis on protection of the Green Belt and rebalancing of the local housing stock in favour of smaller dwellings.

Carlton and Gedling U3A noted a major part of the vision should be to bring into development or productive use derelict sites and brownfield sites, particularly which fall within developed areas.

Diocese of Southwell and Nottingham highlighted that Kate Raworth's doughnut economy model offers a useful structure, including what is the minimum standard that all should have and what is the maximum development that remains sustainable.

Home Builders Federation was supportive of a comprehensive approach to strategic planning across the whole of Greater Nottingham and that it should

encompass Broxtowe, Erewash, Gedling, Nottingham, Rushcliffe and the Hucknall area of Ashfield however Figure 1.1 excludes Hucknall from the GNSP area and inconsistent with the Vision and Spatial Objective of achieving comprehensive strategic planning across Greater Nottingham. It was noted that it should also include the co-ordination of plan end dates, noting the proposed Erewash Local Plan Review end date of 2037. It was stressed that it was necessary that future plan-making across Greater Nottingham be carried out as expeditiously as possible with the ACS, the Rushcliffe Local Plan Part 1 Core Strategy and the Erewash Local Plan all adopted in 2014.

Leaves of History considered that one objective should be to develop doctors, dentist surgeries and local amenities especially if new homes are being built.

Loughborough University considered that R17 is located within beautiful countryside with a special character, organic farms and a volunteer based disabled riding school as well as incredible biodiversity. Concern was expressed that the land was within flood plain, flooding annually and that building would reduce drainage and impact on Normanton.

Mapperley All-Stars Coaching noted the importance of creating the conditions to enable strong, cohesive and safe communities and a healthier population. The organisation is in need of a site for development for a new 3G football facility with the Lambley Lane site being the most favoured option.

Nottinghamshire Campaign to Protect Rural England suggested inclusion of how to enhance access to local green spaces for all but especially for those who currently have little.

Nottingham Credit Union considered there needed to be a reference to supporting the financial resilience of the population, particularly in the wake of Covid-19.

Nottingham Green Party stressed the importance of the development of a fully integrated transport system, ensuring that all new developments are well served with public transport. A comprehensive policy around the handling, reduction, reuse and recycling of waste that is capable of managing the waste produced by Greater Nottingham, without recourse to incineration was also proposed. In addition, reference was made to Local Sustainable Energy Production which should not include generation from the burning of waste which is unsustainable and harmful to the environment. The need to removing inequality in our society and the importance of affordable, desirable housing and a transport system that works for all was noted.

Nottingham Local Access Forum considered that objectives should include ensuring that sustainable transport links new and existing development and that provision for active travel (cycling and walking) is enabled. In addition, there should be a clearly stated principle which

promotes equality of ease of access to green spaces, housing, employment and services.

Nottinghamshire Ramblers noted the importance of improving the network of sustainable transport links for active travel within communities and between them.

It was also considered that there should be improvements to the green infrastructure network within communities and to the surrounding countryside to ensure everyone has access to opportunities to enhance health and wellbeing.

OSVAID (Orston and Surrounding Villages Against Inappropriate Development) considered that greater emphasis was needed upon early housing delivery, urban concentration and the re-use of brownfield land, in order to make full use of existing and developing transport links and infrastructure provision and in order to aid regeneration. The importance of increasing the supply of land available for new homes where it is needed to address affordability pressures, support economic growth and the renewal of our towns and cities, and foster a more competitive housing market in accordance with the Planning White Paper was noted.

The promotion of the stewardship and improvement of the countryside and environment, ensuring important natural assets are preserved, the development potential of brownfield land is maximised, net gains for biodiversity and the wider environment and actively address the challenges of climate change were all supported.

It was considered that economic growth, alongside regeneration and the re-use of brownfield land within the central urban areas can be supported, whilst the surrounding countryside and important environmental assets are protected should be more clearly reflected within the Vision and Spatial Objectives.

Pedals (Nottingham Cycling Campaign) considered the Objectives should include ensuring that sustainable transport links new and existing development and that provision for active travel (cycling and walking) was facilitated and promoted, for both utility (commuting, educational and shopping trips) and leisure use

Borough Councillor from the **Rushcliffe Green Party** welcomed the inclusion of climate change, carbon neutrality, net biodiversity gains and increasing biodiversity, sustainable transport, Green and Blue infrastructure as topics in the Strategy, providing realistic steps are taken to achieve change in those areas. In terms of Net Biodiversity Gain there should be a real commitment to achieving positive outcomes with measurable gains. Increasing biodiversity should not be restricted to areas of new development and should encompass redevelopment, as well as other projects and initiatives. With Climate Change mitigation emphasis should be given to flooding and extreme rainfall. Impacts of drought and heat wave/hotter drier

summers require addressing as well as energy use and production. Pollution (land, water and air) and air quality should feature more prominently in the Plan.

Sharphill Management Services considered that the provision of integrated green space, both local and strategic and the use of brownfield sites throughout the Plan area should also be addressed.

South West Nottingham Consortium considered that the plan period was suitable but that it should not be imposed rigidly at the expense of 'strategic' planning for the sustainable growth of Greater Nottingham, the full delivery of which may not be concluded until after 2038. The Strategic Plan should therefore not ignore opportunities for growth which go beyond the proposed period.

Tollerton Against Backdoor Urbanisation noted the importance of maintaining the rurality and character of older villages.

Trinity College promoted New Farm, Redhill as a location for future major residential led growth.

University of Nottingham considered reference should be made to the role of The University of Nottingham, as well as Nottingham Trent University, in supporting and delivering growth opportunities. The list of issues should be updated to include: "Ensuring the needs of both Greater Nottingham Universities are met, continuing to attract investment into the area".

Summarised comments from local residents

General Comments

One resident considered that the document should be written in language that is clear and easy to understand by lay people.

A number of residents commented on the need to take account of views of existing established communities in the early stages of decision making and take on board their perception of the impact of proposals.

One resident noted the importance of digital planning and need to ensure accessible interactive plans and policies.

It was questioned by one respondent how the Vision and Spatial Objectives would be adhered to and monitored. The importance of including precise measurable targets, ensuring new development contributes to carbon neutrality was highlighted.

One respondent noted that the White Paper 'Planning for the Future', August 2020, is likely to introduce changes to planning law before the Plan is adopted. One resident noted the need for a greater emphasis upon early housing delivery in accordance with the aims of the White Paper. The importance of increasing the supply of land available for new homes where it is needed to address affordability pressures, support economic growth and

the renewal of our towns and cities, and foster a more competitive housing market was noted. It was considered this should be more clearly reflected within the Vision and Spatial Objectives, to ensure that economic growth within established sustainable locations can be supported.

One respondent considered the Sherwood Business Park should be within the 'Greater zone'.

The national concern over the non-delivery of sites was also considered relevant in Greater Nottingham with the example of many of the sites agreed in the Rushcliffe Local Plan not being developed, including amongst others 3,000 homes South of Clifton but also three of the four sites agreed for Keyworth in the Local Plan part 2. It was also questioned why sites are being proposed when they had been previously rejected by the local plan process.

Climate Change

One resident noted that climate change, carbon neutrality, carbon sink restoration and net biodiversity gain must be the focus of the Plan.

One respondent noted the importance of addressing the causes of climate change and the mitigation of its effects. Another respondent suggested that new development must be carbon neutral or carbon negative and should more closely align with the Nottingham City Council action plan seeking to make Nottingham City carbon neutral by 2028.

One resident considered the Plan did nothing to combat climate change and noted that in the interests of climate change, carbon neutrality, and the right types of housing mix, we should not be demolishing serviceable and highly desirable buildings like bungalows. This was supported by another resident highlighting the need for the rejuvenation of old houses alongside new housing.

Another respondent considered that some of our housing stock is now getting quite old, is not energy efficient and that it was time to start considering the wholesale renewal of houses with more climate change friendly homes which offer appropriate space and living conditions for today's population.

Another respondent considered that new development should contribute to carbon neutrality with the need for electric transport, eco friendly building and green planting for the environment. One resident considered that the Objectives should include air quality and a Rushcliffe Borough Councillor noted that air pollution should be given specific consideration.

The importance of minimising impact of development on areas that were previously natural floodplain was noted, avoiding areas susceptible to flooding. One respondent specifically made reference to flooding being a major concern in Woodborough. Specific reference was also made to areas surrounding the River Trent including R07.1 and R07.2 which should be

safeguarded from development and promoted as valuable and accessible green space.

One respondent noted that a whole life cycle approach including operation and maintenance should be adopted. It was considered that the relevant objective should be reworded to ensure new development is carbon neutral to build, operate and maintain.

One resident flagged up the importance of growing crops locally.

Green Belt

Providing for a quantum of homes and economic aspirations need to be balanced with environmental constraints, including the maintenance of the Green Belt was raised. New development should provide net environmental gain including increasing biodiversity with clear targets required on how this would be achieved. A number of residents noted the importance of protecting and delivering green spaces particularly in view of the health benefits this brings as well as improving air quality.

The Government commitment to Green Belts was welcomed but it was considered this was not reflected in the draft Plan and should be rectified. Many residents considered the Green Belt should be preserved in its entirety and protect the area from urban sprawl and specifically protection between villages and the Nottingham conurbation to maintain local and historical identity, and to protect against coalescence. Concern was specifically noted by one resident that Ruddington will merge with Clifton, Bradmore and Edwalton.

Another priority raised was the inclusion of green corridors and green spaces as part of the urban planning e.g. to keep a green corridor for both wildlife and human social recreation needs between Beeston Rylands and the Boots Nottingham City development site.

One respondent stressed the importance of avoiding piecemeal development, often resulting in the release of the minimum amount of Green Belt land to meet development requirements. Another respondent noted that it may be better to build a new town rather than keep tagging on to existing urban areas and villages.

It was noted that Green Belt boundaries should follow defensible boundaries and not dissect gardens and should be continually updated, without the need for local plan review.

Brownfield Land

A number of respondents noted that greater emphasis should be placed on urban development and use of brownfield sites. Regenerating and revitalising brownfield sites, including with industrial/residential mix was noted. This could also include vacant retail plots. It was also noted that the loss of green space is unsustainable and that better use should be made of brownfield and abandoned sites within urban areas.

One resident considered that there was not a housing shortage and that there should be greater emphasis on re-using empty buildings in the city centre. Another resident noted by regenerating within city boundary would ensure using space more effectively.

Impact of Covid-19

A few respondents considered that anything published before 2020 needed a review in light of Covid-19 and how that has affected the region. The issue was considered not to be limited to economic development but also societal and behavioral changes, including changing housing needs, travel patterns and reduced demand for retail.

It was considered that with the pandemic there had been a significant shift in a move away from urban/suburban areas, towards more rural locations. With increased home-working, there is less requirement to live near to places of work, office and transport hubs and it was questioned whether we are building homes in the areas that people will want to live in the future. The desire for larger private gardens and gigabit internet connections was noted by many.

One respondent was clear of the need to provide for a quantum of new homes that meets needs of existing population, and balances economic aspirations with environmental constraints and contributes to the economic recovery from the impacts of Coronavirus.

One respondent noted the increase with on-line shopping even before the pandemic and that this should bring into question the future of the shopping centres. In addition, the increase in internet shopping will result in a need for larger strategic as well as smaller, local distribution points. The Government's commitment to making it easier to get change of use from retail to residential was welcomed and noted that the GNSP should allow for this.

One respondent noted that with the enforced working from home through the pandemic some office space is likely to become free for housing.

Economy and Town Centres

One respondent made reference to HS2 and that the fact that the core cities and the capital will have stronger links to each other making it easier for commuters to travel to work.

It was considered by one respondent that Brexit should be included as a significant influence with the likely reduction in economic activity and population growth over the medium term.

One local resident considered that growth should not be seen as a positive thing per se with individuals only generating slightly more GDP does not add

value. There should be an aspiration to create skilled jobs to bring value and wealth to the area.

One respondent noted that the location of development in relation to Nottingham will result in significant commuting to Nottingham, Derby and Leicester and the environmental impact due to the travel will be significant. It was considered that there would be more of an impact to aid the growth of Loughborough as an economical hub, as Nottingham is too far away without significant road and transport links being put in place which in turn will have an impact on the environment due to land use and pollution.

For the creation of jobs and to balance the needs to plan adequately for the future, it was noted that it would be preferable to have a strategic approach including the urban regeneration of brownfield sites in and around Nottingham city and its suburbs. This type of initiative would create more jobs with construction and development opportunities and although costlier in the short term, would provide for an increase in earnings in the area and the saving on transport infrastructure. It was considered that housing should be sustainably accessible to existing major employment areas.

Preference was expressed by one resident for growth to be focussed around the planned HS2 hub at Toton and the new Freeport near East Midlands Airport.

Reference was made to developing the area as a tourist destination and the importance of start-up and development of small-medium businesses.

Other economic development opportunities included the suggestion of becoming a graduate city noting the importance of retaining new graduates in the area was raised.

It was considered by one respondent that the objectives for a vibrant and viable city and town centres were vague and should include a clear statement of the unique selling points projected for each centre.

Infrastructure

One individual noted that the Vision and Spatial Objectives should stress the need to ensure the provision of all types of infrastructure is required to support 'good growth'. Green and Blue infrastructure was considered critical but need not be elevated to the detriment of, for example, critical social and community infrastructure. However, another respondent noted 'good growth' should be ensured by providing well-designed new homes and premises that are supported by the necessary infrastructure, especially Green and Blue infrastructure.

Providing the correct infrastructure especially transport, education and healthcare to existing residential areas without over burdening existing areas with better transport links was emphasised. Addressing waste management and recycling facilities that would see an increase in users was also raised. The issue of subsidence was also raised and impact on viability for building.

Another respondent considered that infrastructure should be considered holistically and not on a case by case basis. It was viewed that new developments should not rely on the use of a car to reach local amenities and sufficient planning for cycle routes and green transport should be included.

There was also concern about the intensification of traffic volumes, pollution and congestion that new development will bring to an area. It was noted that infrastructure south of the River Trent is already congested and there was a need for another river crossing. Associated safety issues with the crossing of major dual carriageways was raised.

Concern was expressed that new developments bring an increase in crime and antisocial behaviour to an area.

A number of residents noted the importance of providing more frequent and accessible transportation for remote areas to reduce use of private transport, while keeping the focus on sustainability of services. It was considered that Nottingham is one of the least car dependent cities in the UK with significant investment in public transport with a comprehensive bus and tram network and the Vision and Spatial Objectives should focus development opportunities around public transport networks.

One respondent considered that any development should be in line with Nottingham as a forward thinking 'green' city. Development should ideally be established on an existing or planned tram route, or very well serviced by other public transport. Any proposed development should not require people to travel by car to access this public transport.

One resident suggested that the potential of Nottingham Tollerton airport should be considered as a viable part of future low impact national travel particularly with huge advances in electric mobility and hydrogen propulsion systems.

It was viewed by one respondent that there should be more specific details about roads and transport with parking spaces in certain areas scarce. It was considered that free off-road parking should be provided by local authorities, which would benefit local businesses such as shops, cafés and restaurants. In addition, new roads should have cycle lanes.

It was considered that the Plan should not lose sight of the need to ensure that any growth to existing settlements is of a quantum and located and designed so as to ensure good connectivity within those settlements. Intra-settlement connectivity is critical to ensuring the need to travel is minimised and appropriate travel choices can be made.

One resident considered that sustainable transport should be at the heart of growth with the provision of more electric vehicle charging points. It was considered that there should be greater emphasis on reducing commuting and hence carbon emissions by building houses where the work is and then link by better public transport such as trams.

It was considered that the Vision and Spatial Objectives should include a specific statement that new developments are supported by infrastructure which encourages Active Travel, and allows car-free movement between developments and existing neighbourhoods, town centres and key facilities. It was noted that the term necessary infrastructure was vague and not confirm integration into existing networks and neighbourhoods.

One respondent considered the need for sustainable transport options to link into healthier population objectives and not simply 'reduce' travel.

One respondent suggested that verges should be planted with wildflowers, which would increase biodiversity, be visually attractive and pollinator-friendly and have a low maintenance cost.

Better Work-Life Balance

It was considered by another respondent that the Plan would need to respond to lifestyle changes brought about by a desire for many to achieve a better work-life balance, with technological developments resulting in people having and wanting more time available for recreation, leisure, family and community activities; participating in healthy living activities such as cycling walking, fitness and exercise and other recreational activities; and a greater aspiration to live in a green and sustainable environment.

It was viewed that these changes were likely to result in greater demand for houses with gardens and a reduced demand for flats/apartments, lower density living and a requirement for more land to be made available for quality development to create integrated neighbourhoods and communities served by good infrastructure with access to a more accessible countryside for future generations.

This issue was reiterated by another resident noting the importance of meeting public health recommendations and the development health enhancing environments.

The importance of building stronger rural communities was highlighted and the importance of providing play areas and green space.

Right Type and Amount of Homes

The importance of providing the right type and amount of homes to meet the needs of diverse communities was raised including the elderly and those requiring social housing and balancing the economic aspirations with environmental constraints.

Another resident noted the need to still have the option to choose to live in a vibrant city or quiet rural village rather than generic urban sprawl.

It was viewed that any new homes should be built sustainably and be eco-friendly; with solar panels, EV charging points, energy efficiency and low

carbon heating systems. Buildings should be arranged with south facing roofs as far as possible to increase the potential for solar energy capture.

Homes should also be built with greenery surrounding them with more green spaces created to offset carbon emission and pollution generated by the increase in population. It was also viewed that the Plan should provide for the consequences of a reduction in population growth and declining immigration.

Another resident noted the need for more affordable housing for local people with bungalows for the elderly.

It was considered by one respondent that well designed new homes and premises should be provided with clear design and material specifications, together with a masterplan for all major developments. This should be in keeping with existing properties in the area, especially if the area contains older properties and listed buildings.

Another respondent noted that good design should reflect the characteristics of Greater Nottingham and not one where Greater Nottingham becomes a replica of towns and cities across the rest of the country.

Guiding good place-making was noted, retaining and reflecting local distinctiveness and character, to create sustainable places that people want to live and work in, and that are well connected with the rest of the area to reduce the need to travel. One resident noted that if an area is over developed you will ultimately damage the reasons why people want and choose to live in the area.

One resident noted that the Vision should also consider the benefits of individual custom homes.

Natural and Historic Environment

A few respondents noted the importance of agricultural land and the impact on food and crop sources and the increase in carbon miles to import food and transport around the country should be challenged. Agricultural land was also considered important environmentally as well as for social or recreation purposes.

One respondent noted that the development strategy should seek to preserve and minimise damage and visual impact of the existing environmental, aesthetic, historic and amenity value of landscapes and seek to recognise areas that should be preserved. It was also noted that heritage creates a sense of identity and belonging and local heritage should be recognised and preserved as appropriate.

One resident expressed concern with respect to the impact on local wildlife. Reference was made generally and more specifically to the proposed developments at Calverton. It was viewed that biodiversity was essential and

should be the first consideration in view of the decline of a wide range of species native to the country/region.

Broxtowe Residents

One Broxtowe resident was interested in self build including land at Toton; the barracks; and land at the scout campsite on Moor Lane, Bramcote.

Gedling Residents

One Gedling resident noted the unsustainable and unfair plans for Calverton village and was concerned about the unnecessary destruction of Green Belt land and the guaranteed addition of at least several hundred cars which are dependent upon services/amenities outside the village. It was considered that the environment should play a larger role in this proposal especially in Calverton.

Rushcliffe Residents

One resident was against working with Nottingham City.

A number of residents noted the need for consideration of services, such as education and health, and the existing characteristics of the area. It was considered that Rushcliffe was already struggling for school places and additional housing developments would exacerbate this. It was also noted that Rushcliffe acts as a funnel for traffic into the city with associated traffic/parking issues especially around sporting events.

One resident noted that the infrastructure in Keyworth and West Bridgford was already under strain from recent new developments in the village and surrounding areas. It was viewed that plans for Rushcliffe looked excessive and would change the character of area.

It was considered that any additional building should take account of the existing road network and stress points on that network. Key junctions should be made safer in order to account for current traffic levels as well as additional traffic created by further house building.

A further consideration raised was the visible impact of development and associated wellbeing of people. It was noted that currently Belvoir Castle and the Jubilee Way running along Belvoir ridge attract many thousands of visitors largely for the open vistas out over the Vale of Belvoir with small villages and church spires dotted around. It was considered that large developments to the south and east of Bingham would be terrible blights on this area of outstanding natural beauty.

There was objection to additional developments in Cotgrave especially in view of the fact that the village does not have the infrastructure to cope with new houses. It was noted that Plumtree Road and the surrounding fields are renowned for flooding after even light rain. In view of the several hundred houses built at Hollygate Park, it was considered that the need for additional

housing in a small village was negligible. It was also noted that there are plans for a potential recycling centre and crematorium for the village.

It was considered that the proposed new houses would also distract the view from current houses on the perimeter streets - parts of White Furrows, Meansing Avenue, Barn Close etc. which would inevitably reduce their value even more so. It was noted that the fields adjacent to Plum Tree Road is attractive countryside giving a sense of open space and an attractive living area for residents.

One resident raised the specific issue of poor transport links in South Notts villages with the only Public Transport option being buses, which are considered unreliable and not frequent enough to serve Cotgrave.

Another resident made detailed comments concerning Health and Well-being in the area noting the vital link directly from the village to Cotgrave Forest and the Wolds, encouraging walking to experience the local area. It was viewed that any increase in urbanisation would mean that, especially for the elderly and those with small children, this would be curtailed, as most shorter walks will be mainly on suburban streets.

Specific reference was also made concerning the currently congested junctions at the Cross and at Plumtree/Owthorpe Roads. It was considered the narrow footpaths make it impossible for a parent to walk two-abreast with a child or an elderly person whilst passing the church.

It was noted that with the limited employment opportunities in Cotgrave itself, most new residents would commute elsewhere, even with a possible increase in homeworking, causing associated traffic congestion and increased pollution.

In addition, it was viewed that existing medical services would not cope with the current increase in population resulting from the planned housing to be built to the east of the village let alone further housing. It was viewed that inadequate doctors' surgeries were a blight on East Leake and Costock and capacity must be increased in order to support the current population.

It was viewed by one resident that East Leake has suffered more than enough expansion and from bad administration of planning projects and concern was expressed that there would be more of the same. Another resident flagged up that there is insufficient infrastructure with the village health centre unable to cope, and the sewage pumping station overflows raw sewage into the village and surrounding countryside regularly. It was viewed that there were issues with flooding, local wildlife habitats destroyed and concerns over the impact of additional traffic.

One resident noted that in 1901 Keyworth had a population of 789, it was accessed by five country lanes and had a train service from Plumtree Station taking 12 minutes to Nottingham. In 2011 the population was 6,733 with no train service and access by the same five poorly maintained country lanes. It was noted that the medical centre was already finding it difficult to cope even

before the already planned population increase and before the pandemic started. The importance of improving infrastructure before any further development should be considered was stressed.

One resident objected to the inclusion of Kingston on Soar R15 – R15.3 in the Plan.

A number of local residents objected to the building in the area R07.1 on the agricultural land to the east of Regatta Way, Lady Bay which is also within the floodplain and green belt. The area is frequently flooded with significant water levels, with development in the area being directly detrimental to mitigating the effects of climate change. Biodiversity, including the Skylarks nature reserve, would be lost and a reduction in green infrastructure provided by the open space which is currently viewed as a benefit to people's health and well-being.

A number of residents considered that the existing primary school should be retained and enhanced. It was viewed that moving the school to Regatta Way would remove the heart of the community and that building a senior school would require many pupils to cross into Lady Bay over a busy section of Radcliffe Road, increasing the risk of accidents. In addition, the proposal to move the primary school out of the centre of the neighbourhood would be counter to the 15 minute neighbourhood and lead to a high proportion of parents driving children to school having implications for air quality, activity levels, requirements for road repairs, impact on local shops, CO2 emission, quality of life and wellbeing factors. It was considered that the area prevents the urban sprawl of Lady Bay into Gamston and acts as a buffer from the noise and pollution from the traffic on A52. It was considered that air and noise pollution from congested roads such as A52 should be considered.

A number of residents considered that the garden village between Orston and Elton on the hill would significantly impact on the character of the area and the village of Orston in particular. This was due to traffic and congestion. Concern was also expressed with the impact on flooding.

It was noted that Orston Village is a Conservation Area and any plans to develop a garden village would be contradictory to the planning laws for the area. Concern was expressed over the abundance of wildlife that would be destroyed and a negative impact on the Orston Plaster Pits (SSSI). It was also noted that the A52 and Station Road is congested and unsafe and any associated increase in car and travel to city centre would increase CO2 emissions.

A few residents noted that given the Plan looks to discourage travel and CO2 emissions, major development should be concentrated close to the city wherever possible. As such to propose a major development 15 miles east, on prime agricultural land between Elton and Orston, with zero local infrastructure was illogical and inconsistent. It was also noted that part of the site is currently a productive solar farm that may be taken out of production by this proposal. Although one resident noted that limited development,

consistent with local requirements (e.g. a development of c20-50 houses) should be permitted.

One resident voiced objections to the proposed site north of Loughborough, R17.

One concerned resident objected to the proposal to build on organic farm land at Normanton on Soar. Another resident objected to the proposed settlement at Normanton on Soar/East Leake for a number of reasons including the loss of over 900 acres of high quality agricultural land and related loss of an ability to provide food security. In addition, there was concern over the loss of wildlife habitats and it was viewed that there was availability of brownfield land for development which should be prioritised including empty office space following Covid and decommissioning of Ratcliffe power station. It was also noted that additional infrastructure pressure, most of which would fall on East Leake is currently incapable of providing schools, doctors and facilities for the new housing they have sustained. It was also noted that there is already a proposal for 1500 homes between Cotes and Stanford on Soar which should be taken into account. It was considered that flooding issues would likely be exacerbated.

One resident was concerned about the environmental impact of building over green field sites in the Soar valley villages in Rushcliffe, with issues of flooding, lack of public transport networks and infrastructure meaning further congestion on the road network and CO2 emissions.

One resident noted that the Plan should promote parts of Plumtree, especially adjoining Pinfold Lane, for development.

One resident noted that plans for Ratcliffe on Soar plan does not mention the benefits of the local airport which is close to Nottingham City.

A number of residents were opposed to the building of more houses in Ruddington. It was considered that the village already has overburdened infrastructure which would not cope with more houses and more residents. It was noted that the Objectives should be more specific to the needs of the area, specifically parking and traffic control. Reference was made to the roads, difficult parking, amenities and services which currently cannot cope. It was noted that local schools are at capacity and doctor's surgery's oversubscribed. One resident specifically raised concerns with the 12.2 North Road proposal which is within the Green Belt.

Another resident considered that Ruddington will stop being a village, with no Green Belt to surround it and will be converted to either a commuter belt or an insipid town without the infrastructure required for amenities, shopping and leisure.

Another resident from Ruddington noted that there was a need to ensure that the most up to date information was included for approved developments in that the options of R12.1, R12.2, R12.3 and R12.4 does not

show new housing already planned in the near vicinity to these developments.

One resident specifically noted an objection to development in the Sharphill Wood area (R10.1).

2. **Question INT2: Evidence Base**

Do you think there is any additional evidence required to support the Plan?

Summarised comments from Statutory Consultees

Burton Joyce Parish Council were not aware of the requirement for any additional evidence.

Chetwynd: The Toton and Chilwell Neighbourhood Forum noted that the Chetwynd: Toton & Chilwell should be included in the list of areas with emerging Neighbourhood Plans in Figure 1.2 under Broxtowe Borough Council. It was also requested that clarification be given over which of the studies in Figure 1.3 specifically identifies and maps populations of vulnerable flora and fauna and protects those populations and habitats. It was also considered that the draft Environmental Bill should be included in order to set the tone and requirements for planning in the years ahead.

In addition, Nature Networks Evidence Handbook, 2020 and Natural England Research Report improving access to greenspace - A new review for 2020 should be added to the list of documents.

The **Environment Agency** recommended inclusion of the Humber River Basin Management Plan 2015 and suggested use of the environmental dataset for the area.

Historic England noted that Historic Impact Assessments may be required when preferred sites are identified.

Kingston on Soar Parish Council considered the following additions / amendments should be made to the evidence base:

- Analysis of the impact of Covid-19 on Greater Nottingham;
- Withdrawal of the current 'Growth Options Study' and redraft. The Greater Nottingham Growth Options Study July 2020 (GNGOS) is out-of-date and of reduced effectiveness following the changes we have and continue to experience as a result of Covid-19.

In particular, paragraph 1.34 arbitrarily states that "the study is "policy off with regards to Green Belt designation". It is noted that paragraph 1.34 states that consideration is built into "wider assessment criteria", but it is not explained how or what weight is given to these considerations.

In addition, it is considered that the methodology for assessing settlements within each section of analysis is unclear as are the conclusions.

Specific reference was made to a number of inaccuracies and limited analysis for Site R15 (A453 Corridor);

- Update Landscape Character Assessment and Green Belt Review; and
- Register of Brownfield Land.

Linby Parish Council considered information on heritage to be very generic even for a strategic document and there should be a greater focus on the distinctiveness of boroughs. It was noted that the economic and employment related evidence precedes the March 2020 Covid-19 lockdown which should be revised taking account of short, medium and long-term impacts. Evidence on community infrastructure needs to understand current capacity and where there are deficiencies in order to provide accurate up to date information on where new infrastructure is required.

Natural England suggested evidence should include the Nottinghamshire Biodiversity Mapping information and the 6C's Green Infrastructure – or other up to date GI strategy information.

Nottinghamshire County Council suggested inclusion of the following documents: Inherit – Triple Win; Marmot Review Implications for Spatial Planning; the Health and Wellbeing Strategy – Nottinghamshire Joint Health and Wellbeing Strategy 2018-2022; and Joint Strategic Needs Assessment – Nottinghamshire County Insight and Health in all Policies.

The County Council also noted that no evidence has been included on climate change including understanding the local impacts and commitments to reduce Green House Gas emission.

Nottinghamshire Wildlife Trust recommended inclusion of the following documents: Broxtowe Borough Council Green Infrastructure Strategy; Breathing Space - Revitalising Nottingham's open and green spaces (2010-2020); Rushcliffe Nature Conservation Strategy 2015-20; Nottinghamshire Biodiversity Action Group Biodiversity Opportunity Mapping for Broxtowe, Rushcliffe and the Sherwood Forest area; and 6CS Green Infrastructure Strategy (2010).

Orston Parish Council and a number of residents noted that overall, the information contained in the Growth Study Report relating to site R05 seriously overstates the potential of the site through error, omission and inadequate analysis.

Papplewick Parish Council wanted to draw attention to the aspirations of the Papplewick community in the Papplewick Neighbourhood Plan.

Ruddington Parish Council considered pre Covid evidence should be reviewed where applicable in order to understand how that has affected the region. Evidence should be up to date in order to accurately assess impact on the local area as, for example, the plan does not show all approved developments that are about to be undertaken such as in the Ruddington Village area.

Sport England noted concerns that some of the existing evidence was out of date and that any growth options should be considered against health impacts and the creation of healthy and active communities. Reference was made to Sport England's Playing Fields Policy and Guidance and that objections would be raised to allocations which impact upon or involve the loss of playing fields or other sports facilities which should be fully supported by appropriate needs assessment and replacement or mitigation for the loss as appropriate. Reference was also made to a Sport England, in conjunction with Public Health England, publication 'Active Design' (October 2015). This guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity.

Summarised comments from developers

A number of developers noted that an up-to-date Green Belt Review should be undertaken to provide a comprehensive review of the Green Belt around the whole Greater Nottingham area.

Aldergate Properties Ltd considered there should be an assessment of the White Paper and the drive for growth is undertaken together with the revised Standard Methodology calculation to ensure that sufficient housing is delivered within the Plan Area during the plan period. More evidence is needed as to the contribution which Ashfield can make to housing supply.

John Breedon considered the evidence should take account of an update to the SHLAA and that land north of Abbey Lane, Aslockton, should be assessed as part of the SHLAA as a suitable site, either in whole or part, to accommodate housing.

Barwood Land considered that it would be necessary to update the Nottingham-Derby Green Belt Review which has not been updated since 2006 and the new Green Belt Assessment should be undertaken specific to the scale of individual sites that may be required rather than large areas of search.

The developer was promoting a current Green Belt site at Middlebeck Farm, Mapperley which it was considered would not result in unnecessary sprawl nor have a significant detrimental impact on the purposes of the Green Belt.

Crown Estate considered the plan needed to address Green Belt policy and be underpinned by a cohesive spatial strategy which reinforces the different functional roles of settlements within the plan area. Greater clarity on the level of growth and distribution that is being planned for is required including

the scale of new development, above existing commitments, needed to 2038 and beyond.

Additional evidence will be required in relation to carbon neutrality in terms of what is meant, impact on deliverability and role of strategic allocations.

Marrons Planning on behalf of Davidsons Developments Ltd and Mather Jamie Ltd noted that consideration should be given to planning for a longer period particularly in respect of the evidence gathering and to ensure its longevity – to at least 2040 as a minimum. It was noted that strategic policies should be informed by a local housing need assessment, conducted using the standard method.

It was viewed that there are exceptional circumstances that justify the release of land from the Green Belt including safeguarding on the basis that a buffer will be required. It was noted that the requirement to identify the 'most appropriate' growth strategy was a higher test from the NPPF 2012 and no longer forms part of the soundness tests.

Boyer on behalf of **Gaintame Limited, Harworth Group and Strawsons Group Investments Ltd** considered the evidence base for the GNSP should be extended to include a unified housing trajectory and information on housing supply for the five authorities against housing requirements for the Plan area. This should include regular assessment and information on the delivery of key strategic sites and would assist in monitoring the implementation of the Plan.

Gladman noted that policy requirements surrounding optional technical standards and prescriptive housing types and tenures must be justified through detailed evidence. The spatial growth strategies should be justified through the site selection and sustainability appraisal process.

Geoffrey Prince Associates on behalf of both **Langridge Homes Ltd and Hammonds Farm** noted the requirement for strategic multi modal transport assessment studies along transport corridors where significant growth is likely. An assessment of emerging lifestyle changes and how these changes are likely to impact on land use planning policies, proposals and also priorities for infrastructure improvements was also highlighted. It was considered that there should be no need for the authorities to commission studies to determine future housing requirements as the Government has indicated that they will provide these figures to the local planning authorities using the standard methodology.

Hollins Strategic Land considered that the current evidence base was precluding the proper consideration of sustainable alternative sites and in particular land in the Aslockton area which is located along the Nottingham-Grantham line corridor and accommodates a railway station which should be given significant weight. It was viewed that the Aecom study focus on strategic sites above 1000 dwellings may unfairly influence reasonable alternatives below 1000 dwellings at this early stage. It was noted that the NPPF makes no distinction between strategic and non-strategic sites. In addition, it was noted that the Study recognised that settlements along the

A52 corridor may benefit from future strategic infrastructure improvements making them more accessible in the long term. It was considered that the Plan's evidence base should fully assess the role and benefits that small and medium sites can contribute to the Plan.

Andrew Hiorns Planning on behalf of **Mather Jamie Ltd** considered that it was not clear where the impacts and potential of HS2 have been accounted for in the evidence base. Also the need for a local nature recovery network assessment that identifies how and where proposals might be directed to enhance and restore biodiversity across the Plan area and period.

Grace Machin Planning and Property on behalf of both **OSVAID (Orston and Surrounding Villages Against Inappropriate Development)** and **Mr S and C Voce** considered the recently published Government White Paper, 'Planning for the Future', August 2020 which sets out the Government's priorities for a fundamental reform of the planning system to address its underlying weaknesses and to create a system fit for the 21st century should be included.

Oxalis Planning on behalf of **unnamed landowners and developers** noted that more recent UK Government publications have further highlighted the weight to be attached to delivering development in a sustainable way which helps meet wider ambitions to help address the challenge of climate change. The 'Decarbonising Transport: Setting the Challenge' document (March 2020) outlines the importance of access to good public transport and active travel options (walking and cycling) to help meet people's needs, improve mobility and also reduce Greenhouse Gas (GHG) emissions. In addition, the 'Planning for the Future' White Paper (August 2020) proposes a new 'sustainable development' test to ensure Local Plans strike the right balance between environmental, social and economic objectives.

Andrew Hiorns Town Planning Ltd on behalf of **Parker Strategic Land Limited** considered the evidence base sufficient to inform the plan.

Persimmon Homes noted the need for a detailed greenbelt review of all neighbouring Nottinghamshire Local Authorities. Where prescriptive market housing mix or increased build standard policies are sort further evidence must be provided to support and justify such requirements. In addition, the Standard Methodology employed to determine Local Housing Need must be updated to conform to current government guidance which is presently subject to consultation.

Oxalis Planning on behalf of **South West Nottingham Consortium** noted that the plan period of 2018 – 2038 follows guidance within the National Planning Policy Framework (NPPF) which requires Local Plans to plan over a minimum 15-year period from adoption. Whilst this is a suitable period to plan for development requirements it should not be imposed rigidly at the expense of 'strategic' planning for the growth of Greater Nottingham, and the inclusion of sustainable directions for growth, the full delivery of which may not be concluded until after 2038. This would ensure that the Plan can

deliver a long term strategy allowing for long lead in times for large strategic sites.

Savills on behalf of **Taylor Wimpey** considered a review of Green Belt should be undertaken as part of evidence gathering to inform the Strategic Plan.

Savills on behalf of **Wilson Bowden Developments** considered the Green Belt study to be out of date and should be updated. It should address the proposed route of HS2 which could provide a new defensible and permanent Green Belt boundary.

It was also noted that an urban capacity assessment should be undertaken for the Greater Nottingham authorities in order to demonstrate whether there are enough brownfield sites to meet housing needs.

Summarised comments from other organisations

The **Home Builders Federation** reminded the partnership as set out in the 2019 National Planning Policy Framework (NPPF), that all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. If policy requirement options such as optional technical standards and / or prescriptive housing type / tenure mixes are to be pursued, detailed additional evidence to support and justify such policy requirements should be gathered.

Nottingham Open Spaces Forum would like to see stronger evidence base and reference to biodiversity net gain principles e.g.: <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

Pedals recommended the inclusion of: The D2N2 Local Cycling and Walking Infrastructure Plan in view of its importance in defining the priorities for the future Cycling and Walking Network for the Greater Nottingham area. It was also suggested that the following DfT documents should be included: “Decarbonising Transport Setting the Challenge”, March 2020; “Gear Change: A bold vision for cycling and walking”, July 2020; and “Local Transport Note 1/20: Cycle Infrastructure Design”, July 2020.

A local **Rushcliffe Councillor** noted concern over the accuracy of maps for Ruddington area, where current housing estates that have been forced through the Local Plan part 2 are not added to the map of proposed areas around Ruddington.

Rushcliffe Green Party proposed the inclusion of: Rushcliffe Nature Conservation Strategy 2015-20; Rushcliffe Biodiversity Opportunity Mapping Exercise; East Bridgford Conservation Strategy; and Trent Corridor Green Infrastructure Studies, including the 6Cs Study of the Trent Valley.

The **Sharphill Action Group** suggested the inclusion of the TCPA/RTPI Guide for Local Authorities entitled: ‘Planning for Climate Change’ [TCPA 2018] where section 4.2 on the appropriate evidence base for plan making

explains good practice. Another relevant document recommended was the D2N2 Low Carbon Plan of July 2015. It was also considered that there was a case for commissioning a report to examine how effective the sustainable urban extensions released in the previous Strategic Plan (and carried forward into currently approved local plans) have been in achieving sustainable living areas/ lifestyles and carbon reduction measures.

Summarised comments from local residents

A number of residents considered the document was flawed in a number of areas and contained information which was inaccurate, out of date and/or misleading. Concern was expressed that a lot of evidence is more than five years old. It was also considered that the Plan failed to include vital information which should form part of the suitability of assessment areas. It was viewed the conclusions it reached were void given they are not derived from accurate information or analysis.

One respondent considered that there had not been a platform for local people to help shape their surroundings and it was not in plain English or in an accessible or user friendly format. It was also noted the failing to recognise meaningful community areas such as Lady Bay. It was viewed that locals in all areas are well placed to add historical information to a number of areas such as flood and traffic management and road safety.

One resident specifically noted inaccuracies and omissions for R15. Another resident noted similar concerns with development planned around Ruddington village.

One respondent expressed concern that changes to the Green Belt boundary agreed through the Gedling Local Planning Document in Burton Joyce had not been identified in the Growth Options document.

One resident requested a landscape assessment and assessment should be made on the impact of a reasonably size village such as Ruddington being surrounded on all sides will have on the existing population.

The impact of flooding was raised and need to have the results of all flooding assessments and flood defence proposals. It was considered that there is evidence that present developments are adding to flooding of properties downstream.

Trees were also considered by one resident to be an essential part of reducing the impact of climate change and surface water flooding and specifically the vitality of woodlands needs caring for and expanding both at Sharphill and Edwalton Golf Course.

One resident suggested that there should be a review of the impact of the urban extensions in the current plan period. Specifically, whether they really have created sustainable lifestyles? Whether they have contributed to carbon reduction and micro-energy measures? Whether the consideration of downstream flooding has been strong enough?

It was noted that to remove Green Belt land requires exceptional circumstances and one resident was not satisfied that expanding further urbanisation is justified at the expense of the two green lungs of West of Sharpill and Edwalton Golf Course. Concern was expressed that developments do not protect and create any compensatory green spaces on the grounds of poor viability.

In response to the Coronavirus, several residents expressed the view that any evidence published before 2020 should be reviewed to understand how the pandemic has affected the regional and Greater Nottingham. It was noted that much of the data is based on the 2011 Census. Also in relation to the pandemic, it was noted that the retreat from retail and commercial uses in the city centre should lead to a reappraisal of the need to expand the developed area into the Green Belt. Reference was also made to the need to reflect changes in working patterns and needs following COVID-19.

It was viewed by one resident that there was insufficient research into post pandemic employment with small and medium businesses being forced to close or gone bankrupt.

Lack of space for young people to gather legitimately, lack of community centres and viable small shops was also noted. It was considered that gardens that were too small for individual families. Concern was expressed over eyesore estates that lack character and have low environmental credentials.

One resident did not consider that there had been clarity over what would be displaced or lost by development.

It was also considered that the alignment of plans going forward was lacking.

Specific mention was made of the need to update existing evidence documents, including: -

- Landscape Character Assessment;
- Register of Brownfield sites; and
- Nottinghamshire Historic ER.

One resident highlighted the need for realistic financial support for villages that are becoming towns with crumbling infrastructure such as East Leake.

Reference was also made to the need for existing Local Plans and Neighbourhood Plans to be main components of the evidence base and specific mention was made by a few residents to the Ruddington Neighbourhood Plan.

In relation to transport issues, a number of residents noted that the Plan should use the most up to date information taking account of approved developments, citing the Ruddington village area as an example. In addition, a review was needed of future rail services, the capacity of the A52 east of Radcliffe on Trent and the frequency of train services and bus connectivity.

In relation to climate change, a few residents noted the need to understand what the baseline carbon figure is to help understand the gap from the net zero carbon target. It was suggested that each aspect of the Plan should include a statement on reducing carbon emissions. In addition, critical national and international reports need to be taken into account, for example the WHO report of October 2018. Account should also be taken of the new report on the loss of wildlife https://www.wwf.org.uk/sites/default/files/2020-09/LPR20_Full_report.pdf

The Strategic Plan should reconsider the emphasis on growth and aim instead to de-carbonise the local economy to meet climate change targets. A number of residents suggested that the Plan should be consistent with the aims of the Nottingham 2028 Carbon Neutral Action Plan and that there needed to be more information on air quality issues, noise reduction, sustainable local food production reports as well as having good access to high quality public transport.

A number of residents flagged up the importance of flood assessments and that sites within a flood risk zone should be avoided.

It was considered by a number of residents that East of Lady Bay was unsuitable for development and that the evidence was lacking as it is an area which is prone to flooding as well as being an area of natural beauty, important for wildlife, recreation and leisure area for well-being.

One respondent noted the Plan should reflect the latest thinking on the UK population trajectory and demand for homes.

It was noted that the health benefits of the open areas should be measured and local people should be asked how they use their local area and open spaces

3. **Question INT3: Strategic Issues**

Are there any other Strategic Issues we should consider?

Summarised comments from statutory organisations

Burton Joyce Parish Council considered the document to be comprehensive.

Chetwynd: The Toton and Chilwell Neighbourhood Forum noted that disturbance caused by developments should be minimised by, for example, the use of Modern Methods of Construction. It was considered that the use of Area Development Orders to set out the timeline and order of build out of development would be beneficial.

The strategic importance of public health in the planning for green space, both quality and quantity was noted and the minimum requirements of 10% biodiversity net gain should be included in the Plan. It was noted that there was no mention of the HIF Bid for the Toton SLG/EM Hub Station.

The **Environment Agency** recommended that flood risk should be considered across the whole area rather than in local geographies noting the opportunity for a strategic view across local authority boundaries.

Kegworth Parish Council raised boundary issues with respects to green amenity space noting that it adjoins Rushcliffe Borough to the South West and wishes to be fully consulted on and included in future cross boundary consultations alongside Leicestershire County Council and North West Leicestershire District Council.

Specifically, interest was noted with respects to being a statutory consultee in relation to any planning application for the Ratcliffe-on-Soar Power Station site.

It was considered that Kegworth forms a natural area of green amenity space for proposed development between Clifton and the Ratcliffe-on-Soar Power Station, much of which is a floodplain, and bounded by the M1, the River Trent and the Eastern watershed of the River Soar.

The Parish Council supported the creation of new employment opportunities on brown field sites such as Ratcliffe-on-Soar Power Station site and welcomes the emphasis on leading edge Science and Technology in collaboration with local universities to create skilled and well paid jobs. Brownfield sites elsewhere in the City are preferred for business, industrial and warehouse use over green field sites along the A453.

The Parish Council recognised that only close collaboration between LCC/ NWLDC, GNP/Rushcliffe, the proposed East Midlands Development Corporation and Midlands Connect/HS2 will ensure that Kegworth village and Kingston village retain their character. Sprawling ribbon development from Clifton up to or beyond the River Soar boundary should be avoided and the green amenity space to the West of Kingston should be enhanced.

Linby Parish Council emphasised that issues such as built heritage are not just about protection but also other dimensions such as heritage-led regeneration.

Natural England noted that the Nature Recovery Network should be considered within the Strategy. This is an initiative arising from the Government's 25 Year Environment Plan to enhance strategic level ecological networks.

Nottingham Wildlife Trust recommended that greater emphasis be given to the natural environment in line with the NPPF. An overarching policy as to how proposals will be considered in terms of whether they constitute 'sustainable development' was welcomed. It was noted that for biodiversity, the 'mitigation hierarchy' in the NPPF should be followed. It was suggested that the Plan needs to be adaptive and able to respond to fast changing and unforeseen situations, such as Broadmarsh, Covid and rapid social and economic changes. The importance of access to the countryside and green

spaces in terms of health and wellbeing was stressed. The Trust would like to see an additional reference to use of natural systems to help mitigate against flooding and the principles of 'ecosystem services' and Nature Recovery Networks.

Papplewick Parish Council would like to see aspirations for the development of an integrated network of safe walking and cycling routes as an integral part of the Strategic Plan.

Ruddington Parish Council noted that the Greater Nottingham Strategic Plan indicated that there is sufficient housing supply already identified until 2038. Need identified as 51,580 against the current estimated supply of 53,264.

Saxondale Parish Meeting highlighted the need for A52 link road which would relieve pressure of the single carriageway of the A52 between Bingham and Radcliffe on Trent, open up easier travel links to Leicester and Newark. If combined with a park and ride off of the A46 near Stragglethorpe this would be beneficial to the whole local area.

Severn Trent – Sewerage Management Planning were supportive of the vision to develop in a carbon neutral way, minimising the impact of development on the environment and noted they are looking at their own process to become carbon neutral as a business. However, it was stressed that the treatment of water for consumption and treatment of wastewater will utilise vital resources including energy. The delivery of Water Efficient properties can also result in carbon benefits through the reduced need to process water and treat waste.

Sport England considered that the Plan should define what is meant by 'strategic infrastructure' and clarify whether it is the provision of new infrastructure or protection (enhancement) of existing.

Tollerton Parish Council noted the ongoing response and recovery from Coronavirus forms a further strategic issue for consideration, potential one necessitating a very different form of sustainable development with local shops and facilities (such as those in a short walk or cycling distance) increasing in importance for communities; home working or local drop in offices replacing travel to large corporate headquarters; and the acceleration in the death of the traditional high street creating exciting opportunities to redesign town and city centres for greater mixed use for accommodation, retail, green space and leisure.

Summarised comments from developers

Aldergate Properties Ltd considered in view of the significance of HS2 to the future economic prospects of the conurbation that this should be a highlighted strategic issue within the Plan particularly in respect of the western parts of the HMA.

Andrew Hiorns Planning on behalf of **Mather Jamie** considered there is a need to identify explicitly how sustainable development was determined and the weight put on each of the environmental, social and environmental objectives. This was considered especially significant if the Government decides that Sustainability Appraisal is no longer a requirement of the plan-making process.

Stantec on behalf of **Barwood Homes** highlighted the need to be aspirational in order to meet the Government's economic growth strategy and focus on the 'future' as opposed to simply meeting the needs of the 'existing' population.

Bloor Homes highlighted the clear advantages to a comprehensive approach to strategic planning across the whole of the Greater Nottingham area, including Erewash. It was noted that the Borough forms part of the built Nottingham conurbation, but also has land immediately adjoining Derby City. A failure to implement a robust growth strategy in Erewash Borough will inevitably have significant detrimental socio-economic consequences for the wider Greater Nottingham area.

Marrons Planning on behalf of **Crofts Development Ltd, Davidsons Developments Ltd, Harris Land Management** and **Whitefields Farm** noted the strategic issues are intrinsically linked to scope of the plan and plan period and considered with the revised standard methodology and difficult decisions as about scale and pattern of development it may be prudent to plan for a longer period to at least 2040. It was noted that they were not aware of any exceptional circumstances to justify planning for any amount of housing lower than the standard method figure. It was considered that there were exceptional circumstances to justify the release of land from the Green Belt for the purposes of safeguarding as detailed in the NPPF. A buffer will be required land which will be supported by allocating safeguarded land. Noted that there is no need to identify "the most appropriate" strategy as this was a higher test from the NPPF 2012 and no longer forms part of the soundness tests.

Crown Estate suggested reference to an overall strategy for the pattern and scale of development should be amended to include reference to additional strategic sites which should be in the most sustainable locations to meet the needs of both urban and rural areas. Also noted that it is necessary to consider whether exceptional circumstances exist or not for Green Belt review and planning for infrastructure.

Boyer on behalf of **Gaintame Ltd, Harworth Group** and **Strawsons Group Investments Limited** considered the defined strategic issues to be appropriate.

Savills on behalf of **Gaintame Ltd** considered the time period for the new Plan of 2038 reasonable and noted it would be necessary for the Plan to consider implications of the Plan beyond that date, particularly in respect of

large scale developments including new settlements. It was considered the Plan should also have regard to identifying safeguarded land.

Geoffrey Prince Associates Limited on behalf of **Hammond Farms** commented that the list of strategic issues to be covered was comprehensive. However, in the light of the rapidly changing world in which we all live, emerging lifestyle changes and choices and their impact on strategic land use planning should also be added.

GraceMachin Planning and Property on behalf of **both OSVAID (Orston and Surrounding Villages Against Inappropriate Development)** and **Mr S and C Voce** were of the view that the broad strategic issues identified were considered to reflect the needs of the area.

Nottingham Credit Union noted the importance of the availability of affordable credit, particularly for the vulnerable.

Andrew Hiorns Town Planning Limited on behalf of **Parker Strategic Land Limited** considered the Plan should consider how development can address social and economic disadvantage as one of its primary objectives.

Pegasus Group highlighted that the sustainability of new development should be considered on a case-by-case basis, and not as a generic application of requirements. Reference was made to the White Paper and that "Growth" areas would be suitable for substantial development, which would need to be defined in policy. It was viewed that Top Wighay Farm Safeguarded Land (references G03.1 and G03.2) identified in the Consultation Document as an 'Urban Extension' and suitable for development would be in accordance with the Planning White Paper and should be identified for 'growth'.

Pegasus Group on behalf of **Hallam Land Management** noted that, whilst the time period for the new Plan of 2038 is a reasonable one, it will be necessary for the Plan to consider implications of the Plan beyond that date, particularly in respect of large scale developments including new settlements. It was noted that it is important that in planning for a highly sustainable pattern of growth, the strategy is not constrained by an end date of 2038. It was recommended that the Plan should also have regard to identifying safeguarded land, also requiring consideration of potential development post 2038.

Nineteen47 on behalf of **Richborough Estates** stressed the importance that a commitment is made to meeting all development needs in full within the Plan area. It was considered that the emerging options for the Plan should be sufficiently flexible to adapt to the anticipated changes, including both any increase in total housing requirements, and also the locational shift away from Nottingham City and towards the neighbouring Boroughs in terms of where those needs arise.

Persimmon Homes considered that spatial design implications posed by the current pandemic should be taken into account when considering strategic allocations.

Positive Homes Ltd noted as well as the NPPF, the Government is proposing major changes to the planning system, including local design codes. These codes will inherently require 'sustainability', which should be included with the new 'overarching policy'.

Savills on behalf of **Taylor Wimpey** considered that it was appropriate, and permissible under the current NPPF, for the Strategic Plan to amend the Green Belt boundaries based on evidence and assessment of alternatives.

William Davis noted in relation to 'climate change mitigation and adaptation' that the NPPF (para 20) only refers to "planning measures to address climate change mitigation and adaptation". Proposals which are not planning measures should, therefore, not be included.

Savills on behalf of **Wilson Bowden Developments** recognised the benefits of the new HS2 Hub but considered only the implementation of its station was noted. It was viewed that the document did not recognise the new permanent boundary created by the railway and its potential to create a new urban edge. The wider employment growth, in the Class B1(b and c) B2 / B8 (now class E) sectors of the market, represent a strategic issue for the conurbation and it was noted that the City has been short of high quality Class B1(b and c), B2 / B8 land for many years given the constraints of the Green Belt.

Bidwells on behalf of **Trinity College** considered that a Green Belt review should be undertaken and consideration to Green Belt release guided by the principles outlined in the NPPF.

Summarised comments from other organisations

Beeston and District Civic Society considered that decarbonising transport and other significant behavioural adjustments necessary to meet carbon neutral targets were strategic issues that should be given more prominence.

Carlton and Gedling U3A considered that further explanation as to what 'cultural infrastructure' means was required. Both cultural and leisure amenities need consideration.

Inspired Villages noted that reference should be made to the homes needed for older persons as recognised by national policy and the need for purpose built accommodation for older people to be delivered, particularly extra-care (C2 use class).

Nottingham Green Party highlighted the need for an increase in biodiversity of at least 10% for the whole of the Greater Nottingham Area.

Nottingham Local Access Forum stressed that it should be made clear that infrastructure for transport should include that for active travel.

Nottingham Ramblers noted the importance of improving the Active Travel network (walking/running, cycling, horse-riding). Rights of Way are considered a key part of the Highway system and have a very high cost-benefit ratio.

Summarised comments from local residents

One resident noted that each statement should be written for consultation in language that is clear and easy to understand by lay people. The Vision and Spatial Objectives refers to a 'quantum of new homes' which is unclear to a non-specialist.

As a general point, one resident proposed that negative impacts should be avoided at all costs, with priority being the encouragement of positive impacts.

Demands on land come from the building needs listed in the Strategy, but other demands were noted including those of our mental health and wellbeing, recreation, agriculture, reforestation, and biofuel materials. Reference was made to architects Vassal and Lacaton who prioritise the welfare of a building's inhabitants and desire for larger spaces.

Housing Numbers

A number of local residents and a Rushcliffe Councillor commented that the Greater Nottingham Strategic Plan appeared to indicate that there was sufficient housing supply already identified until 2038 and it was therefore unclear why a strategy was required for even more housing.

One resident questioned whether the strategy should accord with the housing figures set by Government, given that we live on a finite planet with finite resources which are being consumed at an unsustainable rate.

Another resident noted that the 'right number' of houses cannot be agreed, as developers will always build to maximise their profits.

Reference was made to the ageing population, lowering birth rates and changes in work ethics which should influence the planning of strategic development.

Type of Housing

In terms of the type of housing delivered, it was noted that new housing should be affordable and practical, for the elderly and less able and, importantly, near to amenities. Another resident noted the need to consider the role of the custom/self-build and several references were made to the need to accommodate an ageing population.

On respondent questioned what are the community needs, transport needs, employment needs, food and supply needs which make for more enjoyable living? It was suggested that new housing should meet Pasiv-Haus standards.

Infrastructure

A number of residents highlighted the importance of ensuring that relevant accessible infrastructure must be in place, including safe footpaths, cycle paths, roads, public transport, schools, medical services, local amenities, etc. With regards to community facilities, one resident suggested that hospitals, dental practices and social care need to be identified in addition to local GP facilities. In terms of the timing of infrastructure delivery, one resident suggested that developers should be required to have infrastructure (e.g. healthcare and education) in place before people take up residency on any site.

Wider implications including east-west travel in the Midlands, congestion, impact on utilities and broad band were noted by one respondent.

It was suggested that a waste review should be included as part of this process, for example the waste site at West Bridgford is already significantly over capacity and should be extended to support any new development.

In order to benefit from existing but underused infrastructure, it was suggested that priority should be given to sites to be redeveloped closer to the city of Nottingham that have already been consumed by industry/houses. For examples: Colwick industrial estate and the area between BP and Aldi on the way to Colwick from Nottingham.

Communication

It was considered that Plan preparation should include an ambitious and proactive plan to ensure high quality communication and consultation with current residents, to increase community support.

Flooding

References were made to the need to avoid areas that are increasingly susceptible to the impact of climate change, e.g. historic flood plain locations, or areas likely to suffer from surface flooding.

Ecology and Biodiversity

One resident suggested that enhancement of biodiversity should feature as a key strategic issue in its own right. Development should be supported by wildlife friendly building policies allowing for hedgehog corridors, swift boxes, hedgerows and trees, pedestrianisation and cycle routes. There should be a general presumption of not allowing development on or adjacent to existing designated Local Wildlife Sites, Local Nature Reserves etc.

Reference was made to the need to preserve green boundaries between areas. One resident suggested that green corridors and green spaces be included as part of the urban planning, for example the retention of a green corridor for both wildlife and human social recreation needs between Beeston Rylands and the Boots Nottingham City development site.

It was considered by one respondent that building new housing, schools and other infrastructure on green sites would run counter to urgent environmental and social priorities such as mental health and well-being.

A Rushcliffe Borough Councillor noted the importance of recreational space and in particular green recreational space and the positive impact on people's mental and physical wellbeing.

One respondent noted that potential residential infill development should be considered of inaccessible green space where enhancements could be made to the role and function of the space and substantial garden plots, e.g. Taylors Croft in Woodborough which is included in Gedling BC's SHLAA.

Coronavirus

Several references were made to the need for the Plan to take into account the post-covid world. It was considered that Covid-19 has accelerated the move from bricks and mortar to internet shopping and should be seen as an opportunity, including current projects such as the Broadmarsh redevelopment. The city centre as a shopping area is dead and should be turned over to living accommodation and green spaces in any brownfield and retail sites instead of extending out to the peripheries of the boroughs of Nottingham. One resident felt that the report should not have been rushed out at this time, given uncertainties around the impact of Covid-19.

It was suggested that priorities associated with the Coronavirus crisis should be considered as a separate issue. Greater emphasis should be given to both indoor and outdoor living space; as currently additional houses are crammed onto development sites. Providing additional outdoor space by reducing room sizes and gardens will not support mental health issues. Similarly, extending outside space at schools needs to be a priority.

One resident noted the pandemic has highlighted the **high-level of demand for accessible green spaces**. It has also demonstrated that those who do not have private transport are often unable to access the limited number of green spaces. Lack of such spaces has also resulted in damage to habitats and a rise in anti-social behaviour including fly-tipping.

Climate Change

One respondent noted the need for a strategy ensuring that the pathway to climate change mitigation, carbon neutrality, carbon sink restoration and net biodiversity gain was followed, with targets, measurements and milestones.

Given most of the councils included have declared a climate emergency, one resident suggested that the Plan should have a net zero carbon target of 2027 (which is the earliest commitment to be net zero made by Broxtowe Borough Council) or the Plan date of 2038 rather than the later 2050 date mandated by the Climate Change Act.

One resident noted that in terms of energy usage, an opportunity is provided to develop entire estates (even villages) centred around sustainability, with maximum renewables, heat networks etc.

With specific reference to paragraph 1.17, one resident noted that the final bullet point seeks to conflate several strategic issues into one sentence, which should be broken into separate issues, thus:

- Climate change mitigation and adaptation;
- Conservation, protection and enhancement of the natural, built and historic environment, including landscape and green infrastructure; and
- Reduction of transport pollution and industrial pollution.

Reference was also made over concerns with air and noise pollution and the importance of local food production.

Transport

One respondent noted that the River Trent has only three road bridges when accessing points north from south of the river and that these are already gridlocked.

Reference was made to the fact that all existing major employers and rail and air transport links are either north of the river or for (EMA & Freeport) requires traffic from the south to join the A52 in order to access the A453. It was considered that the tram network from south of the river near the A52 was limited.

One resident suggested that a greater emphasis should be given to cycling, in terms of accessing local shops and linkages with the rail network (to include bike parking at stations and the ability to take bikes on trains). Clearer separate cycle lanes should be provided. Several references were made to the need to focus on public transport.

One respondent noted that the Vision and Spatial Objectives should include a specific statement that new developments are supported by infrastructure which encourages active travel, and allows car-free movement between developments and existing neighbourhoods, town centres and key facilities. Supported by 'necessary infrastructure' was considered vague and not confirm the need to integrate into existing networks and neighbourhoods. Segregated cycle/scooter/active travel lanes should support all new developments, rather than retro fitting at a later date.

Another resident noted that a key transport constraint is the number and capacity of the river crossings. If there is to be significant expansion south of the river, new river crossings should be planned alongside the expansion.

A resident expressed the view that to assist in transport and leisure activities, or if the UK came under hostile attack, Tollerton Airport, the canal and rail networks should be brought back into use. One respondent questioned how Nottingham and the surrounding region can be part of a better national transport system such as E mobility and the Hydrogen economy? It was noted that Nottingham Tollerton (EGBN) and East Midlands need to be better integrated into the future transport network where rail is not viable and road is too slow.

Employment

One resident noted that employment is only mentioned in relation to "space for employment" but there is a need for strategy which stimulates, encourages and attracts employment.

One respondent noted the importance of the requirements of the main employers in Nottingham. It was considered that if a Development Corporation was created for the Toton Area Development, then Policies 14 & 15 of Aligned Core Strategies should be retained and apply equally to the area under the control of the Development Corporation.

It was considered that brownfield sites and retrofits should have priority over Green Belt development.

Reference was made to a number of the sites as identified in Chapter 2 and Appendix 2.

In Broxtowe

One resident flagged up a concern with regards to accessing the proposed development at B09.1. It was noted that the junction of Blake Road/Toton Lane was already heavily congested at certain times of the day, with vehicles being parked inconsiderately. Sisley Avenue was not wide enough for the amount of vehicles that it had to service. Due to the number of new dwellings, a bus service would need to be provided. Development would result in the loss of the last piece of farming land in Stapleford.

In Gedling

Concern was expressed that the creation of a bus lane from the Deer Park Drive area to the proposed park and ride would cause major disruptions to local people and wildlife. It would make the road dangerous for those who walk to the country park or to Arnbrook Primary.

The additional of another 3000-5000 houses in Calverton was considered to be disproportionate as the village is at saturation point, in particular in relation to drainage, traffic parking, doctors and schools. Concern was also

expressed regarding the impact on the Green Belt and wildlife as well as resultant vandalism, antisocial behaviour and crime.

In Rushcliffe

Concerns were expressed by one resident over climate change and impact of development in areas such as Lady Bay in terms of flooding and high water levels. Reference was made to the fact that the Plan should include community facilities and it was considered that if a school was chosen for the R07.1 site this would adversely affect the community by removing the primary school from Lady Bay.

It was noted that many cities are moving to a development model around ideals such as the '15 minutes city' which is seen to address many of the pressing challenges facing urban development, including environmental concerns, equality of access, public health, community and welfare. This essentially includes schools, which should never require car transport and the proposal to move Lady Bay Primary School out of the centre of the neighbourhood into a site away from people's front doors would strongly contradict this principle.

A number of residents voiced their concerns and objections to the proposed garden village at Orston/Elton On the Hill. Orston Village is a conservation area and any plans to develop a garden village would be contradictory to the planning laws for the area. The protection of the Green Belt had been ignored. Abundance of wildlife would be destroyed. It was considered that the A52 and Station Road were congested and unsafe. Associated increase in car and travel to city centre would increase CO₂ emissions and there would be a negative impact on Orston Plaster Pits (SSSI).

Ruddington was highlighted as a village that cannot cope with traffic, parking, schools and facilities already at capacity. Several residents expressed concern regarding the lack of infrastructure, including health, education and cultural infrastructure. Others noted that appropriate retail, leisure and other commercial development would be required to support additional housing development. It was suggested that there was no room in the village for additional schools or doctor's surgeries. 600 houses have already been approved, developing even more would destroy the identity of Ruddington. One resident expressed concern that the proposed 600 houses were not shown on the Plan and it was therefore not a true reflection of the position. It was viewed that the overall strategy for the pattern and scale of development was unacceptable and would be physically joined up with Clifton Estate to the West, Edwalton to the north and Bradmore to the south.

One resident noted an already distinct lack of cycle network and safe road crossings connecting Ruddington (via Flawforth Lane) to West Bridgford with cyclists having to cross a busy and dangerous roundabout on the A52. With the increase in cycling during Covid-19, safe cycle routes connecting children and adults to West Bridgford, Edwalton and the City would help with

counteracting the increase in congestion and climate issues associated with these extensive new developments proposed.

One suggestion was that a park and ride for the City should be provided outside Ruddington using the number 10 bus route to prevent long stay parking within the village which blocks access for genuine shoppers.

It was suggested that a new Rushcliffe High School should be provided to cater for the needs of Ruddington, Wilford and Edwalton children.

One resident noted that the three proposed sites in Ruddington and the site within the parish of Bradmore were all set in flood plains. Specific reference was made to land to the west of Pasture Lane in Ruddington, prone to flooding and an issue raised by both surveyors and insurers in relation to the surrounding roads (including Roe Gardens). Development should be reconsidered, particularly given the effects of climate change.

Additional development at Ruddington would result in the loss of Green Belt land.

One resident noted that it would be better to focus on a strategy that builds on brownfield sites with easier access routes already established (e.g. Langar) or with settlements like the A453/M1 development.

In relation to East Leake, several residents were of the view that the settlement has grown too fast for the provision of health facilities, schools, sewage, transport and road improvements and general facilities, including leisure (especially for young people) and shopping. Residents in this area want decent infrastructure and not end up being part of such huge communities as those planned between Clifton and Gotham, Stanford and Normanton on Soar and the A453 development as well as further building in East Leake. It was considered that the area was already disproportionately bombarded with new build applications.

Residents felt there was not enough infrastructure to support more homes in Cotgrave. Hollygate Park has neither shops nor schools and to build additional housing near to this site would mean more people travelling via busy roads into Cotgrave to use the already overcrowded and dangerous car parks for Sainsburys and Co-Op. Part of Cotgrave's character is its location next to beautiful and accessible green space. With specific reference to development at Woodgate Lane, the road would need to be widened (resulting in the loss of hedgerow habitat).

Consideration needs to be given on the wider geographical area to take account of knock on effects, such as at Stanford, Loughborough and Hathern.

Chapter Two: Overall Strategy

1. **Question OS1: Urban Intensification Growth Strategy**

Should we focus growth in and adjacent to the urban area as far as practical to meet development needs?

Summarised comments from statutory organisations

Amber Valley Borough Council recognises that the potential for further development within the northern part of Broxtowe Borough is most likely to impact on Amber Valley, given the common boundary between the two local authority areas.

Aslockton Parish Council suggest that travel to and from work, education, amenities and social activities will need to be sustainable utilising public transport and other modes of travel that do not rely on combustion engines. This will support the target of carbon neutrality before 2038.

Barton in Fabis Parish Council - support this growth strategy and the 'positive impacts' of urban intensification set out in figure 2.1. The negative impacts are speculative. Previous overreliance on Rushcliffe, Broxtowe and Gedling Boroughs delivering higher levels of housing than Nottingham City. All development sites within the City should be identified first. Concerned regarding the deliverability of SUEs.

Bingham Parish Council agree that, of the options available, urban intensification is the most realistic. The strategy should be about building a bigger Nottingham city.

Bradmore Parish Council comment that the emphasis should be on re-using previously developed land, maximising the use of existing infrastructure and urban regeneration. The Green Belt should be protected.

Burton Joyce Parish Council commented that we should focus growth in and adjacent to the urban area as far as practical to meet development needs, with exceptions for specific reasons in other areas. Caution should be exercised in any potential to extend growth to the Urban/Rural fringe, which is sensitive to urban sprawl and loss of identity. In principle, the Urban area of Nottingham already has large areas of derelict land suitable for residential, commercial and industrial development. It is recognised that certain former industrial locations are inappropriate for residential development due to contamination. Recent changes however, including the collapse of Intu, the long-term switch to online shopping and home-working and online business and administration, all accelerated and increased by the effects of the Covid19 Pandemic and unlikely to be reversed, have released land and existing buildings, that can be converted for residential use. A more flexible

approach should be taken to zoning. City living is desirable for many people: it reduces pressure on all forms of commuting, provides more business for remaining retail businesses within the urban area and gives those residents much easier access to all the services of the city.

Calverton Parish Council commented that if more developments were focussed closer to existing towns/urban areas there will be less need for additional infrastructure e.g. roads/retail outlets. The additional housing developments in these locations will be good for the economy as it will generate income boosting the economy and regenerating those areas that could have potentially been missed in previous years. 'Potential overload on existing service capacity' is identified, yet rural 'key settlements' have had pressure put on their already inadequate infrastructure/services provision as a result of disproportionately high levels of housing during this plan period.

Derbyshire County Council support this strategy from a transport perspective. This should also apply to the urban areas of settlements within Erewash Borough. This will ensure journey source and destination are minimised, and when combined with GBI infrastructure provision, should ensure that journeys are undertaken sustainably.

East Leake Parish Council feel that greater emphasis should be placed on development adjacent to the urban area, especially north of the River Trent. More dispersed developments create major challenges for use of public transport, which is more limited in rural settings. Most employment opportunities are based in the city centre and the North of Nottingham and bridges into the city would be unable to cope with the increased amount of traffic, which would result from growth South of the River Trent.

The **Environment Agency** do not comment on whether growth should be focussed in particular areas, but note that focussing development in urban areas is likely to increase development areas at risk of flooding contrary to NPPF. There needs to be a strong policy in place to preclude development in areas at high risk of flooding or functional floodplain unless it demonstrably reduces existing levels of flood risk. The future requirement to deliver biodiversity net gain as part of any new major development may not be feasible if the majority of development is restricted to urban areas.

Gotham Parish Council support this growth strategy and the 'positive impacts' of urban intensification set out in figure 2.1. The negative impacts are speculative. Previous overreliance on Rushcliffe, Broxtowe and Gedling Boroughs delivering higher levels of housing than Nottingham City. All development sites within the City should be identified first. Concerned regarding the deliverability of SUEs. which has led to successful appeals by developers to build houses on non-allocated sites.

Granby cum Sutton Parish Council support this strategy, as this will be important to help revitalize and sustain city centres in light of the impact of COVid-19.

Historic England notes that a strategy based on urban intensification would need to ensure heritage assets and setting are conserved or enhanced. Opportunities for heritage led regeneration could be identified within the Plan.

Holme Pierrepont and Gamston Parish Council commented that growth options should be focused on sustainable development in public transport corridors. These are poorly provided on the east side of the city. They should also adhere to green belt policy where possible. The M1 is the best defensible boundary in the area and should be used to avoid uncontrollable urban sprawl elsewhere.

Gotham Parish Council, Barton in Fabis Parish Council, Kingston on Soar Parish Council, Ratcliffe on Soar Parish Meeting, and Thrumpton Parish Meeting commented concern in respect of Sustainable Urban Extensions in that the deliverability risks they present for a variety of reasons, relating to their scale and infrastructure requirements, increasing the potential for delays. Further, they can lead to over-development, pollution, and service infrastructure over capacity. Ultimately, growth strategy OS1 is supported however, this Strategic Plan must not repeat the mistakes of the previous Aligned Core Strategy.

Linby Parish Council support the focus of development in city and town centres as part of sustainable regeneration. Reasons for this include: Existing areas make it easier to link well to transport infrastructure; Avoids more fragmented impacts on the natural and rural environments; Prevents urban sprawl by prioritising brown-field sites and making an effective use of land; and 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.

Natural England does not have a particular preference for either OS1 & OS2 but the chosen approach should result in no adverse impact on any designated nature conservation sites or protected landscapes. Any strategy option should also consider the evolving Nature Recovery Network and avoid Best & Most Versatile Land.

Nottinghamshire County Council commented that housing should be focused around the City Centre - to help areas meet their Carbon Neutral Target, Sustainable transport and revitalise town centres.

Nottinghamshire County Council (Education) prefer an urban intensification growth strategy. The Department for Education is encouraging delivery of large schools (two form entry and above) which is more achievable in urban areas where there are established populations and there is scope to expand existing education infrastructure to generate larger schools.

Papplewick Parish Council broadly agree with the process of urban intensification and consider that preferable to unfettered development or

urban extensions. The strategic plan should place greater emphasis on the re-use of brown land.

Radcliffe on Trent Parish Council commented that they support this option - hopefully office space will be available to convert to housing as a knock-on effect of Covid-19 as more employees work from home.

Ratcliffe on Soar Parish Meeting support this growth strategy and the 'positive impacts' of urban intensification set out in figure 2.1. The negative impacts are speculative. Previous overreliance on Rushcliffe, Broxtowe and Gedling Boroughs delivering higher levels of housing than Nottingham City. All development sites within the City should be identified first. Concerned regarding the deliverability of SUEs. which has led to successful appeals by developers to build houses on non-allocated sites.

Ravenshead Parish Council state that growth should be firmly focused in and adjacent to the urban area as far as practicable, in order to reduce dependence on use of motor vehicles to access employment and services. Brownfield sites should be prioritised.

Rempstone Parish Council supports the priority of growth in or adjacent to the urban areas of Nottingham rather than creating new developments in rural parts. Enables utilisation of existing infrastructure such as public transport.

Ruddington Parish Council commented that this is the most sustainable option. If there are ways to redevelop an area's image like with the outskirts of the Meadows, for instance, then there could be targeted focus. This can be a viable option if:

- incentives to use public transport (and an increase of services available) are created in order to avoid even more congestion on the roads within villages on the outskirts of Nottingham that lead to the centre and the main industrial estates;
- more green spaces are created to offset carbon emission and pollution generated by the increase of people/ cars/ factories/ house gases;
- it means that more degraded areas of Nottingham are taken into the picture.

Saxondale Parish Meeting comments that Covid is likely to result in more self-employment and demand for small office accommodation. There is an opportunity to convert large scale office requirement to retail or housing.

Severn Trent – Sewerage Management Planning note that whilst Severn Trent are generally supportive of this approach as it would locate growth within targeted areas, delivering greater certainty around where development will occur, additional benefits could be achieved through brownfield redevelopment.

Sport England commented that any growth options should be considered against health impacts and the creation of healthy and active communities. This plan provides a significant opportunity to allocate land for housing development in appropriate locations to create sustainable communities where active travel is enabled.

Stranford on Soar Parish Council has considered the four proposed strategies and would support both an urban intensification strategy and a transport led strategy.

Thrumpton Parish Meeting support this growth strategy and the 'positive impacts' of urban intensification set out in figure 2.1. The negative impacts are speculative. Previous overreliance on Rushcliffe, Broxtowe and Gedling Boroughs delivering higher levels of housing than Nottingham City. All development sites within the City should be identified first. Concerned regarding the deliverability of SUEs. which has led to successful appeals by developers to build houses on non-allocated sites.

Summarised comments from developers

Aldergate Properties commented that there will be opportunities to direct housing development within or adjacent to the main urban areas and this is generally supported. However due to the tightness of the green belt boundary around the urban area of Nottingham and Key Settlements it is inevitable that green belt release will be required to ensure sustainable patterns of development arise. This is already recognised in such as Gedling's adopted local plan, which provides safeguarded land.

Andrew Hiorns Planning on behalf of Bamber consider that growth needs to be located in and adjacent to the city given this is the most sustainable location to reduce carbon emissions with greater opportunities to walk and cycle to local facilities and work, and to meet existing social and economic needs and address deprivation. In addition, some proportionate growth should also be distributed to settlements on the basis that they too generate local needs and growth can support the sustainability of individual settlements. Also they consider there might be potential for strategic scale growth in a few new locations more distant from the urban area, where they have excellent transport connections and offer potential for significant economic growth, such as at Toton in relation to the proposed HS2 gateway, and potentially at Radcliffe on Soar Power Station (R15.2). They do not support a strategy of wider dispersal of growth.

Andrew Hiorns Town Planning Limited on behalf of Parker Strategic Land Limited considers growth needs to be located in and adjacent to the city. Some proportionate growth should also be distributed to settlements to support the sustainability of individual settlements. There may also be potential for strategic scale growth in a few new locations with excellent transport connections and the potential for economic growth, e.g. Toton HS2

gateway, and Radcliffe on Soar Power Station. The wider dispersal of growth is not supported.

Barratt David Wilson Homes comment given the overlap in timeline from the current strategy (2011 – 2028), perhaps ‘evolution’ rather than ‘revolution’ should be the focus which, in the first instance, points towards Urban Intensification and Main Towns + Rural Key Settlements beyond the Principal Urban Area (PUA) of Nottingham.

Barwood Land comment that it is considered that the most sustainable approach is to expand existing settlements where possible (i.e. dependent on available infrastructure and environmental considerations) such that development can then help support existing services and facilities. This general approach to reinforcing settlement hierarchies and plan making is well established in helping to create the most sustainable strategy for growth. The settlement of Arnold is classed as one of the main urban areas within Gedling Borough and is therefore seen as a suitable focus for new development, and higher order priority for locating new development growth. The issue with new settlements is that it takes a long time for their delivery, particularly given the amount of expected infrastructure to be provided, which then often slows down the rate of expected growth and can often then lead to problems and delay with the delivery of housing in the short term. It is therefore recommended that the growth strategy continues to focus on planned urban extensions, particularly on the edge of the largest settlement, Nottingham, and in this case, the urban area of Arnold, to ensure that the socio-economic benefits of development can be best realised for the area. Such an approach would assist the local authorities to realise their targets of becoming carbon neutral (Gedling by 2030) in accordance with OS5 Climate Change.

Bidwells on behalf of Trinity College prefer that growth should be focused in and adjacent to the urban area of Nottingham in order to meet future development needs. Figure 2.1 does not accurately capture the advantages and disadvantages of the two development scenarios put forward in OS1. The advantages and disadvantages of growth within, and adjacent to, a settlement are different.

Boyer on behalf of David Herrick, Strawsons, The Harworth Group, the Stagfield Group, Mr Stubbs and Mr Whittington commented that Urban intensification potential has largely already been realised and there is now limited capacity to supply further housing from this strategy. However, some large scale SUEs to the Nottingham urban area have not performed well in terms of ensuring a sufficient supply of housing and there is a need to introduce additional locations for growth that will help diversify and increase housing supply.

Carter Jonas on behalf of Burhill Group Limited note that a strategy focusing on development within the Nottingham main built up area would

promote urban regeneration through the use of brownfield sites, it must be recognised that this strategy will result in the under delivery of affordable housing owing to viability issues with developing brownfield sites. A more dispersed strategy is preferred which releases underperforming areas of Green Belt and allows the expansion of existing towns and villages in accordance with the NPPF. This approach will disperse the effects of development, allow a greater range of housing choice and speed up build out times.

Define on behalf of Bloor Homes suggest that the GNSP could and should incorporate elements of all four spatial strategy options to realise sustainable development in the Greater Nottingham area and ensure that the GNSP's vision and spatial objectives are actually achieved.

Fisher German on behalf of Samworth Estates commented that they concur that the eventual growth strategy should be a combination of the approaches including Urban Intensification Growth Strategy, a More-Dispersed Growth Strategy and Transport-Led Growth Strategy.

Fisher German on behalf of Taylor-Wimpey commented that they concur that the eventual growth strategy should be a combination of the approaches including OS1: Urban Intensification Growth Strategy and OS4: Transport-Led Growth Strategy. Given the issues relating to highway capacity and lack of road crossings of the River Trent, it is vital new development is located adjacent to sustainable areas where there are services, facilities and employment within close reach, or where development can take advantage of new and planned transport infrastructure to access larger centres and the main urban areas. The Council should look favourably on schemes with good access to existing infrastructure, particularly the Nottingham Express Transit (NET) network and heavy rail networks.

Fisher German LLP on behalf of The Trustees of the Locko 1991 Settlement concur that the eventual growth strategy should be a combination of the four approaches. Urban intensification should not however be limited to the main Nottingham Urban Area. Whilst Erewash Borough contains settlements that form part of the Nottingham Primary Urban Area, no part of Erewash directly borders with Nottingham City. Erewash does however contain land immediately adjoining Derby City, and is actually located within Derbyshire, therefore falling under the remit of Derbyshire County Council. Erewash has a clear relationship with Derby City however the relationship between Nottingham and Derby is not discussed at all within the consultation document, and thus such relationships are at risk of being downplayed.

Geoffrey Prince Associates Ltd on behalf of Hammond Farms considers that a balanced strategy is required which makes provision for growth within and adjoining the main urban area, the key settlements and at other villages, including also along transport corridors/around transport hubs.

Geoffrey Prince Associates Ltd on behalf of Langridge Homes Ltd

considers that a balanced strategy is required which makes provision for growth within and adjoining the main urban area, the key settlements and at other villages, including also along transport corridors/around transport hubs. Significant provision will also need to be made for growth around key settlements which have a good range of services and which have potential to grow. In addition, other villages should also be expected to accept additional development over and above just meeting local housing needs

Gladman: Employing this strategy alone would fail to deliver a sustainable spatial strategy or meet the housing need of the wider strategic area aligned with employment growth hubs across the districts. Indeed, it would be more appropriate to include this growth option in combination with a more dispersed growth strategy to ensure a wide range of sites are available to address the needs of the Greater Nottingham area. The application of higher densities may not be appropriate in all locations. The Plan should provide minimum density requirements as a range dependant on location and to enable proposals to respond to site circumstances including local character and constraints.

GraceMachin Planning & Property on behalf of DSL Holdings Ltd wholly support the urban intensification growth strategy, which seeks to focus development within and adjoining the Nottingham Main Built Up Area. The positive impacts of this approach are significant and offer the best opportunity to deliver sustainable development. Any potential negative impacts of this approach can be carefully and appropriately managed through appropriate Site selection and the application of development management policies.

GraceMachin Planning & Property on behalf of Mr S and C Voce broadly support the urban intensification growth strategy, which seeks to focus development within and adjoining the Nottingham Main Built Up Area. The Growth Options Study identifies a number of potential development sites adjoin the main built up area of Nottingham or the more sustainable settlement which perform better than sites in more dispersed locations.

GraeceMachin Planning & Property wholly support the urban intensification growth strategy, which seeks to focus development within and adjoining the Nottingham Main Built Up Area and support the allocation of land immediately to the north of a recent residential allocation in the Broxtowe Local Plan - Policy 3.4 Stapleford (west of Coventry Lane). The site (located within the Broxtowe South area) is not identified as having been considered by the growth options study.

GraceMachin Planning & Property on behalf of OSVAID (Orston & Surrounding Villages Against Inappropriate Development) wholly support the urban intensification growth strategy, which seeks to focus development within and adjoining the Nottingham Main Built Up Area. They consider positive impacts of this approach are significant and offer the best opportunity to deliver sustainable development through urban regeneration,

and the protection of the Green Belt. (AECOM), Updated in July 2020, identifies a significant number of potential development sites which lie within or immediately adjoining the main built up area of Nottingham or the larger, more sustainable settlements within Greater Nottinghamshire – these Sites have more than adequate capacity to provide the quantum of housing required to serve the housing needs of the area during the plan period, in locations which perform better against almost all criteria, when compared to sites identified in more dispersed locations.

Homes England are supportive of the vision and spatial objectives set out, particularly in respect to the quantum of new housing proposed during the plan period. As a site adjacent to the main urban area, the development of Fairham can support the Urban Intensification Growth Option referred to in Section 2 of the consultation document and Question OS1.

Homes England and the DIO welcome the recognition that additional dwellings can be allocated at Chetwynd Barracks and form part of the housing supply for Broxtowe Borough over the forthcoming plan period. The Barracks, in its entirety, is capable of contributing to the supply of new homes in Broxtowe. Homes England/DIO seek its allocation in the Strategic Plan and confirm that it will deliver further development beyond the 500 dwellings allocated in BBC's LP Pt2. As a previously-developed site in the main urban area, the redevelopment of Chetwynd Barracks is capable of supporting the Urban Intensification Growth Option referred to in Section 2 and Question OS1. The site provides an opportunity for transport network improvements and its proximity to the planned HS2 station and associated strategic growth site at Toton, means that it is also capable of contributing to the Transport-Led Growth Option referred to in Question OS4.

HSL support urban intensification, however, it is important that if this approach includes the identification of sites around the built-up area of Nottingham within the Green Belt this should not be in favour of the choice of sustainable alternatives outside the Green Belt, such as Aslockton

JW Planning Ltd on behalf of Hall Construction Services Ltd consider that a more dispersed Growth Strategy Option is preferable for the Greater Nottingham Strategic Plan Area.

Marrons Planning on behalf of Crofts Developments, Davidson Development, Harris Land, Mather Jamie Ltd and Whitefields Farm commented that this growth strategy option would focus development within and adjoining the Nottingham main built up area with any residual development, which cannot be accommodated within the existing urban area to be allocated in Sustainable Urban Extensions on the edge of the Nottingham urban area. On the basis that they consider that exceptional circumstances are likely to exist that justify the release of land from the Green Belt they consider that elements of this option would work well as a hybrid that sought to balance the spread and location of growth to serve

multiple markets including the rural areas surrounding the urban edge of Nottingham.

Nexus Planning on behalf of CEG Land Promotions 1 (UK) Ltd support a growth strategy which firstly looks to focus development within existing urban areas on previously developed land and increased building densities.

nineteen47 on behalf of

- **Richborough Estates (Land off Oxton Road, Calverton)**
- **Richborough Estates (Burnside Grove, Tollerton)**

disagrees with this strategy as it does not reflect the evidence of need proposed within the new standard methodology. Over reliance on previously-developed land will lead to significant risk of housing requirements not being met, due to inherent risks. A mix of sites in a variety of locations is required to ensure that housing needs can be met within the plan period.

Oxalis Planning on behalf of Bloor Homes (Midlands) consider that the growth strategy for Greater Nottingham should consider both the locational attributes of particular locations together with the specific benefits of development proposals. The Aecom Study only considers high level locational matters. Urban intensification can achieve many of the sustainable development objectives, but this should not be at the expense of the quality of the urban environment or result in the loss of urban green spaces. New sites outside the urban area will be required and sites which deliver the most sustainable development should be progressed.

Oxalis Planning on behalf of W Westerman Ltd consider that too great a focus on a particular strategy can result in unsustainable development and the strategy should focus on the delivery of a range of sites and locations. Sites which deliver the most sustainable development should be progressed. That could be new settlements, urban extensions, or smaller scale development in villages or a combination of all and is likely to mean the development of land currently identified as Green Belt.

Oxalis Planning on behalf of unnamed landowners and developers considers that each of the four growth options should be utilised to achieve sustainable development. Urban intensification should not be at the expense of the quality of the urban environment or result in the loss of urban green spaces. New development sites outside the existing urban area will be required to meet needs.

Oxalis Planning on behalf of John A Wells Ltd suggest that the growth strategy should utilise different development types of locations which can in combination secure the delivery of enough homes to meet and exceed the housing needs. The previous approach has resulted in a consistent undersupply of homes. The strategy will need to allocate sites outside the existing urban area, to include new settlements, urban extensions, or smaller scale development in villages or, most likely, a combination of all and include land in the Green Belt.

Oxalis Planning on behalf of Richard Taylor propose a mixed strategy which promotes accessible development and retain green space. There should be a focus on growth where there are existing or planned transport improvements.

Oxalis Planning on behalf of South West Nottingham Consortium consider that the Growth Options Consultation document is misleading and inappropriate by identifying 4 'growth options'. They consider a strategy for the sustainable growth of Greater Nottingham will necessarily include a range of development locations and different development forms and overall, the strategy should be in a form that is able to ensure delivery of the homes and new jobs the area needs, and achieves this in the most sustainable way possible. The approach set out in Para 2.10 of the Growth Options document is strongly supported. Finally, they consider connectivity and accessibility of sites to employment opportunities and services and facilities is essential in order for the deliverability of sustainable development.

Oxalis Planning and Boyer Planning on behalf of W Westerman Limited and Strawsons support development adjacent to the main built up area of Nottingham. Broxtowe will need to rely on greenfield sites either in the form of urban extensions, new settlements or village extensions or a combination of the three. Sustainable urban extensions access a wide range of existing services and facilities within the urban area they are attached to and can deliver community benefits on site with low landscape impact.

Pegasus Group they support a Strategy that focuses growth within and adjacent to urban areas with the preferred spatial strategy not focus on urban intensification alone. They also consider allocating sites for development should be given to those available and developable sites which are identified as 'urban extensions' and are not in the Green Belt in the first instance.

Pegasus Group on behalf of Hallam Land Management notes that a strategy that focuses growth within urban areas to meet development needs is supported in principle. However, the preferred spatial strategy should not therefore focus on urban intensification alone.

Pegasus Group on behalf of Nottinghamshire County Council and Hallam Land Management support a Strategy that focuses growth within and adjacent to urban areas but the preferred spatial strategy should not focus on urban intensification alone. Consideration of allocating sites for development should be given to those available and developable sites which are identified as 'urban extensions' and are not in the Green Belt in the first instance. Top Wighay Farm Safeguarded Land (references G03.1 and G03.2) is identified by the Consultation Document as 'Urban Extension'.

Persimmon Homes commented that urban intensification growth strategies may in part be applicable though its effectiveness is contingent upon the availability of suitable brownfield & employment city change of use sites.

Urban intensification strategies typically direct development toward playing fields or alternatively brownfield sites which may have subsequently become biodiverse rich habitat. Such sites within cities are rare and therefore highly valued by residents living in often dense, built up conurbations. Urban intensification can therefore lead to urban cramming which comes at a cost to the environment and detriment to city resident's sense of wellbeing. Nottingham City has a demonstrable lack of family housing, a proliferation of HMO and apartment led developments. Urban intensification strategies may further exacerbate a reduction in the variety and house types available on the open market. A Green Intensification approach for cities would introduce greener, healthier and cleaner living standards for city and suburban residents. Offsetting is intended to address, abate and reinstate lost habitats which are most needed within urbanised areas. An urban intensification growth strategy may therefore come into conflict with emerging environmental law aimed at protecting valued habitats.

Savills on behalf of Taylor Wimpey (Land East of Gamston) considers that that, in the main, Nottingham City and edge of City land presents one of the most sustainable options for new development but this is not an absolute as there is likely to be land within the wider authority areas that can deliver development capable of being defined as sustainable.

Savills on behalf of

- **Gaintame Ltd**
- **Wilson Bowden Developments (Land at New Farm, Nuthall)**
- **Wilson Bowden Developments (Land West of Woodhouse Way)**

recognise that the introduction of HS2 to the west of Nottingham will create a new defensible boundary and significantly change the character of the existing Green Belt.

Savills on behalf of

- **Taylor Wimpey (Land West of Ruddington)**
- **Taylor Wimpey (Land North West of East Bridgford)**

consider that that in the main Nottingham City and edge of City land presents one of the most sustainable options for new development but this is not an absolute as there is likely to be land within the wider authority areas that can deliver development capable of being defined as sustainable.

Savills on behalf of Rushcliffe Borough Council commented that the direction of growth adjacent to the urban area is supported and RBC consider that its focus should be on the delivery of housing which adjoins the Nottingham Main Built Up Area. Additionally, they agree with the positive impacts listed in Figure 2.1 and consider that development adjacent to the existing urban edge will ensure that development is delivered in a location that is easily accessible and within close proximity to existing facilities and services. The Growth Options Consultation Document lists the typology option of sites located within the West of Tollerton "Broad Area of Search" as

“Urban extension / village expansion”. RBC consider that a mix of typologies is required and that development adjacent to the urban area does not have to be in the form of a Strategic Urban Extension (SUE). RBC consider that small / medium sites provide suitable alternatives due to a reduced impact on existing service capacity. Additionally, small / medium sites provide the opportunity to deliver housing quickly, albeit at a lower level than SUEs as they are not delayed in the same way by the delivery of large-scale infrastructure that SUEs require.

Stantec (formerly Peter Brett Associates) on behalf of Barwood Land generally support the principle of an ‘Urban Intensification Growth Strategy’ but are this option alone would not meet the area’s development needs in full. An approach is favoured which incorporates a combination of the various Growth Strategy Options, with a particular emphasis on the ‘More-Dispersed Growth Strategy Option’.

Stantec (formerly Peter Brett Associates) on behalf of Barwood Land note that the LHN results in a 450 dpa increase in the proposed requirement for Rushcliffe Borough i.e. a 75 per cent increase. Hollygate Lane, Cotgrave is located in Rushcliffe Borough, where the bulk of Greater Nottingham’s housing need arises and can help to meet needs. The Growth Options Study finds that Broad Area of Search R08 should be considered as a “potential area for strategic growth”, based on our assessment above, they are of the firm view that our client’s site should be considered as having ‘high’ potential for growth.

Star Planning on behalf of Mr Jonathan Greenberg states that the Government remains committed to boosting the delivery of housing and this should be at the heart of the emerging plan. There should be a range of sites at a multitude of suitable settlements to ensure expedient delivery of the much needed new homes rather than a strategy which relies upon the delivery of either 1 or 2 large urban extensions on the edge of the Nottingham urban area or even a new settlement.

Turley on behalf of IM Land commented that focusing growth in and adjacent to the urban area was an approach taken by the adopted aligned Greater Nottingham Core Strategies. In Rushcliffe this approach has significantly comprised the deliverability of its Core Strategy. At the Local Plan Part 2 examination it was found that the strategic sites adjacent to the urban area were not being delivered. This had significant implications for Rushcliffe, a number of unplanned sites were successful at appeal as the authority was not able to demonstrate a five-year housing land supply. In any case those allocated strategic sites will continue to deliver during the emerging GNSP’s plan period and therefore should be part of the strategy. However, the overall strategy for the emerging plan should seek to reduce its reliance on the delivery of large scale sites and instead focus on more dispersed growth at existing settlements. Strategic growth at these existing settlements can unlock much needed new infrastructure, such as the proposed new school site which forms part of IM Land’s proposals for land to

the west of Cotgrave. The GNSP should seek to identify a growth strategy which is more of a blend of each of the options set out.

Uniper UK Limited refers to locations outside of the urban area which can make a significant contribution to meeting development needs in a sustainable manner. Strategic sites, such as the Ratcliffe Power Station site, benefit from excellent connectivity to existing infrastructure and provide the opportunity to redevelop and regenerate previously developed land and reduce the burden on the urban area and adjoining land.

William Davis do not object to the intensification of the existing urban area, but queries whether this strategy will meet the housing requirements.

Wood PLC on behalf of Crown Estate commented that this approach is too simplistic. This option should be recast and combined with strategies that effectively meet the growth needs and aspirations of both urban and rural areas. This should be supported by a realistic housing trajectory, informed by evidence to clarify the scale of new allocations required to 2038 and the Government's proposed changes to the Standard method. It is noted that such changes could indicate lower housing need in Nottingham and a significant increase for Rushcliffe. Where locations are in the Green Belt, they will be subject to NPPF137 which requires the plan authors to demonstrate they have considered all other reasonable options and explain how this has been factored into the decision-making process. This could for example involve a strategy that directs growth to parts of Rushcliffe outside the Green Belt.

WSP UK Ltd working on behalf of Global Mutual / The Victoria Centre Partnership supports sustainable growth that is focused in and adjacent to the urban area as far as practical to meet development needs. If considering growth in other areas, for example with new Sustainable Urban Extensions, careful consideration needs to be given to ensuring new services are complementary to the role of the existing hierarchy and network of centres, including Nottingham City Centre, town, district and other local centres. Such development should also incorporate measures to positively contribute to NCC's regional role, for example with connecting public transport infrastructure.

Summarised comments from other organisations

Burton Joyce Climate Action group support this strategy if it is land that has already been developed and has good public transport. Green spaces are important to have adjacent to urban areas. What about the Broadmarsh development?

Carlton and Gedling U3A suggest that the vision should be to reuse derelict sites and brownfield sites. Local Authorities should use their powers to reduce the volume of vacant dwellings, shops and offices; require developers to build housing for which planning permissions have already

been granted and obtaining planning gains for local communities and the environment from developers as part of planning process.

Home Builders Federation (HBF) suggest that the GNSP should ensure the availability of a sufficient supply of deliverable and developable land to deliver Greater Nottingham's housing requirement. There are disadvantages to pursuing any proposed Growth Strategy Option in isolation. The Urban Intensification Growth Strategy Option is unlikely to meet all development needs due to the restricted capacity of the urban area and insufficient availability of brownfield sites. Higher densities are only appropriate in certain locations. The setting of residential density standards should be undertaken in accordance with the 2019 NPPF (para 123). The preferred Growth Strategy of the GNSP is most likely to be a combination of two or more proposed Growth Strategy Options therefore urban intensification should be considered as part of a combination of proposed Growth Strategy Options.

Keyworth Conservation Area Advisory Group notes that building on brownfield sites protects the green belt and promotes regeneration. Covid 19 will result in major changes to our cities and town centres and replace business and retail with residential properties.

Nottingham Campaign to Protect Rural England support urban intensification but small-scale housing developments are likely to be needed in smaller settlements to meet the need for affordable housing and create well-balanced rural communities. It is likely that brownfield sites will become available in the urban area, which can then be used for housing and local amenity. An urban intensification strategy needs to be combined with the Green and Blue Infrastructure-led Growth Strategy Option and the right kind of transport-led strategy. Plan to avoid potential negative consequences of urban concentration such as an increase in air pollution or the loss of urban green spaces.

Nottingham Green Party states that future development should be contained within the areas that are currently developed or have been developed in the past. Anything less would run contrary to the aims of GNSP to get CO2 levels down to zero and bio diversity up by 10%.

Nottingham Open Space Forum comment that over concentration presents significant risk to existing urban green and open space. Should be no blanket presumption either way but schemes based on their own local infrastructure to avoid excessive commuting etc.

Nottingham Local Access Forum agrees that this option is most likely to encourage active travel and be more sustainable. However, this should not be at the cost of over-development or losing open spaces in the urban area.

Nottinghamshire Ramblers commented that development concentrated in and around urban areas is a good option as it encourages active travel and is better for the environment. There will be a need for regeneration post-

COVID – for example, Nottingham City Centre will have a number of vacant retail and office units that could be developed for multiple uses. However, the pandemic has highlighted the benefits of access to green spaces, and it is vital that people who live and work in high-density urban areas are within easy reach of open spaces and green corridors with all the positive effects on physical and mental health. This will also promote interest in active travel with the attendant benefits such as reduced obesity, as it is a much nicer experience walking or cycling through some green space rather than just large built-up areas. Responses to the consultation around ideas for the Broadmarsh site demonstrates how much the local population would value green spaces as part of the overall development.

Nottinghamshire Wildlife Trust consider that applying an urban intensification approach could mean that parts of the city would lose, in many cases, popular, highly valued and high quality (in terms of value to people and wildlife) open spaces and wildlife sites.

OSVAID (Orson & Surrounding Villages Against Inappropriate Development) wholly support the urban intensification growth strategy. The positive impacts of this approach are significant and offer the best opportunity to deliver sustainable development through urban regeneration, and the protection of the Green Belt. The AECOM report identifies a significant number of potential development sites within or adjoining the main built up area or the more sustainable settlements which have more than adequate capacity to meet housing needs.

Planning & Design Group (UK) Limited on behalf of The University of Nottingham notes that a strategy of urban expansion with large scale SUEs has proven to be undeliverable. With the notable exception of Clifton, other large urban extensions have been difficult to bring forward and there is limited availability of deliverable brownfield land. The B09 is categorised as an Urban Extension and growth here is supported. An appropriate balance of urban expansion and a more dispersed growth strategy option is needed.

Pedals (Nottingham Cycling Campaign) states that objectives should include ensuring that sustainable transport links new and existing development and that provision for active travel (cycling and walking) is facilitated and promoted, for both utility (commuting, educational and shopping trips) and leisure use.

RBC Leake Ward members support this strategy. Within the existing urban area is the best option as it is the most environmentally friendly. But it needs bold and imaginative strategic planning to repurpose existing buildings and improve areas that need regeneration. Sustainable Urban Extensions (SUEs) are the next best option after development within the existing urban area.

Rushcliffe Councillor commented Yes: focus growth in and adjacent to urban areas. The only way to live sustainably is to live close together as it reduces environmental costs of delivery and transport and allows sharing of

carbon costs (e.g. in public transport). Productivity tends to increase in larger in cities.

Rushcliffe Green Party states that Sustainable Urban Extensions are a bad idea, encouraging urban sprawl; they are not sustainable in any sense.

Sharphill Action Group (SAG) favours the Urban Intensification (Growth) Strategy as this is the most sustainable option, making the most of existing infrastructure, keeping the city centre ticking over economically, and reacting to probable reduced levels of development land need. The Green Belt should be kept as intact as possible to maximise the take-up of urban 'brownfield' and windfall sites.

South West Consortium consider that a strategy for the sustainable growth of Greater Nottingham will necessarily include a range of development locations and different development forms. What is important is that, overall, the strategy is in a form that is able to ensure delivery of the homes and new jobs the area needs, and achieves this in the most sustainable way possible. This approach set out in Para 2.10 of the Growth Options document is strongly supported. Clearly connectivity and accessibility of sites to employment opportunities and services and facilities is essential in order for the deliverability of sustainable development.

Tollerton Against Backdoor Urbanisation (TABU) state that growth should be focused in urban areas but not adjacent to the urban area since this creates urban sprawl.

Uniper UK Limited stated that there are locations outside of the urban area which can make a significant contribution to meeting development needs in a sustainable manner. Strategic sites, such as the Ratcliffe Power Station site, benefit from excellent connectivity to existing infrastructure and provide the opportunity to redevelop and regenerate previously developed land and reduce the burden on the urban area and adjoining land.

The University of Nottingham stated that in Derbyshire, Leicestershire and previously in Nottinghamshire, a strategy of urban expansion with large scale SUEs has proven to be undeliverable. With the notable exception of Clifton, other large urban extensions have been difficult to bring forward. Other challenges to this strategy option include the reliance on redeveloping brownfield land whereas in reality, there is limited availability of deliverable brownfield land. The University of Nottingham notes that the B09 is categorised as an Urban Extension. Directing growth to this part of Greater Nottingham is supported by the University of Nottingham. Refinement of the approach set out by OS1 is necessary to ensure an appropriate balance of urban expansion and a more dispersed growth strategy option is achieved.

Willow Farm Action Group consider that continuing to direct housing growth towards the urban edge cannot be a sustainable option, in all senses of that word, and this strategy should be refined to separate the positive

aspects of urban regeneration from the over reliance on further development of the urban edge and key settlements.

Summarised comments from local residents

The vast majority of comments from local residents support this growth option and a variety of advantages are identified, building on those outlined in the Growth Options document: -

- Sustainability reasons and to minimise carbon emissions;
- Opportunities for regeneration (as at the Meadows);
- Opportunity to create more green spaces;
- Opportunities to utilise existing and emerging public transport provision;
- Allow for more effective use of renewable energy approaches such as communal heating schemes;
- Provides new housing with access to existing employment opportunities and amenities;
- Would enable the prioritisation of Nottingham's many brownfield sites and protect greenfield sites;
- The redevelopment of brownfield sites is more likely to involve small and medium sites which are more attractive to SME builders and in line with Government policy;
- Provides an opportunity to reuse vacant buildings and land;
- To respond to the freeing up of the increased amount of redundant office and retail space arising from Coronavirus, which could be converted to residential accommodation;
- To help keep the centre vibrant, including boosting the ailing retail and service sectors;
- To provide growth in areas that generate growth, i.e. cities

Some local residents supported this growth strategy subject to caveats. Reference was made to the need to prioritise quality of life so that this strategy did not result in overcrowding and overloading. Specific reference was made to balance the strategy with green spaces, such as the city centre park suggestion for the Broadmarsh site. Concern was expressed that 'creeping suburbia' should be avoided and also the consumption of nearby fields that provide a healthy environment. Others noted that this strategy provided the potential to increase the density of housing stock, but it should be ensured that all households have ready access to green space. Reference was made to the improving brownfield sites to include a mix of innovative housing (e.g. with green roofs, rainwater harvesting, solar panels) to deliver a net environmental gain. The need for fiberoptic broadband was highlighted due to the move to working from home, post Covid.

Some local residents supported this option as an alternative to other options, such as: -

- To avoid/minimise development in green belt locations;
- To avoid building on agricultural land;

- When considering smaller rural communities supporting infrastructure is unlikely to exist and extra housing will just increase pressure on existing infrastructure.

Many of those who support this growth option distinguish between growth in the urban area and growth adjacent to existing urban areas. It was suggested that question should be separated into two to reflect the different issues raised: developing brownfield sites within the current urban area and developing adjacent to the urban area.

In terms of process, one respondent suggested that the strategy should have been asked before the Plan was issued. The Plan appears to be a collection of proposals that landowners and builder have come up with, not a coherent strategic plan to best meet the needs of the community.

Some local residents disagree with this strategy and a number of reasons were given.

- you continue to make long term problems by concentrating on urban developments;
- urban intensification is not done well, with little regard to resident objections and virtually no regard to what the local residents want;
- due to the need to keep urban green spaces, which are vital for recreation, well-being and wildlife, it is better to develop elsewhere;
- urban sprawl should be avoided and instead new villages should be created with access to the countryside;
- existing communities should not be developed further. In my village, Calverton, we have already agreed to more growth via the Local Plan.
- Does not protect the green belt, which is given as a positive for this proposal, as it results in urban creep.

One resident commented that some of the negative comments listed for urban intensification are not exclusive to this particular growth strategy but would apply to the same degree, or to a greater degree, to growth concentrated in rural areas.

Some local residents only partially supported this strategy, for the following reasons: -

- Villages should also have homes and work facilities locally to minimise commuting;
- There is a need to regenerate our rural communities and provide more and varied mix of housing. The retention of young people in our villages is essential to regenerate businesses and community buildings.
- The strategy is supported but also potentially new settlements.
- Agree with development within the urban area but any further development should not extend the existing urban areas but be in a fully planned and serviced new Garden Village near the A453/M1.
- Agree with development within the urban area but not with further Sustainable Urban Extensions.

- The strategy is supported and the least worst remaining option would be dispersed growth by adding development pro-rata to existing settlements.

Some of those who supported this strategy suggested specific areas that would be appropriate for development: -

- Some locations within the City and the built up area of the Conurbation identified for development by the former Nottingham Development Enterprise.
- Focus on land to the west of the City which has better connections to London and the Midlands from HS2.
- Develop alongside existing services as follows. Gedling focus around Hucknall, Arnold, Netherfield; Rushcliffe focus on Clifton, Gamston, Edwalton, Ruddington and branch towards Gotham, Cotgrave and Radcliffe; whilst Broxtowe builds the gap between Ilkeston and Strelley as well as the HS2 area. Nottingham needs to build upwards, limited space. Focus on business and office. All the M1 Junctions should have Industrial and Warehouse estates as seen near EMA; create jobs.
- Acknowledgment of new employment opportunities e.g. Ratcliffe Power Station, East Midlands Hub.
- Explore brownfield sites to the west of West Bridgford where there are good transport links.
- Focused growth outside of the urban areas could be acceptable, for example when Ratcliffe Power Station closes in 2025.
- The development of SUEs to the West of Nottingham in the Broxtowe areas near the M1 (B03, B04, B05, and B08) makes sense and maximises transport links.

Some of those who supported this strategy referred to specific areas that they would not wish to see come forward for development: -

- The proposal for a garden village between Elton on the Hill and Orston is counter to the strategy and all the positive impacts. It does not extend urban development; it does not support brownfield development; it is not a sustainable development; it does not support green and blue infrastructure led growth; and it does not support the transport led growth strategy.
- Objects to the proposed development of Bank Hill, Woodborough Village.
- The development of Bingham RO3.2 and RO3.3 means that Aslockton will become part of the urban sprawl of Bingham.
- Objects to south of Orston site for the following reasons: Orston Village is a conservation area; contrary to RBC Local Plan; impact on wildlife, traffic impact and congestion; increase CO2 emissions, impact on Orston Plaster Pitts SSSI; and visual impact on the landscape setting.
- The option of developing the land all the way from Fairham Pastures, alongside Thrumpton to West Leake would be urban sprawl.

- The development of SUEs to the North of the urban area would encroach into the Green Belt which is otherwise unspoilt beyond this boundary.

2. **Question OS2: More-Dispersed Growth Strategy Option**

Should we opt for more dispersed growth, expanding existing settlements or developing new settlements within or beyond the Green Belt?

Summarised comments from statutory organisations

Amber Valley Borough Council: considers that ‘the potential for further development within the northern part of Broxtowe Borough is most likely to impact on Amber Valley’. ‘Any significant growth in this location could have economic benefits to Amber Valley residents.’

Aslockton Parish Council: ‘Limited sympathetic development’ in the Green Belt should be considered ‘that does not allow the coalescence of settlements’ but provides employment, education and other facilities.

Barton in Fabis Parish Council, Gotham Parish Council, Kingston on Soar Parish Council, Ratcliffe on Soar Parish Meeting and Thrumpton Parish Meeting: No, due to the negative impacts identified in Figure 2.2 in the consultation document, particularly the impact on the Green Belt, commuting, pollution and long development timescales. However, ‘there may be a case for limited expansion of individual settlements’.

Bingham Parish Council: No, due to the impact on low income households of having to travel to reach support services.

Bradmore Parish Council: No. ‘The Green Belt should be protected. The dispersed growth strategy amounts to nothing more than Nottingham urban sprawl and a more viable option is that of development within Nottingham itself.’

Burton Joyce Parish Council: No. Growth in outlying or rural settlements ‘needs to be balanced with the benefits of development in the urban area’. The strategy would be damaging to the local community, result in the loss of valuable green space and may harm local health and education provision.

Calverton Parish Council: It would depend on the exact locations considered for development, the infrastructural provision within those settlements and the connectivity with infrastructure elsewhere.

Chetwynd: The Toton and Chilwell Neighbourhood Forum: considers that there needs to be a mixed approach involving both ‘urban’ and ‘dispersed’ growth.

East Leake Parish Council: The Council considers that land beyond the Green Belt should be given the same weight as Green Belt land.

Historic England: This strategy ‘would need to ensure heritage assets and setting are conserved or enhanced’. Opportunities for heritage-led regeneration could be identified. ‘Green Belt developments could potentially harm heritage assets.’

Holme Pierrepont and Gamston Parish Council: No. The Council also considers that ‘the M1 is the best defensible boundary in the area and should be used to avoid uncontrollable urban sprawl elsewhere’.

Linby Parish Council: No; dispersed development would ‘have a greater impact on the rural areas’, ‘create greater competition with existing areas’ and ‘create more car journeys’.

Natural England: ‘does not have a particular preference’ of strategy. However, the chosen approach should: avoid adverse impact on designated nature conservation sites or protected landscapes; consider ‘the evolving Nature Recovery Network’ and therefore avoid allocating for development ‘key areas of potential habitat expansion and connection’; and avoid Best and Most Versatile (BMV) agricultural land.

Nottinghamshire County Council: No. Growth should be ‘concentrated around the City Centre’. ‘Brownfield should be the priority, and where people can use public transport.’

As Education Authority, the County Council’s preference is to minimise dispersed growth in favour of an urban intensification strategy. Dispersed growth can conflict with the Department for Education’s ambition to create large schools of two form entry and above; it can create practical difficulties in identifying and developing new sites for schools; and it can result in a higher volume of car-based journeys.

However, as landowner, the County Council comments that more dispersed growth ‘should not be the focus of the growth strategy’ but ‘should support the overall growth strategy’. Expanding existing settlements ‘may be a suitable option’ and new settlements within or beyond the Green Belt ‘may provide a suitable option’.

Radcliffe on Trent Parish Council: No, due to traffic congestion along the A52 corridor.

Ravenshead Parish Council: No, because of settlements losing their identity, poor transport links and infrastructure, and limited employment opportunities.

Rempstone Parish Council: No, due to traffic and infrastructure problems.

Ruddington Parish Council: No. However, ‘there is a considerable amount of very small settlements outside the Green Belt within the borders of Rushcliffe that could potentially benefit from small developments’ and ‘The only viable option for a dispersed growth plan would be developing a brand new settlement with its own facilities and transport network’.

Saxondale Parish Meeting: No; further development within the southern A52/A46 corridor in Rushcliffe would exacerbate serious congestion and pollution issues.

Severn Trent: This approach ‘would reduce the certainty of where and when development will occur’, however ‘the likelihood of longer development timescales may help to support the assessment and development of any necessary infrastructure upgrades’. The use of masterplans would be beneficial for large allocated areas.

Sport England: ‘Sport England does not wish to raise any specific comments on the growth options.’ However, any growth options should be considered alongside health impacts, the creation of healthy and active communities, and community facilities.

Stanford on Soar Parish Council: No: would not support new settlements on Green Belt land or on land which ‘could be better purposed as agricultural land’; any expansion of towns or villages would need to be considered on a case by case basis.

Woodborough Parish Council: No, due to concerns about loss of Green Belt land, increased congestion, commuting and pollution.

Mrs Ruth Edwards MP asked that the representations on this question from parish councils and parish meetings within Rushcliffe are ‘given full and due consideration’.

Summarised comments from developers

Aldergate Properties: Yes, especially as regards the expansion of existing ‘key settlements’ and urban areas, with concerns that new settlements would not deliver in a timely manner.

Aspbury Planning: Yes, including release of land to the south and east of the City that ‘fails to fulfil the purpose of Green Belt designation’.

Barratt David Wilson Homes: Yes, combined with urban intensification and focusing on main towns and rural key settlements.

Barwood Homes and Barwood Land: A ‘balanced portfolio of sites is needed’. Would ‘favour an approach which incorporates a combination of the various Growth Strategy options, with a particular emphasis on the ‘More Dispersed Growth Strategy Option’’. Growth ‘in and adjacent to the urban area and key settlements’ should be prioritised. In a later representation, Barwood Land considers that the majority of development should be located at the largest settlements and that new settlements take a long time for their delivery.

Bloor Homes: considers that the GNSP should incorporate elements of all four strategies.

Bloor Homes Midlands, Boyer Planning, Oxalis Planning (on behalf of ‘unnamed landowners and developers’, among others), Richard Taylor and W Westerman: consider that each of the four growth options put forward should be used; and that there should be a focus on the delivery of a range of sites and locations in order to meet housing needs.

Burhill Group: Yes. It would result in greater provision of affordable housing and would 'disperse the effects of development' such as traffic congestion and noise/air pollution. 'Will also allow a greater range of housing choice and provide the right type of homes in the right areas to meet the needs of all communities.' Build-out times are also quicker on greenfield sites.

CEG Land Promotions: Yes; however, should avoid over-reliance on strategic sites because of delay to delivery. Growth should be focused towards 'settlements that have an identified socio-economic imbalance or would benefit from regeneration'.

Crofts Development, Davidsons Developments, Harris Land

Management, Mather Jamie and Whitefields Farm: Yes. 'It has the greater potential to disperse the impacts of growth, to provide for greater range of housing choices and locations and sites.' However, 'elements of this option would work well as a hybrid'. Mather Jamie also comments that growth should be focused towards 'settlements that have an identified socio-economic imbalance or would benefit from regeneration'.

Crown Estate: 'This approach is a little confused and includes distinct options that need to be assessed separately.' Would 'support a balanced spatial strategy that seeks to use previously developed land and buildings within the MUA, protects the Green Belt and focuses development on a specific number of key service settlements'. It is 'difficult to see why new settlement options would be preferred to settlement expansion'.

Executors of Evelyn Shepperson: Yes; the Plan 'should be guided by a more dispersed approach, rather than an urban intensification focus', although there should not be a 'single strategy', particularly for settlements with good public transport.

Fisher German on behalf of Mr Malcolm Hodgkinson state that this strategy would seek to deliver growth to a wider area, including the delivery of growth in the smaller towns and settlements, not adjacent to the Nottingham urban area. This option includes the potential to deliver a new free-standing settlement in the form of a free-standing 'garden community'. There is however no indication of where such a settlement would be located, or what factors would be considered when choosing such a location. We concur that the eventual growth strategy should be a combination of the approaches.

Fisher German on behalf of Joanna Sztejer state that that the eventual growth strategy should be a combination of the approaches. Given the issues relating to highway capacity and lack of road crossings of the River Trent, it is vital new development is located adjacent to sustainable settlements where there are services, facilities and employment within close reach, or where development can take advantage of existing and new and planned transport infrastructure to access larger centres and the main urban areas. The Council should look favourably on schemes with good access to existing infrastructure, particularly the Nottingham Express Transit (NET)

and heavy rail networks. Hucknall benefits from both a railway station with regular services to Nottingham and Worksop, and access to the NET network. This is a unique advantage, around which substantial growth can be delivered, under the hybrid approach suggested above.

Gaintame and Wilson Bowden Developments: Yes, particularly regarding areas to the west of Nottingham ('where HS2 compromises the integrity of the Green Belt') and close to the existing urban area. Gaintame also comments that there will need to be the provision of a range of housing sites including urban extensions, new settlements and village extensions, having regard to infrastructure and to existing allocations and commitments. In a subsequent representation, Wilson Bowden also suggests combining this strategy with urban intensification and comments that each authority 'could look to impose compensatory improvements to offset any Green Belt that is released adjacent to the Main Built Up Area'.

Gladman: Yes, as it 'will ensure the vitality of communities across the area to support both housing and economic growth'. However, 'the recommended approach would be a combination of options'.

Hall Construction Services: Yes. Key settlements are capable of accommodating additional housing numbers. Such settlements often have stronger housing markets and therefore higher land values, leading to increased choice of housing and increased delivery of affordable housing. The strategy would attract economic development and so lead to a reduction in commuting.

Hallam Land Management: No. However, a new settlement 'should be considered as a stand-alone option', in conjunction with the government's 'Garden Communities Prospectus'.

Hammond Farms and Langridge Homes: Yes. However, they are opposed to new settlements due to long lead-in times, difficulties in identifying suitable sites, high upfront infrastructure costs and the 'lack of any large scale brownfield sites in the countryside'.

Harworth Group, Stagfield Group and Strawsons Group Investments: Yes; however, the option should be retitled 'settlement expansion growth strategy option' and it should exclude development beyond the Green Belt.

Hill Family: Yes. However, 'the most appropriate overall spatial strategy is likely to be a blend of the multiple options identified within the consultation document with the more-dispersed option forming the principle element of this blended option'.

Hollins Strategic Land: Yes, as regards settlements beyond the Green Belt, and especially those with public transport facilities. 'All settlements not within the Green Belt should have the opportunity to grow significantly, particularly rural communities whose demographics are becoming more unbalanced and its vitality is becoming compromised.'

ID Planning on behalf of Mr John Breedon support this strategy. Positives include the potential for more affordable housing due to land values. Greater housing choice and locations could also be secured. Negative impacts include higher Green Belt land loss, congestion, longer commuting and long development timescales for a new garden community. Consider a dispersed approach for housing growth should be supported which directs house.

IM Land: Yes; however, including new homes at existing settlements within the Green Belt rather than outside the Green Belt. Does not object in principle to new settlement proposals, however they have a longer delivery timescale. There 'should be a combination of multiple growth options'.

Jelson Homes and the Wheatcroft Family: Yes; however, expanding suitable existing settlements would deliver houses and amenities more quickly than a new settlement.

John A Wells: The growth strategy should 'focus on a balanced approach' and 'each of the four growth options can be utilised', but without 'too great a focus on a particular strategy'.

Landowner Consortium: Yes, as this will allow a greater number of areas to benefit from new housing development. The Consortium supports the provision of a new settlement.

Newton Nottingham: Yes, particularly as regards 'new developments that will be complementary to existing settlements'. The strategy provides greater flexibility; is likely to be more deliverable; would not necessarily result in higher loss of Green Belt land; and would lead to the loss of 'less sensitive' Green Belt land.

Parker Strategic Land: No, because it would result in more carbon dioxide emissions and would not address economic and social disadvantage. However, 'a proportion of growth can be distributed to support smaller towns and villages'.

Persimmon Homes: 'A plurality of spatial strategies should be employed.' 'Without Treasury intervention the delivery of new settlements poses a significant challenge.' The best option in the short to medium term is the expansion of existing settlements, including a review of the Green Belt. Existing open space and recreational areas within urbanised areas should be preserved.

Positive Homes: 'The Green Belt around Nottingham is fatal to its growth' and results in longer journeys and more pollution.

Richborough Estates: Yes. 'Self-contained developments on the edge of existing settlements can provide swift contributions to housing supply early in the plan period.' However, a new settlement 'would not start delivering housing until the latter years of the plan period'.

Rushcliffe Borough Council (as landowner): Yes. Should be combined with urban intensification; the most appropriate sites are adjacent to the most appropriate locations.

Samworth Farms and Trustees of the Locko 1991 Settlement: The eventual growth strategy should be a combination of urban intensification, more-dispersed and transport-led growth.

Savills on behalf of Rushcliffe Borough Council (RBC) support the “more dispersed” growth option and consider that it should be employed alongside the “Urban Intensification” growth option referred to in question OS1 above. RBC consider that the most sustainable sites are those located adjacent to the most sustainable settlements and that these should be considered as the preferable locations for development in each local authority

South West Nottingham Consortium: The approach of identifying four growth options is ‘misleading and inappropriate’. The growth strategy ‘must consider both the locational aspects of particular locations together with the specific benefits and opportunities of development proposals being put forward’.

Strawsons Group Investments and Taylor Wimpey: consider that ‘this option and urban intensification are not mutually exclusive’ and that ‘the potential for a Garden Community can be an urban extension to the City but also that towns and villages should be assessed for their potential to have some growth.’

Trinity College: No, as it is likely to result in pressure on current infrastructure, although there are merits in the expansion of existing settlements in some circumstances.

University of Nottingham: Yes. ‘This approach reduces infrastructure burdens and provides for a wider range of housing’. It will need to include some development in the Green Belt.

William Davis: Yes. This ensures that the benefits of growth are spread; allows a range of homes and commercial floorspace to be delivered at the same time; has the potential for higher affordable housing contributions; and could include new settlements for delivery during later years of the Plan.

Wilson Bowden Developments support this growth option and consider that it could be suitable in conjunction with the urban intensification growth option. Sites adjacent to the most sustainable settlements in each local authority area should be prioritised for development as they are considered to be within the most sustainable locations. Green Belt loss is considered to be a ‘negative impact’ from this option but each authority could look to impose compensatory improvements to offset any Green Belt that is released adjacent to the Main Built Up Area (NPPF paragraph 138).

Woolbro Morris: Yes; growth should be dispersed to suitable settlements across the plan area.

Summarised comments from other organisations

Burton Joyce Climate Action Group: No; ‘the resulting negative impacts are too great’.

Carlton and Gedling U3A: No; should focus on derelict and brownfield sites, particularly within developed areas.

Home Builders Federation: ‘The preferred Growth Strategy of the GNSP is most likely to be a combination of two or more Growth Strategy Options therefore more dispersed growth should be considered as part of a combination of Growth Strategy Options.’

Keyworth Conservation Area Advisory Group: No, as it is likely to result in semi-rural settlements becoming ‘urbanised and developed beyond what infrastructure of the settlement can sustain’.

Nottingham Credit Union: ‘The strategy should be more diverse but there should be no development in the Green Belt.’

Nottingham Green Party: No; opposed to the expanding of existing settlements within the Green Belt.

Nottingham Local Access Forum: No: this would result in longer commuting journeys and less active travel; and affordable housing needs to be in accessible locations.

Nottingham Open Spaces Forum: Yes; ‘but avoiding increase to commuting etc. Aim for the “15 minute city” ‘.

Nottinghamshire Campaign to Protect Rural England: No, ‘because doing so would mean that the sustainable development the Greater Nottingham Strategy is committed to cannot be achieved’.

Nottinghamshire Ramblers: ‘Development needs to be concentrated but with some dispersion to allow the protection of essential urban green spaces and links to the countryside.’ ‘Green lungs’ should be preserved, the urban landscape should be ‘regreened’ and green corridors to open countryside should be retained.

Nottinghamshire Wildlife Trust: Each site needs to be reviewed individually, with regard to green corridors, wildlife sites, nature reserves, protected species, etc., ‘so it isn’t really possible to support either urban intensification or a more dispersed model’.

Orston and Surrounding Villages Against Inappropriate Development (OSVAID): No, due to harm to the natural environment, harm to the ability to tackle climate change and greater uncertainty relating to housing delivery.

Pedals (Nottingham Cycling Campaign): No, due to potentially longer commuter journeys and less active travel.

Rushcliffe Green Party: Any dispersed growth should respect the needs of local communities and should not be to the exclusion of urban intensification.

Tollerton Against Backdoor Urbanisation (TABU): ‘Development of new settlements beyond the Green Belt is preferable to development within the Green Belt.’

Summarised comments from local residents

114 local residents responded to this question.

Of those who expressed an unequivocal preference (and partially depending on the precise interpretation of some comments), 12 supported the strategy and 43 opposed it.

Many people either supported or opposed the strategy subject to reservations or qualifications.

Many people expressed support for one or more aspects of the strategy but not others; such as either expanding existing settlements or developing new settlements (but not both), or expanding settlements either within or beyond the Green Belt (but not both). Several people also supported expanding settlements in some parts of Greater Nottingham but not others.

In addition to those who supported or opposed the strategy as a whole, several local residents appear to have interpreted the consultation documents as making specific proposals for development in particular locations. They strongly opposed these perceived proposals, in their responses to this question. The areas concerned include: Aslockton, Bingham, Calverton, Elston, Newton, Orston, Rempstone, Ruddington, Woodborough and the A453 corridor.

Developers’ responses to this question often included references to particular sites that they are promoting for development; these aspects of the representations are dealt with separately. A small number of local residents also made representations in support of development of land in their ownership; these too are dealt with separately.

Several Rushcliffe councillors, making representations as individuals, made comments which are included in the summaries below.

Comments in support of the ‘more-dispersed growth strategy option’ included:

- Reduced ‘sprawl’.
- Reduced loss of green areas between towns.
- Less development on urban green spaces and corridors.
- Infrastructure already exists at settlements that could be expanded.
- Less traffic congestion in some villages, compared with less-dispersed development.
- Can support home-working.

- Limited expansion of certain settlements could support local services and 'settlement vitality'.
- Would allow small settlements to grow 'organically', maintaining their identities.
- Settlements should be expanded beyond the Green Belt to the east, south-east and north-east of Nottingham.
- Several people commented that 'there is a considerable amount of very small settlements outside the Green Belt within the borders of Rushcliffe that could potentially benefit from small developments'.
- Several people also commented that there is 'the opportunity to do something truly ground breaking by creating a brand new model eco-village, which is self-sustaining in terms of energy, water and employment, etc'. Some said that this should only be beyond the Green Belt, and some said that it should not involve 'crop-growing farmland'.

Comments in opposition to the 'more-dispersed growth strategy option' included:

- More loss of Green Belt land.
- Increased congestion.
- Increased pollution.
- Increased and longer-distance commuting, poorer public transport.
- Long development timescales for new garden communities.
- Slower housing delivery generally.
- More harm to the local environment.
- More harm to health, wellbeing and services.
- More loss of farmland and food production.
- Harm to the character of the areas concerned, 'boundary creep' leading to towns and villages losing their identity.
- More problems in providing infrastructure.
- Potentially greater problems of flood risk.
- More harm to landscape and 'landscape diversity'.
- More harm to footpaths and other outdoor recreation.
- Fewer regeneration benefits.
- A poor option in terms of 'social justice' for people who can only afford urban living 'but will have to suffer the consequences of an increasingly spoilt countryside'.
- Development should be prioritised within existing settlements and on 'brownfield' sites.
- Development should be focused where there are good transport links.
- Growth should be focused within and adjacent to the Nottingham Urban Area, including adjacent to the A453.

Other comments included:

- Several people commented that the preferred strategy would depend on the exact locations proposed.
- Several people said that there should be a combination of strategies, based on intensification, dispersed and transport-led development.
- Concerns about congestion and commuting will be modified by greater home-working.
- Any development at existing settlements should be small-scale.
- Development should only take place in carefully-selected areas, depending on existing and proposed infrastructure.
- There should be more emphasis on protecting agricultural land and less on protecting 'suitable Green Belt infill land'.
- There should be more growth to the west of the City.
- Expanding existing settlements and developing new settlements 'are very different and might have been better presented as two separate options'.
- The consultation 'presents an inadequate evidence base to allow an informed assessment'.
- Fewer, larger developments are preferable to more, smaller developments.
- A range of locations and sizes helps short-term delivery.
- Expanding existing settlements is less likely to be appropriate without significant investment in affordable housing and public transport.
- Existing settlements in the Green Belt should 'only be expanded to make them more viable'.
- 'Sympathetic' development could be allowed in the Green Belt if it did not result in the coalescence of settlements.
- 'If Green Belt has to be used it should be near existing transport corridors such as the M1.'
- 'There has to be a consideration for existing residents who gain nothing from new developments, only a reduction in quality of life'; 'The input of development should only enhance existing residents' lives'.
- 'Developers will not deliver anything except what is most profitable for themselves.'

3. **Question OS3: Green and Blue Infrastructure-Led Growth Strategy Option**

Should we continue to prioritise development that can enhance the strategic river corridors, canal corridors, the Greenwood Community Forest and urban fringe areas, and/or prioritise other GBI assets?

Summarised comments from statutory organisations

Amber Valley Borough Council identifies the potential for further development within the northern part of Broxtowe Borough as most likely to impact on Amber Valley. Any significant growth in this location could have economic benefits to Amber Valley residents as well as offer transport improvements (including NET extension) along the A610 corridor.

Aslockton and Granby cum Sutton Parish Councils support a GBI led approach. Aslockton PC specifically highlight the redevelopment of disused collieries into country parks with adjacent housing provided as successful schemes that deliver accessible open spaces (unlike Green Belt countryside).

Barton in Fabis and Kingston on Soar Parish Councils support the principle of urban intensification as the priority as any alternative, including this one, would lead to the loss of Green Belt. Barton in Fabis also suggest a more dispersed growth strategy option for development beyond the urban area. This would entail a balanced portfolio of sites on the edge of settlements or new settlements. The Chairman of the PC highlighted concerns that the GBI led approach may result in loss of Green Belt and destroy the GBI assets/corridors they were supposed to protect and enhance.

Burton Joyce Parish Council support the adding to and connecting of GBI, however within Burton Joyce the priority should be safeguarding GBI assets from development. The benefits of this approach appear entirely compatible with the Urban Intensification Growth Strategy and a combination of the two should be sought.

Calverton Parish Council believe that existing and new areas of GBI should be given equal priority and that there is a danger that development will be directed to locations deemed to have lower environmental value, rather than working to improve it.

Chetwynd: The Toton and Chilwell Neighbourhood Forum highlight the use of the ANGSt model and Nature Nearby: Accessible Natural Greenspace Guidance (2010).

The Environment Agency are supportive of this approach. A focus on enhancing GBI is likely to achieve multi-functional benefits, ranging from improved habitats and biodiversity through to reductions in the level of flood risk as a result of reconnecting areas of land to the natural floodplain.

Gotham Parish Council, Ratcliffe on Soar, Stanford on Soar and Thrumpton Parish Councils/Meetings do not support this approach, instead favouring urban intensification. The negative impacts of a focus on a 'Green and Blue Infrastructure – Led Approach' are similar to a 'More Dispersed Growth Strategy'. Stanford on Soar highlight concerns regarding ecological and flood risk implications.

Historic England state that a strategy based on GBI would need to ensure heritage assets and setting are conserved or enhanced. Opportunities for heritage led regeneration could be identified within the Plan, and for heritage led place making as a result of the Greater Nottingham area's rich industrial legacy and historic landscape character.

Holme Pierrepont and Gamston Parish Council have raised concerns regarding the potential loss of Green Belt, and need to ensure defensible boundaries.

Linby Parish Council state that it is also important for new development to be supported by green infrastructure as part of any development.

Natural England are supportive of an approach which would enhance Green and Blue Infrastructure corridors. They also encourage the incorporation of Green Infrastructure within all development proposals.

Natural England suggest that as well as GBI, the Strategy could identify possible sites which would contribute to the Nature Recovery Network (NRN), including those that deliver biodiversity off-setting. The Nottinghamshire Biodiversity Opportunities Map would be a valuable tool to identify these areas and Natural England also has mapping information on the national habitat network.

Radcliffe Parish Council believe the 6C's Green Infrastructure Strategy (2010) is fundamentally sound, namely the planned network of linked-up green spaces threading out from the urban area and utilising the main river corridors as its backbone. However, focusing on river corridors may result in development in areas of flood risk.

Saxondale Parish Council is concerned that development along the river corridors are limited and subject to severe flood risk.

Severn Trent Water are supportive of GBI and would encourage that development looks to incorporate and enhance GBI. This approach will need to be undertaken carefully ensuring that the delivery of essential infrastructure can also be provided without additional harm to other GBI areas.

Tollerton Parish Council support a transport led growth strategy, noting the recent upgrading of capacity on the A453, development corporation site at Ratcliffe and East Midlands Parkway as opportunities for sustainable development.

Summarised comments from developers

Barwood Homes, Hall Construction Services Ltd and JW Planning Ltd prefer a more-Dispersed Growth Strategy Option' which would involve expanding existing settlements or developing new settlements. They have highlighted their land at Hollygate Lane, Cotgrave as being sustainably located.

Bloor Homes, Barrett David Wilson Homes, Crofts Developments, Davidsons Developments Ltd, Harris Land Management, Parker Strategic Land, Mather Jamie Ltd and Taylor Wimpey emphasis that the plan should incorporate a hybrid of all, or some of the four strategy options to realise sustainable development in the Greater Nottingham. It should consider both the locational attributes of particular locations together with the specific benefits (including the ability to minimise harm) of development proposals being put forward. This includes sustainably located green field sites in order to meet needs. Focusing on GBI could direct development to environmentally sensitive locations and flood zones.

Hallam Land state that GBI should continue to be prioritised. Strategic development proposals that are able to deliver meaningful Green and Blue Infrastructure enhancements, particularly in terms of linking existing corridors and addressing any gaps, should be preferred. **Fisher German** (representing a number of landowners) also highlighted the opportunities of linking strategic development with strategic GBI, if GBI were prioritised.

Hammond Farms, Langridge Homes Ltd and Trinity College support measures to enhance GBI assets and corridors as part of developments. They do not believe that development should be off-limits within these corridors. Langridge Homes specifically highlight opportunities to enhance urban fringe areas at Lodge Farm Lane. Trinity College identify the opportunities provided by larger strategic extensions to integrate GBI.

Hollins Strategic Land support green and blue infrastructure as a key priority of the Plan, highlighting the opportunities provided at their site in Aslockton.

The Crown Estate, House Builders Federation, IM Land, Pegasus Group, Whitefields Farm and Westerman Ltd are concerned that that a GBI strategy would locate development within flood zones and areas of ecological sensitivity. **Davidsons Developments, Harris Land Management and Whitefields Farm** consider these constraints will limit the amount of development that can be directed to these corridors. Focusing a strategy around GBI ignores opportunities to deliver growth in less sensitive locations. Enhancements should be addressed via individual strategic allocations rather than as a Growth Strategy Option. The Crown Estate highlights opportunities north of Bingham.

Mather Jamie and Parker Strategic Land each identify their land at Catstone Green as providing an opportunity to enhancing GBI including Strelley Historic Parklands for public access.

Oxalis (representing unnamed landowners), the South West Nottingham Consortium and Westerman Ltd believe that all growth options can contribute to sustainable development, but focus on one could result in unsustainable development. A key element of the strategy should promote accessible development (to employment, services and facilities) that minimises harm, and retains and enhances green space for the benefit of communities. The strategy should include a focus on growth where there are existing or planned transport improvements and other infrastructure. The AECOM report must be used in this context.

Richborough Estates believe that a strategy of focusing development primarily around existing GBI would be unlikely to lead to sufficient deliverable sites being brought forward to meet local requirements.

Greenberg, Harworth Group, Hutchinson, Herrick, Gaintame Ltd, Samworths Farms Ltd, Stagfield Group, Stubbs and Whittington and Strawsons Group Investments Ltd did not consider this a strategic option rather GBI should be delivered alongside developments. Where sites provide opportunities to improve GBI this should be given weight and planned effectively.

Wells Ltd state that the strategy should be balanced to achieve sustainable development which utilises different development types of locations. The strategy will need to allocate development sites which are outside the existing urban area. This could include new settlements, urban extensions, or smaller scale development in villages or, most likely, a combination of all and include land in the Green Belt.

Summarised comments from other organisations

Burton Joyce Climate Action Group, CPRE, Nottingham Open Spaces Forum, and Keyworth Conservation Area Advisory Group support a GBI led approach, however some highlight that it is vital that development which would harm wildlife corridors or specific sites, or is in flood zones should not be permitted. **Nottingham Open Spaces Forum** also highlight the need to develop lower level corridors. The CPRE state that the GBI benefits of Green Belt should be recognised.

The Canal & River Trust considers that strategic river and canal corridors should continue to be prioritised for appropriate development that can enhance them and assist in allowing them to realise their potential as multi-functional resources.

Carlton and Gedling U3A support enhancements that deliver new infrastructure (paths, cycle ways and wildlife corridors), but not waterfront flats.

The Grantham Canal Society highlight the importance of the canal as a heritage, active travel, recreational asset. It also contributes to the drainage of areas prone to flooding and is popular with local residents along its length.

The potential benefits provided by improvements to Lings Bar (which could reconnect the canal) and the Gamston urban extension are also identified.

The Nottingham Credit Union identify the northern bank of the River Trent as being an underused resource.

The Nottingham Green Party encourages the enhancement of the river corridors and green spaces and specifically highlights the advantages of re-wilding (notably carbon sequestration). Development must demonstrate more than just minute net gains in biodiversity. The Rushcliffe Green Party is concerned that developing GBI corridors is no different to other urban sprawl.

The Nottingham Local Access Forum and Pedals state that any growth option should deliver good green and blue infrastructure as part of a network. Good, safe, attractive and coherent routes for walkers and cyclists should be an integral part of the existing and proposed blue/green infrastructure and enable developments to connect the centre of Nottingham with its surrounding countryside as well as to and from green spaces within the urban area.

The Nottinghamshire Ramblers believe that GBI must address both nature and green assets, its biodiversity and accessibility. Too often 'enhancing' means simple uniform sports pitches of very low value to wildlife and little to engage other users. The overall value of Green and Blue assets depends on their structural natural complexity. They also highlight the importance of retaining green corridors to open countryside and active travel routes within them.

The Nottinghamshire Wildlife Trust believe that the consideration of GBI issues should be undertaken on a site basis, rather than a generalised approach. The Trust is concerned that the 6Cs study is being used to deliver GI in conjunction with major development.

The Rushcliffe Borough Councillors for Gotham and Leake do not support the prioritisation of development that can enhance GBI. The Councillor for Gotham states that the preferred approach should be urban intensification rather than development within GBI corridors risks destroying the very value of the corridors themselves. The Councillor for Leake considers it contradictory.

Summarised comments from local residents

Whilst many residents supported a GBI led strategy (as development could enhance GBI and benefit wildlife), this support was conditional on the prioritisation of environment considerations as there are concerns that if development was GBI led, developments would be given green credentials that are either not delivered or result in the loss of valued habitats. It may also result in increased pollution if located away from urban areas or those served by public transport.

Regarding enhancement of GBI, as much emphasis should be placed to 'filling in the gaps' as to preserving the existing areas of environmental value. Development should not just be located in areas of lower environmental value; it should improve the biodiversity resources of those areas.

Many opposed the GBI led strategy, favouring urban intensification, as development cannot enhance GBI as it will encourage the development of floodplains and increased risks of flooding elsewhere, including beyond the plan area; result in the loss of Green Belt (development should be within urban areas); erode the urban fringe environment; and adversely affect wildlife (as a direct result of habitat loss or indirect effects of increased congestion, pollution (air and water) and residential occupation).

The plan should ensure GBI is located in close proximity to residents, this includes access to local countryside. It should be contiguous with cycling and walking corridors. Specific opportunities for GBI led development were identified between Gamston to Cotgrave along the canal, along the Erewash valley, woodland and lakes east of Ilkeston.

Developments should include streets lined with trees. Nottingham needs to build upwards with rooftop gardens.

Development of less sensitive Green Belt sites should be facilitated in the plan, notably infill or brownfield sites.

Concerns that by focusing on the strategic network will prevent attention being given to local GBI deficiencies were expressed.

The opportunities provided by protecting and enhancing the Grantham Canal were highlighted by a number of residents.

4. **Question OS4: Transport-Led Growth Strategy Option**

To what extent should the location of development relate to existing and proposed transport infrastructure?

Summarised comments from statutory organisations

There was widespread support from statutory consultees for accessibility to be included as a key factor in determining suitable locations for growth. Although many supported a strategy informed by transport considerations, a large number considered it to be appropriate to pursue this as part of mixed growth strategy with a combination of the other growth options.

Aslockton and Papplewick Parish Councils highlight the importance of proposed transport infrastructure being in place before or during construction phases of new development.

Barton in Fabis, Gotham, Thrumpton, Ratcliffe on Soar and Kingston on Soar Parish Councils also stress the importance of front loading transport infrastructure improvements before first occupation. They also highlight that other environmental impacts should be considered alongside the benefits of reduced pollution when considering greater public transport use.

Bradmore Parish Council, Granby Parish Council and Rempstone Parish Councils state their support of a strategy that focusses on areas where there is good existing transport infrastructure, particular public transport or where there are proposals to improve public transport infrastructure.

Holme Pierrepont Parish Council echo this view, citing poor public transport connections to the east of the city as being justification for not including any additional allocations in this area.

East Leake Parish Council share this view highlighting the importance of following such a strategy to reduce carbon emissions and combat climate change.

Ruddington Parish Council state that new sites should be prioritised based on accessibility to existing and proposed tram routes, existing sustainable bus routes (with consideration given to whether this would create additional congestion) and access to train stations and HS2 via public transport.

Calverton Parish Council also support a strategy focussing development around existing accessible areas and state that other areas should only be considered once new transport infrastructure has been delivered. They state that dispersed development should be avoided due to the conflict with climate change objectives and the NPPF. Calverton Parish Council suggest that the methodology for determining housing figures for each authority should take into account transport accessibility and discount areas without the required transport infrastructure (i.e. rural areas with poor accessibility).

Burton Joyce Parish Council argue that the planned transport improvements will meet current need rather than any future growth needs. They also stress the need to consider other negative impacts that may arise from a transport led strategy and the potential undesirability of locating new housing adjacent to large scale employment.

Linby Parish Council and Papplewick Parish Council state the existing transport infrastructure should be one of the factors taken into account when deciding on suitable sites for development. Linby Parish Council state that development that facilitates the extension of existing public transport corridors would contribute to sustainable growth.

Ravenshead Parish Council also highlight the need for reliable and affordable public transport.

Stanford on Soar Parish Council state their preference for an urban intensification strategy but also support a transport led strategy.

Saxondale Parish Meeting suggest development around Saxondale would be inappropriate due to heavy congestion and limited rail services. Develop around opportunities at NET and HS2 links. Further development in NG12/NG13 would increase existing congestion.

In terms of large scale transport infrastructure projects (NET and HS2), there was support for focussing new development adjacent to these hubs but concern about the lack of certainty of these going ahead and the cost.

Bingham Town Council state that a strategy should be based around HS2 and the development corporation due to the nationally and regional significance of these projects. Tollerton Parish Council state their support for a transport led strategy citing the A453 corridor and East Midlands Parkway station/power station as suitable areas for new growth. This view is shared by Radcliffe on Trent Parish Council who also highlight the sustainability credentials from having new employment at this site.

Highways England expressed their support for a transport led strategy, with sites selected based on the ability to deliver sustainable development and be serviced by sustainable transport. This view was shared by the majority of parish councils who responded.

Chetwynd: The Toton and Chilwell Neighbourhood Forum support development around the East Midlands Hub station and the improvement of public transport and active and sustainable travel in this area. They also highlight a discrepancy in the consultation document at paragraph 2.17 stating the tram already extends to Toton, suggesting this should be changed to EM Hub station

There was strong support for the incorporation of active sustainable travel as part of any strategy. **Natural England** state their support for sustainable transport methods such as cycleways and footpaths – highlighting how they reduce pollution and can be combined with habitat creation to form valuable

blue and green infrastructure, and can link to green spaces near people's homes. Road building has the potential to break habitat connectivity in the landscape with adverse impacts on the ambition to develop a Nature Recovery Network.

Nottinghamshire Wildlife Trust states the importance of biodiversity impacts being considered on a site by site basis. They stress the importance of good connections for any new allocation in terms of sustainability objectives

Other comments received include **Amber Valley Borough Council** who highlight that further development within the northern part of Broxtowe Borough could have economic benefits to Amber Valley residents.

Historic England highlight that a transport led growth strategy would need to ensure heritage assets and setting are conserved and enhanced.

Nottinghamshire County Council reiterate their continued role in engaging with the Strategic Plan, highlighting continued engagement with neighbouring transport authorities in developing a robust evidence base can be prepared in support of the Infrastructure Delivery Plan (IDP). This will be undertaken using the latest East Midlands Gateway Transport Model so that the necessary strategic transport infrastructure (up to 2038) can be determined. They highlight that on figure 2.5 the possible tram extension to the north of Hucknall (Top Wighay Farm) is not shown. They suggest the review should consider further connectivity for housing and employment sites in Hucknall. They highlight how this strategy accords with the NPPF's promotion of sustainable travel but suggest more detail could be included on active travel and the integral role this plays in well designed proposals and the health of residents. It is suggested that the plan review embeds the principles of the "The King's Fund: Active and Safe Travel" in any chosen strategy.

Severn Trent (Sewerage Management Planning) request that a co-ordinated approach is taken to ensure that if new land is developed associated services such as water mains and sewers are integrated at the same time. They request this is highlighted within any Infrastructure Delivery Plan.

Sport England request that any growth option is considered against health impacts and the creation of healthy and active communities.

Summarised comments from developers

A large number of respondents support a mixed use growth strategy based on a combinations of the growth options presented. **Barwood Homes, Barratt David Wilson Homes, Barwood Land, Bloor, Crofts Developments, Davidsons, Hammond Farms, Langridge Homes, Samworth Farms, the South West Nottingham consortium, Taylor Wimpey, The Trustees of the Locko 1991 Settlement, Ms Sztejer (landowner) and Mr Hodgkinson (landowner)** all express this view.

A number of respondents acknowledge the importance of transport infrastructure (existing and proposed) as a critical factor in deciding locations for future growth. These include **Trinity College and S and C Voce (landowners)** who support a strategy based on utilising existing and planned transport infrastructure on the edge of existing settlements. **Mr Taylor (landowner)** shares this view stating that areas which are accessible by sustainable transport modes should be prioritised. Langridge Homes consider development along existing key accessible routes and those areas with potential of should be prioritised (specifying the A60 Mansfield Road corridor (due to with opportunity for a park and ride site at Leapool), the route of the Gedling Access Road (with extension of the NET), Bingham – Cotgrave transport corridor and Hucknall – Bestwood transport corridor).

Oxalis state their concern that too great a focus on one specific strategy would compromise other sustainability aims or other key planning objectives. For example, pursuing a strategy of urban concentration may result in loss of urban green spaces and quality of the urban environment. Connectivity and accessibility of sites to employment opportunities and services are cited as key criteria in terms of selecting appropriate development sites and the objective of sustainable development.

A number of respondents highlight the importance of sustainable transport networks in determining suitable locations for future growth. **Woolbro Morris** refer to paragraphs 137 and 138 of the NPPF which states that first consideration should be given to land which has been previously-developed and/or is well-served by public transport. Although a large number acknowledge the potential benefits of planning new growth in proximity to HS2 and planned NET extensions, some highlight that existing public transport links can be improved (e.g. by increasing frequency of services). **Stagfield Group** stress this point and also highlight the importance of proximity of settlements to the city centre in encouraging more active modes of sustainable travel.

The landowner consortium south of Orston stress the importance of new development being well connected to the existing transport network with the focus of a transport led strategy on sustainable transport methods. They suggest the NET needs to be extended to a new park and ride site at **Radcliffe on Trent**. They state that all new development needs to be designed around pedestrian and cycle connections. **Parker Strategic** also stress the importance of new development being sited in areas that benefit from good public transport or are close to the urban area or employment areas, specifying sites at Cotgrave and Catstone Green being such examples. They highlight the importance of this on reducing carbon emissions

Those in support of development in proximity to HS2 include **Mr and Mrs Peacock (landowners)**. Those supporting development in proximity to potential NET extensions include **Barwood Land (Middlebeck Farm), Ms Sztejer (landowner) and Mr Hodgkinson (landowner)** who argue for the

suitability of Hucknall for additional development and **W Westerman Limited and Strawsons Property (landowners)** due to the possibility of a tram extension from Phoenix Park toward Kimberly.

A number of respondents also highlight the importance of proximity of heavy rail routes. **Hollins Strategy** support development along the Bingham – Aslockton corridor citing its suitability under a transport led strategy due to the rail availability. **Samworth Farms** (with Samworth Farms citing Radcliffe on Trent), settlements which are accessible by rail or the NET.

The Home Builders Federation and others (Crofts Developments, Harris Land Management, Davidsons, Mather Jamie, Whitefields Farm), acknowledge the opportunity extensions of the NET and HS2 present but warn of the uncertainties over funding and the impacts on deliverability if this isn't secured, citing it a "high risk strategy" to rely on large scale projects such as this and HS2. The HBF also warn that prioritising such large scale infrastructure may be at the expense of other types of infrastructure. IM Land recognise the importance of HS2 but stress the importance of ensuring any new development reflect the timescales for its delivery. They argue that as the current timescales for HS2 indicate that it may well not deliver until late in the plan period, or even beyond it, any sites allocated in relation to Toton should only make a minimum contribution to housing delivery within the plan period.

Further to this, **IM Land** highlight that the existing and proposed infrastructure shown on Figure 2.5 are to meet existing demand, including the existing allocated urban extensions. If further strategic allocations are made adjacent to the urban area then realistic delivery assumptions need to be applied (given the delay in delivery of existing strategic allocations). **Richborough Estates** share IM Land's view arguing that as the areas served by the proposed new infrastructure have already been identified for development, additional allocations in these areas would not be able to contribute to housing supply in the plan period. This they argue is justification for why a transport led strategy is not appropriate.

Other issues that were raised in relation to a transport led strategy include the need for a fourth Trent crossing (**Samworth Farms and Taylor Wimpey**). Taylor Wimpey also suggest further assessment is required in relation to accessibility and deliverability factors.

Summarised comments from other organisations

Homes England and the Defence Infrastructure Organisation highlight the suitability of the allocation of Chetwynd Barracks as part of a transport led strategy due to the proximity of the site to the proposed HS2 station at Toton.

Nottinghamshire Campaign to Protect Rural England stress the lack of integration of public transport and cycling networks to neighbouring centres, citing Stapleford and Beeston as an example of this. They object to

focussing development around the HS2 hub at Toton on the grounds that this would create a competing centre to Nottingham which would lead to the need for more people to travel to Toton, contrary to the aim of the Strategic Plan of reducing the need to travel.

There was widespread support for transport considerations being a critical factor in deciding suitable locations for future growth. **Carlton and Gedling U3A** state that proposed transport should follow the plan, not lead it. **Keyworth Conservation Area Advisory Group** state that although development should account for transport growth, it should not be led by it.

There was criticism expressed from the **East Leake Ward Members** that a transport led growth strategy would place too much emphasis on road building at the expense of developing communities. A **Ruddington ward member** suggested an alternative growth strategy of developing a large garden village style development would be more appropriate than a transport led strategy as this would be of a scale to generate the required large scale transport infrastructure requirements as opposed to smaller piecemeal expansion of settlements.

A number of comments related to the desire for improved sustainable and active travel. **Nottingham Green Party and the Nottingham Local Access Forum** state that any major development should demonstrate integration with existing public transport systems and focus on sustainable transport links. **Nottingham Open Spaces Forum** concur, stating that any strategy be based around reducing the need for travel and prioritisation of carbon free public transport.

Burton Joyce Climate Action group stress the importance of good public transport links and the promotion of active transport in respect of reducing carbon emissions.

Pedals (Nottingham Cycling Campaign) and Nottinghamshire Ramblers stress the central role active travel and other sustainable transport infrastructure should play in any strategy. They both state that design and implementation of Active Travel routes should follow the guidance in the new DfT Local Transport 1/20 Report on 'Cycle Infrastructure Design' and particularly its Core design principle, i.e. that "Networks should be Coherent, Direct, Safe, Comfortable and Attractive".

Railfuture (East Midlands Branch) express their disappointment at what they consider to be a lack of detail in the consultation document on specific transport proposals and the reliance on the existing road network.

An Abbey Ward member for Rushcliffe states the need for transport to be a key consideration in choosing sites for development.

In relation to the tram, **Nottingham Credit Union** highlight this would be too slow for long distance commuting and priority should be given to providing park and ride facilities.

OSVAID (Orston & Surrounding Villages Against Inappropriate Development) state their preference for an urban concentration and renewal strategy on the basis that this offers the greatest opportunity for utilising existing and planned transport infrastructure (i.e .tram and HS2).

Tollerton Against Backdoor Urbanisation (TABU) state that existing and proposed transport infrastructure is the most important consideration in determining suitable locations for development.

Rushcliffe Green Party propose more focus is needed on low carbon alternatives and designing out the requirement for widespread car use.

County Councillor Wheeler states the focus should be on using public transport and cycling and stresses that by developing in and around the City Centre, where there is space, and around Toton for HS2 and areas like Chillwell, this will allow less car use.

Summarised comments from local residents

A large number of respondents from the public stated their support for locating new development where there are good existing transport links (with an emphasis on public transport).

There was an appeal for required transport infrastructure improvements to be front loaded and be in place before new houses are occupied.

Whereas there was support for large scale public transport improvements, there was a noticeable lack of support for new road building. Links between encouraging public transport usage, active transport and reducing car usage and climate change objectives were strongly emphasised.

There was support for extending the tram with a number of suggestions for where these should go (e.g. East Midlands Airport/ M1, Gedling, A52 corridor).

There was also support for planning new development adjacent to the HS2 hub (although the uncertainty of the project was highlighted). Although there was support for these large scale infrastructure improvements (NET and HS2) there was also strong support for improving existing public transport, primarily bus routes and train routes (i.e by increasing existing frequency) and support for additional park and ride sites.

Some respondents mentioned this would be less expensive and more beneficial than pursuing a more high risk strategy focussed around large scale new infrastructure projects (i.e. HS2 and NET).

The urban concentration strategy was considered by many to be complementary to the transport led strategy stating the need to reduce length of journeys and the better public transport connections in the urban area.

Several respondents objected to further development in the rural areas which are less accessible, with longer journeys and less frequent and

available public transport available in these locations. Existing road congestion on certain routes into Nottingham was also highlighted as being a factor for restricting growth in these areas (with A60 Mansfield Road and routes east of Nottingham into Rushcliffe highlighted specifically).

The desirability of planning for mixed use schemes with a variety of uses was highlighted as an important way of reducing journeys (e.g. 15 minute neighbourhoods). Better integration of existing public transport and active travel, primarily in the urban area, was also highlighted as an area that could be improved.

Concern was also raised by a number of people that a transport led strategy may also have negative environmental impacts and these should also be considered (i.e. developing sites adjacent to urban area would still have an impact on wildlife for example) and accessibility should not be the only consideration when deciding on new growth areas (e.g. there may be benefit in regenerating a brownfield site in a more isolated location).

Some respondents stated their preference for a growth strategy that was focussed around developing a large garden village type development instead of smaller piecemeal extensions of existing settlements.

A smaller number of respondents mentioned the need for plans to adapt to the changing commuting patterns post covid (i.e. more home working and less commuting), the need for an additional Trent Crossing and the need to better integrate existing public transport nodes and active travel (through improvements of cycle networks).

5. **Question OS5: Climate change**

How can we address climate change and in particular drive the area to becoming 'carbon neutral' within the Plan period?

Summarised comments from statutory organisations

Amber Valley Borough Council along with the other local authorities within the Derby Housing Market Area, have recognised the importance of a joint approach to securing appropriate evidence to underpin effective planning policies to tackle climate change. A similar approach is advocated in developing the Greater Nottingham Strategic Plan, as well as recognising the opportunity for the various local authorities to work together on a sub-regional basis to tackle climate change through the planning process.

Aslockton Parish Council suggest that the plan facilitates a drastic reduction of individual private car journeys. People are more likely to walk or cycle to their work or amenities if the distance is short and safe. Infrastructure should no longer be designed around the needs of the car but rather the needs of the "weaker" traffic participants.

Barton in Fabis Parish Council suggest that the Councils should adopt a 3-stage process: articulate a vision of where we want to get to; engage local communities; and set targets and milestones. As a first step, the Councils should commission an examination of best practice and learning from other exemplar Councils' strategies. The approach adopted in Peterborough may be helpful in creating a vision for Greater Nottingham.

Bradmore Parish Council comment that addressing climate change is not compatible with developing a large area of countryside in the Green Belt, like the Land East of Loughborough Road (R12.4). Building houses on agricultural land is not compatible with achieving carbon neutrality.

Burton Joyce Parish Council consider that new building should be to the maximum standards of insulation and energy efficiency and achieve carbon neutrality. Insofar as Local Authorities' powers are insufficient, they should exert maximum pressure on central government to give the required powers or to enforce such requirements centrally. Other buildings should also have adaptations to reach such standards in time. Forms of transport and industrial processes that emit large quantities of Carbon Dioxide, should be replaced with more environmentally friendly alternatives. Provision for solar farms should be a positive target.

Calverton Parish Council note that evidence suggests that it would be reasonable for this strategic plan to emphasise the importance of siting development in sustainable locations that have good links to the principal transport corridors to reduce average journey lengths. Development patterns should promote access to the key public transport routes provided by Nottingham Express Transit.

Congestion on roads like the A60 in Gedling Borough has been exacerbated by recent new housing allocations. This suggests that a strategy based on urban concentration of development, with easy access to the NET and other public transport provision and the strategic road network, would be preferable to a strategy of dispersed rural development and allocations within key rural settlements that are isolated from the existing principal transport infrastructure.

Calverton Parish Council query how Gedling Borough Council will meet its target to be Carbon Neutral by 2030 if 3-5,000 houses are planned for a village you have to access by road. Electric cars are still expensive and the second hand market is still out of reach of many. The Village is serviced by a bus company and during core hours runs every 15 minutes to and from Nottingham City centre. The village suffers with flooding due to its topography and being in a valley, the main drains cannot cope with a sudden downpour.

Chetwynd: The Toton and Chilwell Neighbourhood Forum suggest greater provision of green infrastructure, in particular by increasing the extent of urban forests. Sustainable Transport, High Efficiency Buildings, Modern Methods of Construction, Green Energy Initiatives – solar and air/ground source heat pumps, district heating systems etc., Rain and Greywater Recycling, Improving and Enhancing Green/Blue Infrastructure.

Derbyshire County Council welcome that climate change and the importance of the need to mitigate the impact of climate change through the Strategic Plan are reflected in the GOC, particularly paragraphs 1.8 and 2.19. Reference should be made to the D2N2 Energy Strategy. Throughout the document, reference is made to flooding in relation to climate change but not to 'over-heating' which should be addressed through building design and through blue-green infrastructure.

Environment Agency suggest that the easiest way to address climate change is to locate the majority of new development in areas at no (or low) risk of flooding. The Strategic Plan could increase the % requirement for biodiversity net gain over the 10% requirement in the Environment Bill.

Gotham Parish Council suggest that the Councils should adopt a 3-stage process: articulate a vision of where we want to get to; engage local communities; and set targets and milestones. As a first step, the Councils should commission an examination of best practice and learning from other exemplar Councils' strategies. The approach adopted in Peterborough may be helpful in creating a vision for Greater Nottingham.

Granby cum Sutton Parish Council suggest this can be achieved by making 'carbon neutral' measures a condition of the planning approval for all development applications.

Historic England commented that to meet the Government's target of being carbon neutral by 2050 we must recycle, reuse and responsibly adapt our existing historic buildings. Historic England's Heritage Counts document No

Place Like Old Homes sets out how reusing our built historic environment can help reduce carbon. The Plan could consider setting this out as a basis for Part 2 plans or including as part of a strategic climate change policy

Homes England note the 'resolution' for Rushcliffe Borough to be carbon neutral by 2030. It is necessary for the Strategic Plan to set out how carbon neutrality will be achieved, so that it can be understood how development on sites such as Fairham may contribute to this objective. Particularly given that Fairham will be largely built out by 2030.

Kingston on Soar Parish Council suggest that the Councils adopt a 3-stage process: articulate a vision of where we want to get to, engage local communities in the Vision and Plan, set targets and milestones to monitor and celebrate achievement. As a first step, the Councils should commission an examination of best practice, including Peterborough. A strong climate change strategy has the scope to create jobs and grow the local economy locally and it is diverse facilitating wider engagement. Nottingham City Council has taken appropriate steps towards becoming carbon neutral as set out in their 2020-2028 Action Plan. If this could be expanded throughout Greater Nottingham, it could result in developments having a smaller carbon impact across the Plan.

Natural England refer to the shared vision produced by Natural England, the Environment Agency and the Forestry Commission to use nature-based solutions to tackle the climate and ecological emergency. This includes through delivering large-scale woodland planting in the right places, protecting and restoring peatlands, supporting farmers towards net zero, working with nature to manage flood risk, taking a strategic approach to land use, encouraging the use of less carbon intensive materials and pushing for action across the UK and abroad.

Nottinghamshire County Council note that air quality is a key environmental factor that has an impact on health. The use of the recently finalised East Midlands Air Quality and Emissions Mitigation Guidance for the East Midlands is recommended. The plan should incorporate a statement about renewable energy and ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping.

Radcliffe on Trent Parish Council ask that turbines are installed at all weirs along the River Trent by a target date and that the planting of energy crops, managed woodland and agricultural practices is incentivised. Rainwater harvesting and solar panels on all new houses should be encouraged. D2N2 initiatives that encourage investment in alternative energy systems should be supported.

Ratcliffe on Soar Parish Meeting suggest that the Councils adopt a 3-stage process: articulate a vision, engage local communities and set target/milestones. Recommend the approach adopted in Peterborough (links provided). See also the Nottingham City Council 2020-2028 Action

Plan which includes aspirations for planning policy e.g. a Carbon Neutral Supplementary Planning Document. This should be expanded throughout Greater Nottingham.

Ruddington Parish Council suggest that all sites considered for the next stage of the plan need to ensure:

- Greenspace is protected, especially between residential areas, to prevent pollution and amalgamation of urban areas
- Avoid building developments on floodplains or areas at risk of flooding.
- Journeys to and from areas of economic and commercial areas are short to minimise journeys via car
- New developments promote walking/ cycling
- Adequate recycling facilities are provided.

Saxondale Parish Meeting suggest that a joined up approach is needed, using parish and community councils to drive ideas forward. More solar panelling and investment in alternative energy systems.

Severn Trent (Sewerage Management Planning) recommend that any carbon neutral proposals consider implementing water efficient design to reduce consumption of water and minimise the need to process water for use manage water within the development and treat wastewater before discharge.

Urban Vision Enterprise on behalf of Linby Parish Council suggest that the strategic aims should set the priorities to achieve carbon neutrality and on a practical level the strategic plan should:

- Plan for more sustainable live-work patterns;
- Enable sustainable travel to reduce car journeys;
- Regenerate existing centres rather than creating dispersed settlements; and
- Re-populate town and city centres to keep people close to employment.

Summarised comments from developers

Andrew Hiorns Planning on behalf of Mather Jamie notes that COs emissions must be reduced through reducing the reliance on cars, through site design, by identifying site planning measures that provide for passive solar design, and through setting new standards and encouraging accelerated take up of low and zero carbon techniques and technologies. It is important there is clarity on the policy approach and there is consistency across the districts. Is important to ensure that climate change measures in advance of national government requirements do not threaten the viability of or slow housing delivery rates. The take up of low and zero carbon approaches can be accelerated at Catstone Green. The potential for local district heat and power and heat distribution systems is being explored.

Andrew Hiorns Planning on behalf of

- **Parker Strategic Land Limited (site at Cotgrave)**
- **Parker Strategic Land Limited (land south of Nottingham Road, Broxtowe)**
- **Parker Strategic Land Limited (Catstone Green site)**

notes that COs emissions must be reduced through reducing the reliance on cars, through site design, by identifying site planning measures that provide for passive solar design, and through setting new standards and encouraging accelerated take up of low and zero carbon techniques and technologies. This site can connect to Catstone Green to the north and could exceed current standards.

Avison Young on behalf of Homes England and the Defence

Infrastructure Organisation request that the draft plan sets out how carbon neutrality will be achieved, so that it can be understood how development on sites such as Chetwynd Barracks may contribute to this objective.

Bidwells on behalf of Trinity College welcomes the drive to see Greater Nottinghamshire become 'carbon neutral', as is the commitment of all partner authorities to meet this goal significantly before the 2050 target established by central government.

Boyer on behalf of

- **Mr Stubbs and Mr Whittington**
- **Mr David Herrick**
- **Michael Machin, Gaintaime Limited, Wheatcroft Farm Limited and John A Wells Limited**
- **Strawsons Group Investments Ltd**
- **Harworth Group**

agree that climate change is a key issue that will need to be addressed irrespective of the growth strategy selected. The issue primarily affects the form that development takes and will be addressed through appropriate planning policies and changes to the Building Regulations.

Fisher German LLP on behalf of

- **Joanna Sztejer**
- **Mr Malcolm Hodgkinson**

note that ahead of the ban on sales of high emission vehicles in 2035, locating development adjacent to sustainable urban areas negates the need for daily travel to access higher order services. The land to the west of Hucknall is a sustainable location for new development. It is in close proximity to various services and facilities which would reasonably meet the day to day needs of residents and could provide the opportunity to deliver new services and facilities which would benefit both new and existing residents.

Fisher German on behalf of Samworth Farms Limited suggest that development should be located where it can take advantage of high-quality public transport or where the need to travel is reduced by delivery of

development in close proximity to services, facilities and employment opportunities. Sites such as the land to the east of Radcliffe on Trent offer such opportunities.

Fisher German on behalf of Taylor Wimpey suggest that development should be located where it can take advantage of high-quality public transport or where the need to travel is reduced by delivery of development in close proximity to services, facilities and employment opportunities. On this basis, sites such as northeast of Toton/Chilwell Lane, Bramcote, are considered to be optimally located to reduce the need to travel.

Fisher German on behalf of the Trustees of the Locko 1991 Settlement suggest locating development where it can take advantage of high-quality public transport or where the need to travel is reduced by delivery of development in close proximity to services, facilities and employment opportunities. On this basis, sites such as that adjacent to Spondon and Oakwood (in Erewash) are considered to be optimally located to reduce the need to travel.

Geoff Prince Associates on behalf of both Langridge Homes Limited and Hammond Farms suggests setting out policies to encourage renewable energy projects; designing and building houses which minimize energy use and rely on on-site renewable solutions such as solar panels on roofs, air and ground source heat pumps etc.; providing EV charging points for each new dwelling as well as in car parks such as at park and ride sites; ensuring that sufficient electricity capacity is not only available, but sourced from renewable sources to meet future demand, which is likely to increase as we switch to using electric vehicles; creating integrated new communities where people live, work and play to reduce the need for travel and providing greater opportunities for cycling and walking – including use of E Bikes and E scooters; and extending the LRT network particularly in Gedling where there is currently no provision unlike Nottingham City, Broxtowe and in Rushcliffe.

Gladman encourage sustainable housing developments to mitigate against climate change. Gladman encourages that any updates on technological or policy responses to climate change be centred around the three pillars of sustainability (economic, social, environmental) so as to create balanced and reliable solutions.

JW Planning Ltd (also on behalf of Hall Construction Services Ltd) is of the view that the development strategy for urban area and key settlements needs to comprise environmentally responsible development which addresses climate change in order to minimise its impacts, through locating development which has access to sustainable transport, low risks of flooding, use of appropriate means of construction and promoting the use of low carbon technologies.

Oxalis on behalf of Richard Taylor notes that the Growth Options states: “the Plan will ensure that new development is sustainable, at the same time as addressing climate change, and in particular, helping to ensure the

transition of the area towards becoming 'Carbon Neutral' over the Plan period" (paragraph 2.2). Whilst the site and other general ambitions of the strategy are supported it is the landowners view that it is inappropriate to seek to determine a strategy based on a single defined 'growth option'.

Oxalis on behalf of un-named landowners and developers and also on behalf of Bloor Homes Ltd note that, in respect of climate change, the adopted strategy can and should accord with the Greater Nottingham (GN) Authorities ambition to make a step change towards being carbon neutral during the plan period by prioritising the development of sites which are, or can be made, sustainable through on site provisions and off-site accessibility. These factors should have significant weight in the consideration of the overall strategy by the GN Authorities.

Oxalis on behalf of the South West Nottingham Consortium consider that it is entirely appropriate for the strategy for the growth of Greater Nottingham to focus on development schemes that can help bring about ambitions of delivering a carbon neutral future. There are many ways of helping to achieve this, but the sustainability of transport, and integration of homes and jobs is a critical component.

Oxalis on behalf of John A Wells Ltd haven't commented specifically on this question but note that the strategy could include new settlements, urban extensions, or smaller scale development in villages or, most likely, a combination of all. Given the tightly drawn Green Belt boundary around Greater Nottingham, this would almost certainly mean the development of land currently identified as Green Belt if the most sustainable development strategy is to be taken forward

Pegasus on behalf of Hallam Land Management comment that addressing climate change, with the aim to become carbon neutral by 2050, should be a key component of the Growth Strategy. Strategic development proposals that are able to contribute significantly to meeting this objective should be preferred.

Persimmon Homes suggest Councils ought not to pursue climate change policies affecting housing which exceed those currently subject to consultation through the governments 'Future Homes Standard'. A policy which seeks to drive standards above those currently subject to consultation will likely impact the viability of schemes, thus the plans deliverability.

Ridge and Partners LLP on behalf of Barwood Land suggest that development be located close to existing urban areas, such as at Middlebeck Farm, close to the centre of Arnold with sustainable modes of transport providing access to Nottingham City Centre. This reduces the need for additional strategic infrastructure and allows development to use existing sustainable modes of transport and reduce travel distances. There is in principle support for this aspiration, with the acknowledgement that the emerging growth strategy is not limited as a result. We support SUE and development locations being designated adjacent existing urban areas, to assist in reducing the amount of resources and additional infrastructure

required for construction, minimise travel distances and encouraging sustainable travel patterns and modes.

Savills on behalf of

- **Taylor Wimpey (Land West of Ruddington)**
- **Taylor Wimpey (Land North West of East Bridgford)**
- **Taylor Wimpey (Land East of Gamston)**

In respect of achieving carbon neutrality this should ideally take a lead from the national level so that there is consistency across plan-making but also for this to be taken into consideration in the evidence base in terms of infrastructure costs and development viability.

Savills on behalf of

- **Wilson Bowden Developments (Land at New Farm, Nuthall)**
- **Wilson Bowden Developments (Land West of Woodhouse Way)**

recognise that any future strategic plan will need to take account of climate change. Where strategies and policies are proposed, a fully evidenced approach should be taken to the introduction of new policy requirements and that these emerging/ new policies reflect the prevailing Building Regulations. Where new targets are to be set e.g. achieving carbon neutral, then these should be phased and appropriate account should be taken of the potential financial implications. The changes proposed and the financial implications should be fed into infrastructure delivery plans and viability appraisals used to support the plan. In respect of achieving carbon neutrality this should ideally take a lead from the national level so that there is consistency across plan-making but also for this to be taken into consideration in the evidence base in terms of infrastructure costs and development viability.

Stantec on behalf of Barwood Land support the principle of this aspiration with the acknowledgement that the emerging growth strategy is not limited as a result. They support SUE and development locations being designated adjacent to existing urban areas, to assist in reducing the amount of resources and strategic infrastructure required for construction, minimising travel distances and encouraging sustainable travel patterns and modes.

Turley on behalf of IM Land recognise that responding to the challenge faced by climate change is a fundamental aim of the GNSP. New development should be directed to sustainable settlements to enhance facilities, minimise outward journeys and maximise opportunities for internal trips to be undertaken by sustainable means.

Appropriate new development around the existing settlements can deliver new infrastructure to meet existing, as well as new demand. IM Land are promoting a strategic site west of Cotgrave for up to 220 dwellings and a new 1FE primary school. This will help address existing capacity constraints in a highly sustainable location to limit outward trips from the village.

Uniper UK Ltd fully supports policies that make a step change towards achieving carbon neutrality in areas where they operate. They have aspirations and objectives for redevelopment of the Ratcliffe Power Station

site. Also, mixed use residential opportunities adjoining the Ratcliffe Power Station site offer increased scope to address climate change.

WSP on behalf of Global Mutual support the drive for carbon neutrality in the plan, in principle, but a balance is needed to ensure emerging policies do not become onerous and deter investors or visitors to the City. Focusing development activity in the City Centre / Town Centres promotes the most sustainable commuting and shopping patterns, minimising the trip lengths and the need to travel by car. Town centre uses should be strongly resisted outside of centres, to avoid unsustainable movement patterns and diverting spending from the Nottingham City Centre economy.

Summarised comments from other organisations

Burton Joyce Climate Change Action Group propose a range of measures to tackle climate change. Building all new homes to at least Passivhaus standard, investing in better public transport, generating low carbon sources of energy e.g., solar, wind, use of heat pumps, stopping the paving over of land, use of natural flood defences, not developing land on flood plains, making sure all houses not only can be heated but also stay cool in hot weather. Tree planting and also leaving areas of permanent grass land and meadow.

Carlton and Gedling U3A consider that this can be achieved by refusing planning permissions in areas threatened by flooding due to the increasing incidence of extreme weather events concerns with the Teal Close development and within the Trent flood plain. Also by attaching carbon neutral and/or energy saving conditions to new planning consents

Kase Aero Ltd suggest that the tram network be developed to Nottingham from Edwalton/Tollerton area using the line of the old Central Railway line.

Keyworth Conservation Area Advisory Group suggest that, post Covid, councils should co-ordinate and increase provision of NET, public transport, provide car free areas in the city centre and promote walking and cycling routes across the Greater Nottingham area.

Home Builders Federation (HBF) noted that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent Councils from stipulating energy performance standards that exceed the Building Regulations but consider that the Councils should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of every Council setting out its own approach to energy efficiency, which undermines economies of scale for manufacturers, suppliers and developers.

Nottinghamshire Campaign to Protect Rural England suggest this can be achieved by, among other measures, maximising the ability of our landscapes to capture carbon through natural processes, adopting a truly

'brownfield first' policy and following a clear hierarchy for all future transport investment.

Nottingham Green Party consider that all developments should be required to have an independent environmental impact assessment and demonstrate that it will, over the course of its life, lead to a significant reduction in CO2 emission and a significant increase in bio diversity. This assessment should include the period of development plus the lifetime of the development once completed.

Notts Wildlife Trust note that the natural environment provides 'ecosystem services', many of which help mitigate climate change, so protecting all our existing natural capital and looking to increase it is fundamental to any sensible Climate Change policies.

Nottingham Local Access Forum comments that this can be achieved by focussing on active travel and sustainable public transport and making open spaces pleasant and accessible.

Nottingham Open Spaces Forum suggest that all development should be carbon positive or carbon neutral. The need for increased private transport should be avoided.

Nottinghamshire Ramblers suggest that the focus should be on active travel and sustainable public transport and making its open spaces pleasant and accessible for people and wildlife.

Pedals (Nottingham Cycling Campaign) comment that this can be achieved by focusing on active travel and sustainable public transport and making its open spaces pleasant and accessible.

Positive Homes Ltd note that only 1% of all the homes built in England since 2008 are to the highest A EPC rating so 99% of everything being built today will need retrofitting to help the country become net zero. This really is unacceptable - and simply fixed by inserting a planning condition into every approval, and a sentence into every new local plan.

RBC Leake Ward Members request that the plan sets the highest possible energy standards for new homes and repurposed buildings, improving on government imposed minima if possible. Adopt any new standards as soon as possible. Include clauses in outline planning permissions to ensure that if national standards change before reserved matters are submitted, developers have to include the latest specifications.

Summarised comments from local residents

Several residents reiterated or supported the comments made by the five parishes of Gotham Ward.

Transport

Many of the comments from local residents referred to transport issues, suggesting that achieving carbon neutrality will require reducing overall car use by promoting affordable public transport, walking and cycling and by reducing the need to travel. More detailed suggestions included the need to improve pedestrian and cycling infrastructure (including the use of the latter to connect rural settlements), support for the further expansion of the NET tram network, the need to encourage the move to electric vehicles. In relation to the design of new development, it was suggested that cycling and walking should be given priority over than the needs of the car, developers should be encouraged to include solar panels and charging points for electric vehicles and new developments should be provided with an electric bike to reduce car use for local journeys.

Flooding

A number of local residents raised issues relating to flooding and drainage, in particular to express concern regarding new development in the flood plain. It was suggested that developers be required to model risk not only in relation to their development sites but also the surrounded area. Development on floodplains require water channels to be diverted from their current flow, damaging existing water tables and creating unforeseen issues. It was suggested that new development utilises SUDS to minimise the impact of rainwater runoff. However, sustainable drainage systems within new developments need to be encouraged and adopted by Local Authorities not merely passed on to maintenance companies like they would adopt standard drainage systems. It was also suggested that there should be greater investment in water energy projects along the Trent.

Location of new development

Many responses suggested the location of new development would increase carbon neutrality if concentrated around existing infrastructure, i.e. public transport hubs (including trains and trams), employment, commercial areas, amenities and leisure. Locating new developments closer to town would reduce commuting traffic and pollution, as would encouraging home working and converting offices into housing. (It was noted that working from home would require high performance and affordable communications infrastructure). Similarly, these benefits would be achieved through the regeneration of the existing housing stock which could best be achieved best through an Urban Intensification Growth Strategy. Improvements to public transport within existing urban areas should also be encouraged. Specific mention was made of the need to minimise the amount of new development and to build on brown field sites.

Mechanisms

Some comments focussed on the mechanisms for addressing climate change. Suggestions included the need for joined up forward thinking by all local authorities, the greater use of parish and community councils to drive

environmental ideas forward and the need to enforce the toughest environmental standards. Several mentioned the application of national guidelines to ensure consistency across plan-making. It was suggested that councils should lead on developments, subsidise that which they wish to encourage and make it convenient to do the right thing.

Delivery of new development

Many suggestions were made as to how new development could achieve carbon neutrality. Some suggested that all new development should be carbon positive or carbon neutral, and the subject of an independent environmental impact assessment to demonstrate that it will, over the course of its life, lead to a significant reduction in CO₂ emission and a significant increase in biodiversity. The impact of these measures on the viability of new development was noted.

Some comments focussed on the construction of new buildings, suggesting that a higher standard of house building be required to reduce carbon through increased insulation levels, passive house building techniques and renewable energy use. These requirements could be implemented by planning condition or via the building regulations. Some suggested that all new buildings (including houses, shops and offices) should be required to have solar panels with battery storage fitted unless there is an overriding reason why this cannot be done, alternatively ground or air source heat pumps. As far as possible ensure that new houses should be built on an orientation that maximises solar electricity generation. The importance of making sure all houses not only can be heated but also stay cool in hot weather was acknowledged.

Reference was also made to the need to also consider existing buildings, including encouraging more energy conservation by means such as home insulation.

The importance of recycling was noted, including the need to provide adequate recycling facilities including accessible and not oversubscribed recycling centres and refuse collection to promote the correct disposal of waste.

Other comments focussed on the natural environment, encouraging additional green spaces and rewilding. Several residents promoted additional tree planting, suggesting that developers could plant a tree for each new house or plant an equal area of woodland to paved area within any development. Other suggestions were to develop around lakes, provide rooftop gardens, provide more parks/allotments, provide insect friendly zones, require that at least 20% of space is allocated to wild green space and to create forested areas across the county that link up and allow wildlife to flourish.

In terms of transport issues relating to new development, it was suggested the park and ride/cycle facilities could be incorporated. It was suggested that all new houses should include electric vehicle charging points, and

some were of the view that only electric cars should be allowed on new development. To promote walking and cycling, it was suggested that new development should include wide pavements and cycle lanes.

Site specific comments

Some site specific comments were made, in particular to express that the development of certain sites included in the Growth Options Study would not be compatible with achieving carbon neutrality, due to the loss of agricultural land (for example the R17 site), the removal of existing renewable energy facilities or development in more isolated locations resulting in the increased reliance on private cars. Specific reference was made to the development of the EMERGE incinerator proposed by Uniper at the Ratcliffe on Soar power station site.

Other

Taking the standard methodology into account the statistics already show that Rushcliffe is and will be building to an overestimate, this is even before the pandemic has been taken into account. The Amount of New Housing being suggested for the Ruddington Area is far greater than the standard methodology calculates for an area of this size.

Green Belt and green field sites

There was strong support for the preservation of the Green Belt and green field sites to mitigate climate change. The role of green spaces (including woodland, grassland, meadow, wildlife and habitat) in absorbing CO₂ was recognised as well as reducing flood risk by providing a natural soakaway. On an associated point, several suggested that new development should be supported by additional tree planting and that the area of woodland in the County should be increased, particularly on high ground.

Renewable energy

Several comments made specific reference to renewable energy. It was noted that carbon neutrality can only be achieved through large-scale off-setting and use of renewable energy tariffs. It was suggested that all developments should incorporate renewable energy where appropriate, such as solar panels, heat source pumps. The potential to tap into existing heat sources was noted, such as waste heat from incinerators. Reference was made to the addition of solar panels to existing buildings. Specific mention was made to the need to allow greater flexibility in allowing wind turbines in the green belt, particularly with regard to farms. It was suggested that more intensive 'vertical farms' should be allowed, which take up less acreage, but then require 'saved' land to be used for natural habitats or woodland use.

6. **Question OS6: Amount of New Housing**

What, if any, factors (that can be evidenced) justify planning for more or fewer new homes than the standard methodology suggests?

Summarised comments from statutory organisations

Amber Valley Borough Council commented the proposed HS2 Hub Station at Toton can be expected to boost the need for both housing and economic development within the Strategic Plan area and could be a justification to plan for a higher level of housing growth than the standard methodology indicates, although given the extensive area of land within the Plan area, outside the existing main urban areas and villages, that is within the Green Belt, it may be difficult to achieve such higher growth.

Aslockton Parish Council commented that additional housing development should be orientated on the changing needs of a falling but ageing population. Improving and adapting existing housing stock would in most cases be more sustainable if all factors are considered than building new.

The Parish Councils of Barton in Fabis, Gotham, Ratcliffe on Soar and Thrumpton commented that the standard methodology provides the basis for a starting assumption. Any increase in that number above the standard methodology should be properly justified and the apparent pre-judgement that this is a "minimum" figure as stated in 4.11 needs to be established by objective evidence. The plan should propose a viable weighting of factors such as impact on the wider environment and impact on key criteria including impact on the Green Belt and climate change and weight this against any benefits of the proposed housing numbers at a strategic level and at an individual site basis.

Burton Joyce Parish Council commented that they are not aware of any, other than for the type of housing where there is a clear and unfulfilled requirement for first homes, and "downsizing" or bungalow homes

Calverton Parish Council commented that There are significant constraints across the development plan area that justify a lower minimum housing figure than that determined through the standard methodology. It would be unreasonable for further Green Belt releases to now be mandated through this plan process. Every plan period has permitted the degradation of heritage and environmental assets in order to allocate sufficient housing for the objectively identified housing need. Heritage assets are finite and environmental assets are usually of location-specific value. Additional housing cannot be accommodated within Calverton and this would be contrary to Gedling's carbon neutral targets.

Chetwynd: The Toton and Chilwell Neighbourhood Forum commented that the proposed East Midlands Hub Station and associated employment opportunities would suggest that more homes are required in the Area surrounding them than would be proposed by the standard methodology. The development here will be significant enough to require a different

algorithm to calculate local housing. We should aim to minimise commuting using the slogan 'live local, work local, shop local'.

Derbyshire County Council commented that the Opinion Research Services study emphasised that it is important for Erewash Borough to form an integral part of any consideration of future housing requirements for the Greater Nottingham area. It is also important, through the Duty to Cooperate, for EBC to engage effectively with the Derby HMA authorities to consider housing needs within the Derby HMA. HS2 and the proposed station hub at Toton and other supporting new infrastructure such as the NET extension to Toton are considered to be an important factor that would need to be taken into account in assessing the possibility of planning for a higher housing requirement in Greater Nottingham.

Granby cum Sutton Parish Council commented that due to the long-term economic impact of Covid-19, some of the key assumptions which underpin the Plan will likely need to be reviewed and revised.

Kingston-on-Soar Parish Council commented that any increase in that number should be properly justified and the apparent pre-judgement that this is a "minimum" figure as stated in 4.11 needs to be established by objective evidence. The plan should propose a viable weighting of factors such as impact on the wider environment and impact on key criteria including impact on the Green Belt and climate change and weight this against any benefits of the proposed housing numbers at a strategic level and at an individual site basis.

Holme Pierrepont and Gamston Parish Council commented that Rushcliffe BC has the highest housing target outside Nottingham city. With the current commitments and allocations, they see no reason for significant sites to be identified until these are fully brought forward. Allocations are more likely to be implemented on small to medium sized projects where infrastructure is less of a hurdle.

Linby Parish Council commented that 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. They would expect to see less demand for privately owned housing and more for rented accommodation. 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.

Nottinghamshire County Council commented that there is potential multi-use of space. If shared community use and co-location of services is a Development Consideration. Please consider One Public Estate. 'A Home for the Ages' challenges the current failure in England to meet the need for housing that is suitable for the older generation. There is currently a failure to build enough of all forms of age-friendly housing. Developer funding for the

provision of local bus services and bus stop facilities will be required to support a vibrant and sustainable community.

Papplewick Parish Council commented that housing studies were commissioned in 2020 for 15-20 years. An unknown factor is if the changes brought by Covid-19 will be long term, if so housing and working needs will change e.g. fewer offices.

Radcliffe on Trent Parish Council commented that Radcliffe on Trent has already provided considerably more houses than originally required by Rushcliffe Borough Council so no factors can justify more houses being built there.

Ravenshead Parish Council commented that whilst the projections for the GNSP are somewhat more realistic than the ACS they will inevitably inherit a backlog from the ACS which will render them unobtainable.

Ruddington Parish Council commented that taking the standard methodology into account the statistics already show that Rushcliffe is and will be building to an overestimate, this is even before the pandemic has been taken into account. Covid-19 has to have an enormous impact and impact statement needs to be completed. In turn I feel this should dramatically drop the numbers to be in line with the standard methodology or some ways beneath it. The Amount of New Housing being suggested for the Ruddington Area is far greater than the standard methodology calculates for an area of this size. The suggested sites equate to a far larger number than is required.

- The total number proposed for Ruddington would be around 4000 new homes which is an increase of 107% on the total committed to 2028 of 3734
- This is a substantial figure when taken into consideration that in the Rushcliffe Borough Council's Local Plan, Ruddington could sustain approximately 3671 houses with the current infrastructure.
- Increasing the infrastructure of Ruddington centre with schools, doctors, transport and other essential amenities is not viable due to the size of the Village centre.

Therefore, if a site or sites cannot sustain additional new housing then this justifies planning for fewer new homes than the standard methodology suggests.

Saxondale Parish Meeting commented that within the immediate area, a vast number of new housing has been developed and more planned which already exceeds transport growth. Therefore, there is no justification in developing any further new housing in this area.

Summarised comments from developers

Andrew Hiorns on behalf of Parker Strategic Land commented that the Standard Methodology provides a nationally recognised standard approach designed to avoid prolonged debate about the derivation of the requirements and in this we support its introduction. There may be potential through Neighbourhood Plans for instance, to increase the amount of provision in smaller communities to meet specific needs such as affordable housing, such as on exception sites, where particular local needs are identified through local housing needs studies.

Barratt / David Wilson Homes: The overall figure of 59, 420 should be treated as a 'minimum', planned for and delivered accordingly. This will be higher when the 'Hucknall' component of Greater Nottingham is added. There is good reason to maximise the area's economic potential and planned investment in infrastructure and, as such, provide an even greater number of houses. Notwithstanding Green Belt Policy and Environmental Designations, there are no overriding environmental constraints justifying a lower figure.

Barwood Land commented that The GNSP sets out that it proposes to use the Standard Methodology for its housing figures. There appears to be no reason for proposing a lower figure than this. It must be noted that in line with the NPPF and specifically paragraph 59 that this must be considered a minimum figure. This is essential to enable plans to provide for arising future growth. The current standard method for Gedling Borough proposes 436 dwellings per annum, with the proposed draft standard method increasing this to 534 dwellings per annum (an increase of 22.4%). Between April 2011 and April 2019 only 64% of the current housing target had been delivered, as is set out in the Gedling Housing Delivery Action Plan 2019. As a result, it is imperative that the forthcoming GNSP allocates enough land for housing and ensures that sites are truly deliverable to meet current and future housing needs in the Borough.

Bidwells on behalf of Trinity College commented that in principle, it is appropriate to use the standard methodology for calculating housing need. However, it is noted that the Housing White Paper provided a proposed update to the standard method used for calculating housing need. The Government's objective of significantly boosting the supply of homes set out in both the 2017 and 2020 Housing White Papers respectively, the current 'build, build, build' message, and the fact that Government confirmed that the 2016-based household projections did not provide an appropriate basis for the standard method, further re-enforce that 534 should be treated as the minimum figure that Gedling Borough should deliver. There are occasions in which there is a need to go beyond the identified figure. Neighbouring authorities should be consulted as part of the Duty to Cooperate on this issue. It is also noted that Gedling Borough Council have under delivered against the adopted housing requirement in the past three years. This suggests that there is a need to increase the number of homes that are identified for allocation as part of the Local Plan process to ensure that this housing need is met in the

future and that there is flexibility in place to respond to changing circumstances. The plan will realistically need to plan for 10-20% additional growth above the 534 figure to ensure the minimum need is met (subject to the nature of the proposed strategy and the risk to the delivery of allocated sites).

Boyer Planning on behalf of Harworth Group, Gaintame, Stubbs and Whittington and Strawsons commented that the new Standard Method significantly increases the housing requirement for the Greater Nottinghamshire area to 3,319 p.a. or 66,380 for the 20-year plan period of the GNSP. This should be treated as a minimum and the option of going higher than this should be explored. The consultation document refers to an estimated supply of 61,953. However, this figure includes SHLAA sites without planning status and allocations with potential additional capacity. These should not be included as confirmed supply. Evidence not robust. It also includes supply post 2038 which is not appropriate. This should not be included. Need to take into account past completions on a consistent basis. Consider the Plan evidence base must set out a baseline housing supply for the Plan area drawn from the Annual Monitoring Reports of the constituent authorities. Otherwise, it is difficult to make judgements about the scale of the task to identify housing supply to meet housing need through the GNSP process. The lack of this information is a major omission that should be addressed before the next consultation stage of the GNSP. The Councils need to be realistic in delivery assumptions on strategic sites. Need for identification of a range of sites in scale in order to meet planned delivery, and inclusion of safeguarded land adjacent to such areas to allow for flexibility.

There are significant concerns about housing supply in Gedling. Of the non-strategic sites only 19 of the 30 sites have been identified as having no identified issues affecting their delivery with at least 6 sites having been assessed as making no to little progress. Rather than delivering the housing requirement through the provision of a small number of large scale strategic sites, a larger number and variety of strategic scale sites, including new settlements should be allocated, such as the site at Forest Farm Papplewick.

There is substantial and significant shortfall in Broxtowe (see 2017/18 SHLAA). The significant delays and under-provision that characterise the ACSs must be an issue at the forefront of site selection in this GNSP. Concerned that the Growth Options study focusses on defining strategic growth areas capable of accommodating 1,000 homes and we consider this threshold to be too high. On the basis of our analysis of housing supply and delivery above, we consider that smaller growth areas and sites must be considered.

Carter Jonas on behalf of Burhill Group: The spatial objectives of 'providing the right types of homes' and optimising opportunities to increase the number of new homes is in accordance with the Government's objective of significantly boosting the supply of homes as set out at paragraph 59 of the NPPF and this is supported. However, given the recent HDT (January 2021)

measurement for Gedling Borough Council ('Gedling') was just 68%, the Plan needs to ensure that the chosen strategy allows Gedling to deliver the Government's housing target of 458 dwellings per annum ('dpa'). In terms of factors which justifies more homes than the current standard method requires, it is imperative that each of the Councils continue to review their housing need requirements and Green Belt boundaries to ensure their full objectively assessed housing needs ('OAHN') are met. In Gedling, sufficient land to meet the latest published household projections (an increase of 3,759 households (7.3%) between 2018 to 2028) needs to be delivered / allocated.

Define on behalf of Bloor Homes commented that a flexible contingency of 20% (as per the Local Plan Advisory Group's recommendation) should be applied to the overall housing land supply to ensure that the Local Housing need is recognised and treated as a minimum rather than a maximum figure. That will also ensure that the GNSP is "sufficiently flexible to respond to rapid change" (NPPF para. 11) should any part of the planned housing land supply be delayed or fail to deliver all together. Moreover, whilst the potential role and benefits of significant strategic allocations in realising strategic growth is recognised, such developments are by their very nature be extremely complicated proposals to deliver and the GNSP must, therefore, take a realistic view of the timescales for their delivery (taking account of key issues such as land ownership) and allocate additional land to address needs in the interim if needs be. Indeed, as the NPPF highlights (para. 68) "small and medium sites can make an important contribution to meeting the housing requirement.

The Hill Family commented that in light of the proposed revised standard method contained within the Government's Changes to the Current Planning System consultation, the Strategic Plan will need to identify additional housing land, over and above, the development requirements contained within the current Growth Options document.

Hollins Strategic Land comment that affordability issues in Rushcliffe, particularly in rural areas, must be a critical priority for the Plan to help address by allocating sites. Other factors include minimising out-migration and maximising job growth is not undermined by lack of housing growth

FH Farms stated that the new Standard Method should be starting point for number of new homes planned for. It is imperative that moving forward, this level of growth is set as the minimum level of new homes to be provided.

Fisher German on behalf of Samworth Farms and The Trustees of the Locko 1991 Settlement commented that the amount of housing which the Plan should deliver should, as a starting point, have due regard for the standard methodology for calculating housing need. There is no robust justification to reduce housing need below the level established by the updated Standard Methodology. To ensure flexibility and delivery, the Council's should seek to allocate land to deliver 15% above the established Housing Requirement. Given this Plan is predominantly looking to the period

beyond the current Core Strategy, there should be sufficient time to ensure allocated sites can begin delivery prior to 2028. Such sites can also respond to any increases in housing need in the intervening years, for example due to revisions to the standard methodology.

Geoffrey Prince Associates Ltd on behalf of Hammond Farms and Landridge Homes commented that this question has effectively been superseded by the Planning White Paper, which indicates that in the future housing requirements will be set by government for each local authority area/housing market area based on the standard methodology with the aim of increasing the rate of house-building across the country. For the Greater Nottingham Area (GNA) the initial indications are that the rate of house-building will need to increase substantially over and above currently adopted housing requirements. If these changes become part of national policy, then it will have significant implications for the Plan in terms of the spatial distribution of development and land use planning in the GNA. Specifically, it will mean the release of a significant amount of Green Belt land on sites adjoining the edge of the main urban area, around key settlements and other villages, and at other locations along transport corridors/at transport hubs. This in turn will impact on transport infrastructure priorities and investment (roads and public transport) as well as the location of new employment sites. Such a strategy will enable new neighbourhoods and communities to be created which respond to people's lifestyle aspirations. In addition, some existing strategic allocations will need to be reviewed and those that are not delivering such as Top Wighay north of Hucknall should be replaced with strategic growth options which can clearly demonstrate that they can be delivered within the plan period.

Gladman: The GNPP should be mindful of the changes to the Standard Method and its impact on the preparation of the Greater Nottingham Strategic Plan. The PPG is clear that the standard methodology identifies the minimum annual housing need figure and does not establish a housing requirement figure. Ambitions to support economic growth, deliver affordable housing and unmet needs from other authorities should be taken into consideration during the Plan preparation process.

The plan should ensure that the proposed housing growth enables and aligns with the region's economic growth aspirations surrounding key employment sites such as the East Midlands Airport, Universities, Toton and Ratcliffe-on-Soar Power Station. Additionally, it is vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally. Due to the reasons outlined, Gladman supports the HBF's recommendation that local plan should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply

Jelson Homes and the Wheatcroft Family comment that Appendix 1 figures suggest that the Councils might already be able to demonstrate a supply sufficient to meet its needs. However, note that the headroom is marginal (i.e.

only around 2,000 homes). On this basis, the consultation document rightly assumes that it will be necessary to identify new sites for development. Strongly advise that Rushcliffe's supply figure is treated with caution. The figure relies heavily on the delivery of houses from several sustainable urban extensions and SUEs are notoriously complex and bring with them many challenges. Authorities may not be able to meet their needs and Rushcliffe may have to accept some of this unmet need. This is a logical approach given the sustainability of settlements within Rushcliffe (i.e. Radcliffe on Trent with its train station and good amenities). Whichever method is used to calculate housing needs; the Councils will need to identify new strategic sites for development. It is relevant to note that there is recent precedent for allocating land for more homes than the standard methodology suggests (e.g. South Oxfordshire Local Plan).

JVH on behalf of Evelyn Shepperson state that the figure set out at para 2.24 of 59,420 homes is the standard method applied to the plan area. The government has recently issued consultation papers advising on the changes to the standard methodology which will increase the housing requirement. The plan should clearly proceed on the latest methodology. If the authorities are planning for growth, including economic growth then there is justification for an uplift to the current standard methodology to take account of employment and economic growth. The plan as drafted does not appear to plan for this and the opportunities associated with HS2 and other infrastructure projects mean that there is an opportunity for increase economic activity and hence justification to increase the housing requirement due to economic uplift. Growth strategies are expressly mentioned in the PPG as one of the circumstances where additional homes over the base position can and should be planned for.

JW Planning Ltd commented that the development strategy, in continuing to recognise the housing and economic needs of both the Nottingham urban area and those identified key settlements outside this area, needs to comprise environmentally responsible development which addresses climate change in order to minimise its impacts, through locating development which has access to sustainable transport, low risks of flooding, use of appropriate means of construction and promoting the use of low carbon technologies.

JW Planning Ltd on behalf of Hall Construction Services Ltd commented the Coronavirus crisis represents the exceptional circumstances required to depart from the standard methodology of predicting levels of future housing required, as advocated in para 60 of the NPPF, in order to address the reduction in housing supply and, with housebuilding recognised as a key economic driver, to help stimulate the economy.

Marrons Planning on behalf of Crofts Developments, Davidson Development, Harris Land, Mather Jamie Ltd and Whitefields Farm commented that the minimum number of homes needed is driven by a local housing need assessment conducted using the standard method (Paragraph 60 NPPF). The document notes that 59,420 homes are required for Greater

Nottingham between 2018 and 2038 (51,580 without Erewash Borough) and considers that current identified supply is capable of meeting this figure (Paragraph 2.24). However, Appendix 1 confirms that the supply figure is 'based on Local Plans and SHLAAs' and in this respect it might be more appropriate to recognise that the availability of land is sufficient to meet the housing need; with a need to release land through the development plan before it can properly be considered as deliverable or developable supply. The proposed standard housing method figures for the strategic plan area result in a requirement for an additional 396 homes a year (increase from 2,579 to 2,975 homes) and an additional 7,920 homes (increase from 51,580 to 59,500 homes) during the plan period in the strategic plan area.

Nexus Planning on behalf of CEG Land Promotions I (UK) Ltd

commented that CEG is not aware of any evidence which demonstrates that exceptional circumstances exist for a lower figure than the Standard Methodology minimum. CEG are of the view that a contingency buffer of at least 10% should be incorporated into the final GNSP housing requirement figures. There is a meaningful 15% increase to the overall GNSP minimum housing figure under the revised Standard Methodology. In respect of Rushcliffe, due consideration should be given to the level of additional housing need and economic growth that will arise within the A46 Corridor over the GNSP period as a result of the A46 Corridor strategic infrastructure commitments. Upward adjustments to the Standard Methodology minimum figures should be applied where necessary to support economic growth over the GNSP period. Expect the GNSP spatial growth strategy in due course will need to take into account the revised overall Standard Methodology figure and the corresponding local council minimum figures.

Nineteen47 on behalf of Richborough Estates commented that existing affordability issues are exacerbated by past reliance on large-scale sites with long lead-in times, and a resultant stepped trajectory in housing delivery. The consultation paper identifies a need for 59,420 net additional dwellings over the period 2018 to 2038, equating to 2,971 dwellings per annum. In comparison, for the period 2020 to 2038 and excluding Ashfield, the Greater Nottingham and Ashfield Housing Needs Assessment shows a net requirement for 2,378 additional social/affordable rented dwellings per annum, which equates to 80% of the total annual housing requirement. The most effective way to increase the delivery of affordable housing is to increase the delivery of housing overall, whilst retaining the viability of individual developments through ensuring they are not overburdened with planning obligations.

Oxalis Planning on behalf of Bloor Homes, John A Wells Ltd, South West Nottingham Consortium and W Westerman Ltd commented that the September 2020 Greater Nottingham & Ashfield Housing Needs Assessment evidence base document states there is an affordable housing need for 2,107 dwellings per annum across the Greater Nottingham Plan area. Oxalis comment that given this there is likely to be justification for a significant uplift

of the housing requirement above the minimum standard methodology requirement's emerging Strategic Plan should both recognise the failures of the past and be sufficiently bold to put in place a strategy to deliver the Government's policies. This includes planning for growth in an ambitious and positive way, including sufficient flexibility to ensure minimum growth requirements are met. Growth Options Document acknowledges that there is continuing shortfall of housing completions across the Greater Nottingham Authorities of 2,883 homes against the Nottingham HMA target from 2011-19.

The emerging Strategic Plan should both recognise the failures of the past and be sufficiently bold to put in place a strategy to deliver the Government policies. This includes planning for growth in an ambitious and positive way, including sufficient flexibility to ensure minimum growth requirements are met. The GN Authorities have struggled historically to deliver their housing requirements and have only met their cumulative housing needs in two years since 2011, resulting in a 2,883 homes shortfall developing over the past eight years. The GN Authorities have collectively and consistently overestimated delivery on sites, and failed to recognise that some sites would, for whatever reason, stall. The growth strategy therefore must make sure there is flexibility to ensure delivery – this means more sites, including smaller sites, and planning early and comprehensively for strategic sites. This could include new settlements, urban extensions, or smaller scale development in villages or, most likely, a combination of all. Given the tightly drawn Green Belt boundary around Greater Nottingham, this would almost certainly mean the development of land currently identified as Green Belt if the most sustainable development strategy is to be taken forward.

Pegasus Group on behalf of Hallam Land Management commented that the Strategic Growth Plan should identify sufficient strategic sites and requirements for subsequent local plans to ensure that at least the housing need identified by the standard methodology is built within the plan period. It is not considered that there are any exceptional circumstances to justify an alternative approach, or a reduced number. It is not expected that there will be a need to either export or import housing numbers. This will of course need to be clearly established through the Duty to Cooperate and the signing of a Statement of Common Ground. In addition to the number advised by the standard method, the Plan requirement must provide an additional buffer to ensure the identified housing needs will be built within the plan period. Using the new methodology, over the plan period the requirement for the Strategic Plan is 59,500 dwellings, an increase of 7,920 dwellings from the current standard method figure 2018-38. The Strategic Plan will therefore need to acknowledge the changes to the standard method and raise the housing requirements in line with the new methodology, once this has been finalised by government. The housing requirement for Rushcliffe has significantly increased by over 9,000 dwellings over the proposed plan period. This is important as to deliver sustainable patterns of growth, a key objective of the Strategic Plan should be to seek to meet the housing need where it arises, i.e.

for each local authority to meet its own needs, unless this is not possible or it would result in unsustainable patterns of growth.

The Pegasus Group commented that whilst it is noted that circumstances may change as the August 2020 White Paper progresses, the Strategic Plan should acknowledge the changes to the standard method and raise the housing requirements in line with the new methodology. The Strategic Plan should ensure enough housing is directed towards those Local Authority areas to meet the updated housing requirements in order to secure homes located in the right places. In particular, Gedling Borough will need to see significant growth in order to meet the requirements of the proposed new standard method. For Gedling Borough, the requirement increases from 9,160 homes to 10,680 homes over the 20-year plan period; or 534 dwellings per annum (increase from 458 under the previous standard method).

Persimmon commented that the government's review of the Standard Methodology represents a sizeable increase in the number of homes Nottingham City must now accommodate. The standard methodology algorithm is subject to continual adjustments however at this early juncture an increase to the baseline housing requirement is evident. The baseline LHN represents the minimum housing requirement councils should seek to provide. The Frameworks objective to significantly boost the supply of homes stands (Para 59) remains therefore further increases to the housing requirement may be applicable where:

- Past oversupply points toward greater demand for housing than currently indicated by government standardised methodology forecasts. In such circumstances housing numbers should be increased to meet this need.
- Affordable housing shortfall occurs where the gap between average earnings and average house prices continues to increase.
- Economic growth aspirations for Nottinghamshire must be supported with new housing provided for workers. An upward adjustment in the housing number may therefore be required.
- The sustainability of new homes far exceeds that found in old housing stock. The delivery of new housing choices will therefore aid in meeting the governments and this plans objective to address climate change through increased energy performance.

An important concern may arise from the proposed revocation of the Duty to Cooperate. Should this arise then Nottingham City's capacity to redirect its housing requirement to neighbouring authorities may also disappear. The GNP will need to grapple with how best to address this issue.

The Planning & Design Group (UK) Limited on behalf of the University of Nottingham commented that a specific additional factor to justify planning for more new homes than the standard methodology suggests might be the aspiration for economic growth, which could otherwise be constrained by a lack of housing supply. A key example could be the area surrounding the regional HS2 rail hub at Toton whereby economic growth aspirations would

need to be commensurate with an uplift in housing numbers to accommodate and support that economic growth delivery.

Savills on behalf of Taylor Wimpey and on behalf of Landowner

Consortium commented that the Local Plan Period should be moved up to 2040 in the interests of clarity. Moving this plan period on, the New Emerging Standard Methodology stipulates a need for 66,380 dwellings for the Greater Nottingham region (including Erewash) from 2020-2040. This represents a 10% increase on existing annual dwelling need and highlights a need to plan for an additional 42,252 (less 24,128 dwellings of planned need up to 2028) new homes 2020-2040 across Greater Nottingham. Fundamentally, the figure should be used as a starting point before considering the impact of economic growth to come to a more realistic housing need figure for the region. Having regard for the New Standard Methodology, highlight the importance of all local authorities within the Greater Nottingham region working together under Duty to Cooperate to provide sufficient homes for the region. This is especially relevant as a number of Greater Nottingham authorities have experienced significant increases in housing numbers following the new standard method, including Rushcliffe increased by 36% and Broxtowe increased by 35%, for example. It is the role of neighbouring authorities such as Erewash to work with the wider city region given the strategic links, control over the western edge of Nottingham and resultant Duty to Cooperate obligations in accordance with paragraph 26 of the NPPF. Greater Nottingham should include a significant uplift to the standard methodology to enable GN to consolidate themselves as an ambitious conurbation and to ensure it becomes a leading city region. In the interests of effective and positive planning.

Savills on behalf of Rushcliffe Borough Council (RBC) who own land at Edwalton Golf Course, Rushcliffe state that in order to counteract the imbalance of housing need and housing supply, the Strategic Plan must allocate more land for residential purposes. The Plan should focus on releasing land adjacent to the urban area for development. From reviewing the brownfield land registers for each of the Nottinghamshire authorities, the maximum number of dwellings that can be delivered on Brownfield Land is around 15,687 dwellings. This represents 19.5% of the overall housing requirement which is 64,530 dwellings below the target.

Stantec on behalf of Barwood Homes commented that they have serious concerns about the appropriateness of GNPP's proposals to apply the household projections published in September 2018 as the basis of the housing requirement within the emerging GNSP. It is widely accepted (e.g. by the HBF and the Local Plan Experts Group) that a 'buffer' of additional site allocations of up to 20 per cent should be planned for, over and above the minimum housing requirement, in order to guard against non-delivery of allocated sites. Consider it is necessary to identify and allocate sufficient housing sites at this stage to meet the areas LHN need requirement based on the proposed methodology plus a 20 per cent 'buffer' as described above.

Star Planning on behalf of Woolbro Morris recognise that the standard method will establish a minimum housing requirement for the plan area. The current standard methodology indicates an annual need for about 2,580 dwellings within the Greater Nottingham Planning Partnership Area. There is no justification presented to date which suggest anything other than the minimum housing need should be planned for within the plan area as a whole or Gedling District. It is currently unclear whether, in establishing what might be the actual housing requirement to be met during the plan period, other material matters may still be need to be taken into account as identified in the current Planning Practice Guidance, including any growth strategy within the plan area; strategic infrastructure improvements that are likely to drive an increase in the homes needed locally and any unmet housing need from neighbouring authorities. Within the plan area, the HS2 East Midlands Hub at Toton is a significant infrastructure project which can be expected to drive an increase in housing need within Greater Nottingham. As already noted, locating additional growth at Toton would adversely affect the critical Green Belt gap between Derby and Nottingham but the economic and housing growth implications of the Hub cannot be ignored. Further, the Consultation document does not mention the possibility of meeting part of the housing need of adjoining authorities. Both these matters are not fully recognised as drivers for determining the actual housing requirement for Greater Nottingham and, as such, they need to be fully assessed and considered. The Councils should reconsider the plan period. Other local plans are planning for growth up-to 2050 to provide a longer term strategic vision for their areas. The time horizon for Greater Nottingham does not have the same aspiration.

Stone Planning Services on behalf of Aldergate Properties Ltd commented that the emerging Standard Methodology requirement should be considered as a minimum and the starting point in determining future needs. If the new methodology is taken into account, then Appendix 1 (Greater Nottingham Strategic Plan Growth Options) shows a very significant deficit of supply over 6,000 dwellings) in the currently defined strategic plan area even excluding part of Ashfield. In addition, HS2 will be a major influence on the Nottingham conurbation economy over the life of the plan. It could generate very significant levels of jobs and this growth needs to be accounted for in future housing need, especially to the west in Broxtowe, Erewash and Ashfield.

Taylor-Wimpey commented that the amount of housing established should, as a starting point, have due regard for the standard methodology for calculating housing need. It is considered that there is no robust justification to reduce housing need below the level established by the updated Standard Methodology. To ensure flexibility and delivery, the Councils should seek to allocate land in the region of 15% above the established Housing Requirement.

Turley on behalf of IM Land commented that the NPPF is clear that the standard method should be seen as the minimum starting point for calculating

housing need and ultimately in seeking to significantly boost the supply of homes. Do not consider that there are any over-riding environmental constraints to justify a housing requirement figure lower than the minimum local housing need. The GNSP should be aiming to maximise the economic potential of the sub-region by capitalising on existing and planned investment in infrastructure and delivering new homes.

Wood PLC on behalf of The Crown Estates commented that the proposed changes to calculating housing need indicates a higher level of growth for the Nottingham Core area, with the most significant increases potentially being in Rushcliffe and reductions for Nottingham City. This needs to be considered as part of the spatial strategy and highlights the problems associated with a strategy overly focused on the MUA, i.e. the failure to deliver enough homes where they are needed. It also means that a 'buffer' is required to ensure the plan is flexible enough to respond to these increasing requirements and without repeated pressure for Green Belt boundary review.

William Davis commented that there is not considered to be any justification for planning for fewer houses than produced by the updated standardised housing methodology which is expected to be published later this year. There are no national parks, AONBs or SPAs/SACs/Ramsar sites in the area as set out in footnote 6 of the NPPF. The potential prospective SPA in the Sherwood Forest area is noted but this has been identified for over 10 years with little if any progress made towards formal adoption; the evidence justifying the identification of this area should be reviewed to establish if it still meets the level required and a decision made as to whether the site is worthy of identification as a potential SPA. While the plan area includes Green Belt, it is considered that sites can be removed from it to sustainably deliver the required level of housing without conflicting with the purposes of the Green Belt. It is considered that additional homes, over and above that required to meet local housing need, should be provided for. This would ensure that there is sufficient flexibility to account for the drop off between permissions and completions, make best use of the economic uplift resulting from HS2 and meet the growth requirements of one of the major conurbations in the Midlands Engine area. The most appropriate figure for flexibility will need to be considered but the Local Plans Expert Group identified a need for around an additional 20% on top of housing need which should be used as a starting point.

Wilson Bowden commented that the NPPF and PPG are clear that the Standard Method sets out the minimum number of homes that an authority should plan for. As set out in Appendix 1 of the Growth Options consultation document, the minimum number of homes that the Authorities should plan for using the Standard Method is 59,420 homes (including Erewash Borough Council's ('EBC') need) between 2018-2038. Currently Figure A1.1 sets out that the authorities have an estimated supply of 61,963 (from 2018). This figure comprises 8,689 dwellings that have been taken from EBC's SHLAA with no justification that all of the sites listed in the SHLAA are deliverable.

EBC have consistently failed to deliver the housing they need (62% in the 2019 Housing Delivery Test) and can currently only demonstrate a 3.43 year supply of housing (2019 Five Year Housing Land Supply Statement). We therefore consider it unlikely that they have 8,689 deliverable sites. Additionally, 1,000 homes have been added to Rushcliffe Borough Council's housing delivery requirement but these are not expected to be delivered until after 2038. Therefore, do not consider it appropriate to include the 1,000 homes and if removed from the total, notwithstanding the potential for EBC's total to reduce significantly, it leaves 60,963 dwellings. Do not consider that there is a sufficient enough buffer between the minimum need and estimated supply of new homes (1,543 dwellings) that should be provided across the HMA between 2018 - 2038. In addition to the above, paragraph 2.22 of the Growth Options Study states that there has been a cumulative shortfall of delivery against the core strategy targets of 2,883 homes. This shortfall along with the unknown impact of the Coronavirus pandemic on delivery, are further reasons why the Greater Nottingham Authorities should plan to deliver more housing than the minimum requirement of 59,420 dwellings.

WSP UK Ltd (Agents working on behalf of Global Mutual / The Victoria Centre Partnership) commented that Global Mutual supports the latest standard method calculation for housing requirements as set out in national planning guidance (updated 16 December 2020), which informs the number of homes needed and seeks to prioritise brownfield sites and urban areas. Nottingham should continue to promote new development sites to increase the provision of new homes and should support new homes on brownfield and urban areas especially in Nottingham City Centre.

Summarised comments from other organisations

Burton Joyce Climate Action Group commented that more social housing and affordable housing is needed.

Carlton and Gedling U3A commented that evidence that Local Authorities would exercise to the full their powers to bring vacant dwellings into use and to encourage the repurposing of redundant non-residential buildings to provide accommodation

The Home Builders Federation (HBF) commented that the Government's standard methodology identifies the minimum annual LHN. It does not produce a housing requirement figure. LHN assessment is only the minimum starting point. Consider going above if:

- The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, this level of delivery may be indicative of greater housing need
- if future jobs growth will generate a need for an increased labour supply to meet increasing employment demand, this will in turn lead to a need for new homes to accommodate the new population.
- Households whose needs are not met by the market

- informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated. The SOCG should be publicly available at publication stage.

If the Government's proposed new standard methodology comes into effect, then the LHN assessment should be revised. In Greater Nottingham, there are no over-riding environmental constraints to justify a housing requirement figure lower than the minimum LHN.

Homes England and DIO agree, in response to question OS6, that the standard methodology ought to represent the starting point for the calculation of housing need in the Greater Nottingham area. Homes England and DIO also support the recognition at Paragraph 2.25 of the consultation document that there may be demonstrable reasons to establish a housing target greater than the outcome of the standard methodology. In this context, that Government is currently consulting on changes to the standard methodology. If changes to the methodology are implemented, then they would expect the Greater Nottingham authorities to have regard to this when preparing the Plan.

Nottinghamshire CPRE commented that the standard housing 'need' (really demand - government guidance does not distinguish between the two, CPRE do) assessment is based on the 2018 household projections. It is doubtful that these are still relevant after Coronavirus and Brexit. These factors strongly suggest a lower overall housing number but at the same time higher proportions of affordable, rented and urban accommodation.

Nottinghamshire Wildlife Trust commented that in general, they do not welcome any additional housing allocations in the plan area because there are, in our view, already significant unused allocations in all of the Locals Plans. This is also recognised at paragraph 2.28 of the GO document. Identifying more sites risks increasingly unsustainable sites being chosen in terms of communications, services and their impacts on wildlife habitats and landscape because, in many cases, the least damaging locations have already been selected.

Rushcliffe Green Party commented that we do not accept that any additional housing allocations are needed in Rushcliffe beyond those currently allocated in the current Rushcliffe Local Plan. There are already significant unused allocations and Rushcliffe is becoming increasingly unsustainable in terms of communications, services and the impacts on wildlife habitats and landscape.

Rushcliffe Borough Council Leake Ward Councillors commented that 1,304 dwellings on 11 sites have been granted planning permission since 2012.

A Rushcliffe Councillor commented that arrangements with other neighbouring areas to ensure all brown field sites are considered for development. This is NOT to say the Broadmarsh should be converted into flats: that would be a disaster for the City we all enjoy using.

Sharphill Action Group (SAG) commented that the Covid-19 virus could well have significant repercussions in respect of restricting population growth, levels of migration, mortgage/housing demand and overall economic activity. SAG would thus suggest that some of the 2018 figures and trends collected to inform the Growth Options process, should be viewed as unreliable from the outset. A future decline in demand for housing and space for office & commercial uses could strengthen the case for the Urban Intensification Strategy emerging from Chapter 2. In effect, it would tend to undermine any arguments that favour a more dispersed pattern of development at lower densities on 'easier' sites and/or concentration upon the urban fringe.

Summarised comments from local residents

Some residents suggested more homes than the standard methodology:

A resident commented that Nottingham has University students whom it should always look to encourage industries to set up in the area to promote a graduate city. Nottingham should always seek to take in immigrants and refugees as well as encourage British people to move from other cities e.g. London. Nottingham is in the Core Cities UK, and should look to compete with Bristol, Sheffield, Newcastle and Leeds in terms of population growth. This can only be accomplished if industries locate here and if there was a range of housing. I would like to see that ethnic minorities are encouraged to live in Greater Nottingham as well as young families from large cities.

A resident commented that the HS2 rail route will require demolition of housing and in turn requires replacement dwellings etc. If the UK invites or allows more refugees/migrants to come to / remain (asylum seekers) in this country. The low level of delivery requires more sites to be identified/ easier to obtain permission on sites within GB settlements, to achieve the new homes required. Delays have been due to on - site issues, Covid-19, expected 90%+ delivery of identified sites within the plan period

A resident commented that more houses should be built especially small and dense.

A resident commented that new housing in excess of 50,000 would need to match proposed employment opportunities and scope for commercial development within Nottinghamshire. I would like to see matching proposals for commercial development and employment in Rushcliffe to match the suggested target of 13,450 homes.

Some residents suggested fewer homes than the standard methodology:

Five residents commented that the 'Nottingham Housing Market Area Local Housing Need' in Appendix 1 of the Greater Nottingham Strategy Plan appears to indicate that there is sufficient housing supply already identified until 2038. It is therefore unclear why a strategy is required for even more

housing. If growth is still required up to 2038 it should be concentrated in a new Garden town near the A453 and M1. Extensions to existing settlements are less sustainable and much more damaging to existing rural assets.

Four residents commented the same as Barton-in-Fabis Parish Council, adding that the plan should propose a viable weighting of factors such as impact on the wider environment and impact on key criteria including impact on the Green Belt and climate change this is what the AECOM 'Growth Options Study' has lamentably failed to do and needs to be withdrawn and recalculated.

Nine residents commented that there is justification for planning fewer homes if it is clear that the existing infrastructure would be unable to sustain the development for example, in a village such as Ruddington.

Several residents referred to Brexit and Covid impact including a resident commented that the following are presumably yet to be calculated but may alter existing ONS projections:

- Revision of population growth estimates due to impacts of Brexit.
- Revision of population growth estimates due to impacts of COVID-19.
- Revision of population growth estimates due to impacts of COVID-19 on the local economy e.g. loss of large businesses that attract inward migration to the area.

Any planning decisions that are taken in advance of such data becoming available may be unwise and lead to 'white elephant' type projects.

A resident commented that does the local planning need from the NPPF relate to existing population? If so, is the large planned build just an artefact of our high population density? Consider a borough of London. Would the NPPF require plans for thousands of new homes (for which there is no space)? If this is the case I would argue that a much lower planning target should be assumed, taking out Nottingham city (and so roughly 1/3 of the requirement) as a minimum.

A resident commented that the Standard Methodology provides a nationally recognised standard approach designed to avoid prolonged debate about the derivation of the requirements and in this we support its introduction. There may be potential through Neighbourhood Plans for instance, to increase the amount of provision in smaller communities to meet specific needs such as affordable housing, such as on exception sites, where particular local needs are identified through local housing needs studies.

Three residents commented that the number of homes should correspond to the amount of local employment available in the area not be determined by national planning. Increase in housing should be limited as infrastructure such as main arteries into Nottingham cannot cope.

Two residents commented that any new homes must be supported by adequate infrastructure. The Options Consultation presents a defective evidence base in respect of existing provision of such infrastructure. A settlement-based assessment of such infrastructure could contribute to an understanding of locations (specific settlements, groups of settlements and / or wider areas) that may be suitable for and be able to accommodate higher levels of growth (i.e. more homes), in particular if such growth contributed to the settlement achieving a more 'optimal' balance between the number of homes, population and infrastructure. Therefore, if a site or sites cannot sustain additional new housing then this justifies planning for fewer new homes than the standard methodology suggests.

Seven residents commented that the current pandemic the speed of technological change and the effects of Brexit all mean that housing need must be reassessed and/or locally assessed on a methodology that has been agreed by the public and a continuous process. If you want to convince the public that we are delivering on local need and not, simply delivering on out of date top down imposed targets.

A resident commented that new employment opportunities at Toton (10,000 new jobs) and Ratcliffe might suggest that more housing is required than the standard methodology would suggest. However, (particularly at Toton Innovation Campus) these will be high skilled jobs which will raise the average salary of the area which would imply that the number of Affordable Homes required should be lower than might be suggested by the absolute increased number of homes. Smaller homes should be the focus for new developments.

A resident commented that there are significant constraints across the development plan area that justify a lower minimum housing figure than that determined through the standard methodology. The last Green Belt review set out to remove sufficient land from Green Belt for beyond the current plan period – in accordance with the NPPF: “Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.” It would, therefore, be unreasonable for further Green Belt releases to now be mandated through this plan process. There is a responsibility for the planning authorities to protect the Green Belt - its repeated erosion is unsustainable and there should be a requirement for areas beyond the Green Belt to contribute to fulfilling the identified future housing need.

The matrix approach to assessing the sustainability of housing proposals does not give sufficient weight to environmental/historic resources that are important to a local area in the manner that it is separated into Part 1 and Part 2 of the plan process. This allows housing figures for localities to be determined in advance of considering that locality's capacity to sustainably accommodate that quantum of housing.

A resident commented that provision should be modelled on developments that are already in existence where data can be gathered to indicate the

quality of life and infrastructural needs of communities. The number of houses can then be calculated based on community needs and not the developers' financial aspirations. A housing programme should provide for a quality of life that can be sustained. In the area around Bingham there is considerable new housing development but apparently no plans for a new secondary school.

It is important to note that there is increasing evidence that housing demand is not outstripping housing supply as clearly set out in the evidenced-based analysis: 'Tackling the UK housing crisis: is supply the answer – and yet current planning policy is having to respond to an ostensibly significant long-term shortfall in supply. Whilst local planning authorities are obviously constrained by the political context, it is interesting to be aware of the counter-argument. There are significant constraints across the development plan area that justify a lower minimum housing figure than that determined through the standard methodology. The last Green Belt review set out to remove sufficient land from Green Belt for beyond the current plan period it would, therefore, be unreasonable for further Green Belt releases to now be mandated through this plan process. There is a responsibility for the planning authorities to protect the Green Belt - its repeated erosion is unsustainable.

A resident commented that any deviation from these numbers should only be considered where it can be evidenced that the need for more homes greatly outweighs the negatives including protecting the environment, conservation of rural areas and habitats and the Green Belt.

A resident commented that we need to build the houses we have already given permission for before building any more. We also need to ensure all houses in our region are regularly inhabited.

A resident commented that as more people work at home there will be less need for new green field developments. By the end of next year there will be a large amount of unoccupied commercial and retail premises many of which will be suitable for conversion to domestic use.

Locational specific comments included:

A resident commented that no factors can be evidenced that justify planning for more homes in Rushcliffe in general and in the Radcliffe, Newton, Bingham areas in particular. Further removal of land from the remaining Green Belt and the inevitable impact on the existing and planned road infrastructure would inevitably have a detrimental impact on climate change and the declared attempt to become carbon Neutral by 2030.

A resident commented that no further green belt needs to be lost in South Broxtowe. Broxtowe can meet its housing needs in the foreseeable future from its existing identified sites.

A resident believes that the proposed development of Bank Hill, Woodborough Village is a direct contravention of Planning Policy. It does not respect local context and street pattern or, in particular, the scale and

proportions of surrounding buildings, and would be entirely out of the character of the area, to the detriment of the local environment.

A resident commented that the proposed garden village of Orston/Elton is a huge worry from a flooding perspective (amongst other points).

A resident commented that they strongly believe that we should protect the open areas abutting suburbia, rather than let it creep outwards. The value of such open areas has been very apparent during lockdown, with many people using the open space to both exercise and to help their mental health.

A resident commented that more housing land should be planned for. An appropriate location for this is the Ratcliffe on Soar Development Corporation proposals, which offers opportunities for linkages with East Midlands Airport and an opportunity for wider cross boundary strategic planning with Leicestershire.

A resident commented that they would like to complain about the amount of housing that is currently ongoing and being planned around the borough of Gedling. The towns that accommodate these areas are becoming packed and unsavoury with crime on the increase.

A resident commented that in light of the proposed revised standard method based on the current estimated supply the local planning authorities do not have sufficient supply to meet the identified local housing need established by the revised standard method. Consequently, more housing land should be planned for. An appropriate location for this is the Ratcliffe on Soar Development Corporation proposals, which offers opportunities for linkages with East Midlands Airport and an opportunity for wider cross boundary strategic planning with Leicestershire.

Five residents commented that as things stand the current infrastructure cannot cope with the size of the Calverton village now. Currently there are no plans for any new roads, schools, doctor's surgery, sewers etc. There will be a significant increase in traffic onto the 6386 Oxtan Road. Calverton plans would create a large number of house, separated from the main village centre by a main road, ultimately creating an island of houses isolated from any facilities.

Eight residents commented that there is justification for planning fewer homes if it is clear that the existing infrastructure would be unable to sustain the development for example, in a village such as Ruddington. Ruddington has had a large amount of new housing over recent years and developments are on-going. Further building on open land to join the historic village to Clifton / Edwalton, etc. will result in additional traffic in the already-congested narrow village streets, which will not be mitigated by the proposed considerations. I believe that this will have a negative impact on the unique character of this historic village.

A resident commented that we should plan for building many more houses in the city centre and redeveloping the Broadmarsh site for housing

Other more general comments

A resident commented that the standard methodology is not explained here and requires considerable reading to understand it.

A resident commented that the birth rate should be taken into account when considering future housing needs .

A Councillor at Bingham Town Council commented that the government is consulting on changing the standard methodology and future housing targets. If the amount of new housing is changed significantly, then there should be another consultation on the new figures.

A resident commented in favour of quality over quantity. Why can't the City Council set up a construction company? Develop build and community standards consult local communities and providing training and employment for young people.

A resident asked if we can redevelop existing ageing properties and bring them up to more efficient energy and living standards.

A resident commented that this is not reflecting the local true level of housing need - this seems to me is just statistics in National terms. The reality will be different. We should reflect the true level of housing need.

A resident commented that such emphasis on climate change, global warming and destruction of the natural world I would wish to see a halt to the building of more housing estates and roads and see more tree- planting and preservation of the remaining beautiful countryside we have left.

A resident commented that previous growth predictions should be compared with the actual figures for that period.

Site specific comments relating to Questions OS7, OS8 and OS9 are summarised after Chapter 10.

7. Question OS7: Growth Options

Which of the broad areas of search identified in the Growth Options Study do you prefer, and why?

(Specific comments regarding sites are summarised separately)

Summarised comments from statutory organisations

Amber Valley Borough Council note that the potential locations identified in the 'Growth Options Study' which would be most likely to impact on Amber Valley residents are those within the northern part of Broxtowe Borough (the 'Brinsley Extension' and the 'Eastwood Extension'). However, within those areas, there are only three potential sites that have been submitted to Broxtowe Borough Council and none of these would have any material impact on Amber Valley.

Barton in Fabis Parish Council state that the Growth Options Study is not fit for purpose and deeply flawed in its 'Study Principles'. The accuracy of data in the study is, in many cases, inaccurate misleading and / or incorrect. The methodology is incoherent and lacking robust analysis. As such, it would be inappropriate to comment on broad areas until this work is amended.

Bingham Parish Council considers that the areas around the principle urban area and the areas around the HS2 corridor best match the objectives of urban intensification and transport-led development. The A52 corridor area is poorly linked to these objectives.

Calverton Parish Council prefer the broad areas that have the highest potential for sustainable growth - principally those constituting urban extensions. Accessibility to the transport infrastructure of the M1, tram network and future HS2 is important - as is the presence of good local employment provision - with the potential for expanding that provision. There is also a preference to avoid developing areas that would have significant negative landscape/heritage impact.

East Bridgford Parish Council are very concerned that the parish is identified as a growth zone centred on Bingham A46, A52 and A6097 junctions. The Village Community Plan shows no support for development in the green belt, so green belt erosion is a major concern. Concerned about the amount of traffic through cramped road network and development would put pressure on village infrastructure. There's still capacity on existing large scale developments in Bingham and Newton plus room for some industrial /retail along the Fosse Road. Therefore, our proposal is that the yellow coloured growth boundary should not extend north/north east of the A6097 or further west than the line of the A46 dual carriageway - therefore exclude East Bridgford.

East Leake Parish Council consider that more priority should be given to areas north of the River Trent, because of the lack of bridge capacity. Very little seems to have been considered to the north east of the city.

Erewash Borough Council that the methodology central to the AECOM study and conclusions is described as 'policy-off' and therefore does not in itself provide any justification for the release of Green Belt land throughout the study area. However, notwithstanding the 'policy-off' stance taken by the study, EBC is nevertheless pleased to note that the study's conclusions in respect of how preferred sites identified by the Erewash Growth Options consultation document have been assessed are not contradictory. As such, the study reaffirms the suitability of the six Erewash sites (four Green Belt sites and two non-Green Belt sites) as appropriate locations for new housing development.

Gotham Parish Council consider that the Growth Options Study is not fit for purpose and deeply flawed in its 'Study Principles'. The accuracy of data in the study is, in many cases, inaccurate misleading and / or incorrect. The methodology is incoherent and lacking robust analysis. As such, it would be inappropriate to comment on broad areas until this work is amended.

Ravenshead Parish Council support the broad areas of search that focus on sustainable urban extensions, rather than increasing allocations to what are defined as main settlements. It does not support further allocations in G01, G02, G03, G04, G05, G06, G08 or G10.

Ratcliffe on Soar Parish Meeting state that the Growth Options Study is not fit for purpose and deeply flawed in its 'Study Principles'. The accuracy of data in the study is, in many cases, inaccurate misleading and / or incorrect. The methodology is incoherent and lacking robust analysis. As such, it would be inappropriate to comment on broad areas until this work is amended.

Radcliffe on Trent Parish Council consider that housing development should be concentrated nearer growth points such as the Toton Hub, HS2 and Ratcliffe on Soar regeneration area to minimise the impact of additional commuting and road congestion.

Ruddington Parish Council note that areas that cause coalescence between settlements or settlements and the city should be avoided to ensure that the identities of individual settlements are preserved.

Sutton Bonington Parish Council suggest that further full detailed analysis is undertaken to ascertain which settlements can sustainably absorb growth, to include areas that have already 'done their bit'. R15 and R17 will have knock on effects environmentally and with traffic to neighbouring settlements. Rushcliffe is being 'targeted' to additionally increase its housing supply as neighbouring Boroughs are suggesting they are incapable of fulfilling the requirements within their own Boroughs. There is a case for another fundamental Green Belt review and set in stone a new Green Belt

boundary which we can rely on for say the next 30 years. Biodiversity and sustainability must be at the forefront of any new allocations. We are particularly worried that R15 has 'high potential for strategic growth' – yes at the A453 corridor and the Ratcliffe on Soar power station but not at Kingston on Soar.

Tollerton Parish Council note that in the absence of previously referenced strategic issues and evidence arising from coronavirus the broad areas of search fail to include the potential for a new form of regeneration in town and city centres. In the absence of a decision on the approach to growth it makes it difficult to comment on the suitability of the areas of search at this time unless each site is considered against each criteria.

Thurmpton Parish Meeting state that the Growth Options Study is not fit for purpose and deeply flawed in its 'Study Principles'. The accuracy of data in the study is, in many cases, inaccurate misleading and / or incorrect. The methodology is incoherent and lacking robust analysis. As such, it would be inappropriate to comment on broad areas until this work is amended.

Urban Vision Enterprise on behalf of Linby Parish Council considers that growth options should prioritise the re-use of previously developed land or where development would facilitate the growth of sustainable transport infrastructure. The development of green-belt land or safeguarded land should not be prioritised. The AECOM Study identifies potential for "over 7,000 hectares of strategic development, well above the requirements for development land for the coming plan period to meet housing and employment need." 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.

Summarised comments from developers

Andrew Hiorns Town Planning Limited on behalf of Parker Strategic Land Limited (site at Cotgrave) suggests that the potential for large new areas for development at Cotgrave are more limited, and while development has been successful in regenerating the colliery site we consider that development should reflect the scale and character of the settlement. If large scale development is to take place, this is better located to the east of the town, and Broad Location RO8 includes the Colston Gate site.

Andrew Hiorns Town Planning Limited on behalf of Parker Strategic Land Limited (Catstone Green site) prefer options adjacent to the urban area, particularly to the west and identified as site B08 which includes our proposed SUE at Catstone Green. However, the evaluation should not be skewed by other land not proposed for development, such as that to the west of Catstone Hill and south of Strelley Village. Account should also be taken of the additional studies we have provided through the 'call for sites' submission.

Andrew Hiorns Town Planning Limited on behalf of Parker Strategic Land Limited (land south of Nottingham Road, Broxtowe) prefers options

in and adjacent to the existing urban area, and particularly sites on the western edge of the urban area. These are identified as sites B08, and include this site BO8.3 and the proposed Strategic Urban Extension at Catstone Green.

Barton Willmore on behalf of JG Woodhouse & Sons considers that the R12 Ruddington Extension is classed as a village expansion typology and a 'potential area for strategic growth' and incorporates both areas of land plus the land in between. Both sites promoted for development (R12.3 and R12.4) are identified as 'suitable' sites, with the remaining areas of land in Ruddington (R12.1 and R12.2) identified as 'potentially unsuitable'. The evidence base therefore points clearly towards these two sites providing a strategic growth option for the future growth of Ruddington.

Bidwells on behalf of Trinity College suggest that broad area of search G05 'Bestwood Village /Redhill Extension(s)' should be progressed as a growth option moving forward, specifically sites ref G05.1 'Land to the west of the A60, Redhill' and site ref G05.2 'Land to the north of Bestwood Lodge Drive'. (This matter is discussed in detail as part of the response to Question OS9 and within the submitted Vision and Delivery Document).

Boyer on behalf of Mr David Herrick disagree with the assessment of site R14 in respect of transport and connectivity (the site lies between the A46 and A606 - highly accessible location with primary access already provided, secondary access achievable and bus diversion feasible), economic development (employment land now proposed as an extension to the site from the original submission) and deliverability. The submission includes a masterplan and further information on highways improvements.

Boyer on behalf of

- **Harworth Group**
- **Stagfield Group**

considers is not clear how the broad areas of search were identified in the Growth Options study and at this early stage consideration should not be limited to only 48 areas. The Growth Options Study neglects the potential of smaller sites that are not located within the 48 major development areas. Question OS7 restricts the scope of consultation and predetermines the spatial strategy and narrows the scope of consultation. There is a concern that the Growth Options Study is pre-disposed to a strategy option that continues the concentration of housing provision close to areas that have previously been subject to major development.

Boyer on behalf of Strawsons Group Investments Ltd note that as promoters of land on the east side of Cossall Road Trowell, we support the identification of B07 "North of Trowell" and the assessment in the GOS. The identified issues can be addressed through the masterplanning and design of development in this area and are not factors that count against site

selection. Development at Trowell could be transformational in terms of the status and performance of the settlement as a highly sustainable location.

Boyer on behalf of Mr Stubbs and Mr Whittington disagree with the AECOM study's consideration of their site. In terms of transport and accessibility, the assessment does not take sufficient account of the bus service along A60. It does not take into account the potential to provide a tramline extension. Also potential for a park and ride. In terms of economic development, they consider the presence of significant local employment is an asset and provides the opportunity for new residents of a new settlement in this location to work locally with minimal need to travel.

Carter Jonas for Burhill Group Ltd prefer the broad Area of Search at G06 – Calverton Extension and specifically G06.2 Ramsdale Park Golf Centre Site and G06.3 Ramsdale Park Golf Centre Site B.

Fisher German on behalf of Landowner East of Mansfield Road considers that the Eastwood Extension broad area of search (reference B02) represents a logical location for allocation as it is sustainably located adjacent to Eastwood, a highly sustainable settlement. Of the land within the broad area of search, the land east of Mansfield Road is well linked to existing services and facilities, not constrained by environmental designations and would have a limited impact on coalescence. Circa 350 dwellings could be brought forward with adjacent land to deliver 450 units.

Fisher German on behalf of Samworth Farms Limited consider that the Greater Nottingham Strategic Plan should positively consider the delivery the Radcliffe on Trent extension (reference R06), in particular the land highlighted yellow to the north and east which could deliver up to 700 dwellings. The site could be delivered with land to secure comprehensive development east of Radcliffe on Trent. The site has been assessed as having high potential for strategic growth in the Greater Nottingham Growth Options Study (GNOS), a scoring which is supported.

Fisher German LLP on behalf of Mr Malcolm Hodgkinson suggest that Growth Option B03, particularly the land highlighted at Figure 1 should be considered favourably. This land has a strong relationship with the submitted site at Stubbingwood Farm, Watnall Road (B03.1), and both would form a logical and sustainable expansion of Hucknall. It is considered the release of the Green Belt in this location is considered to be beneficial and justifiable against the exceptional circumstances test in the NPPF, with appropriate mitigation. Hucknall is one of the most sustainable urban settlements in Nottinghamshire and offers a prime opportunity to deliver much needed growth in a sustainable location.

Fisher German LLP on behalf of Taylor Wimpey (Land at Chilwell Lane, Bramcote) considers that the Greater Nottingham Strategic Plan should positively consider the delivery of land to the North East of Toton (reference B09). This land is sustainably located, adjacent to the Nottingham Urban Area. It is close to the strategic road and NET networks. The inclusion of

land west of Chilwell Lane is supported as part of the wider B09 Toton North East area. Whilst individually the site is lower than the requisite 450 dwellings, when considered with adjacent promoted land to the west, the entire allocated area could provide for circa 3,000 dwellings. It is noted however that the promoted land west of Chilwell Lane can come forward as part of this wider allocation or independently and is not reliant on third party to land to deliver.

Fisher German on behalf of The Trustees of the Locko 1991 Settlement consider that the Greater Nottingham Strategic Plan should positively consider the delivery of land to the East of Derby (reference E06).

Fisher German on behalf of Landowner north of Nuthall consider that the Watnall Extension area of search (reference B04) within the Greater Nottingham Growth Options Study (GNGOS) represents a logical location for allocation within the Strategic Plan. This land is sustainably located adjacent to Watnall and Kimberley, a highly sustainable built area. As set out in the GNGOS, this broad area benefits from access to an array of services and facilities which will ensure this development is sustainable from day one of the first house being delivered. We fully support the delivery of strategic level growth adjacent to Watnall and Nuthall.

Geoffrey Prince Associates for Hammond Farms are promoting an urban extension on land at Land at Stockings Farm, Redhill (G.07.1). It is recognized that other areas for growth will need to be identified throughout the GNA to meet long term needs.

Geoffrey Prince Associates for Langridge Homes are promoting urban and key settlement extensions on land at: Redhill (G.07.1); Carlton (G09.1); Bestwood (G05.3); Calverton (G08) and Cotgrave (R08.1 and 08.2).

Grace Machin Planning and Property for S and C Voce support the broad areas of search within or adjoining the Nottingham Main Built Up Area and also support the identification of certain settlements for future expansion, e.g. Ravenshead (G01).

ID Planning on behalf of Mr John Breedon support the 'More-Dispersed' growth option which should include the extension of existing settlements of varying levels in the hierarchy, such as Aslockton. Our preferred approach would promote existing settlement vitality and would directly address local housing needs in different locations, rather than accommodating all housing growth in the main built-up area and at one garden community.

Marrons Planning on behalf of Whitefields Farm agree that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. It is understood that supply includes SHLAA sites, a number of which are unlikely to be allocated and it may be sensible to assume that the figure of 6,236 homes is a minimum figure. It is understood that the Greater Nottingham authorities have agreed to meet their own growth in principle. Whether that is possible

having regard to the strategy remains to be seen. Note the implications of the emerging standard methodology figures. A hybrid strategy is suggested with a range and choice of housing and employment sites; sustainable urban extensions adjacent to the urban area and expanded existing settlements.

Nexus Planning on behalf of CEG Land Promotions I (UK) Ltd supports a mixed growth strategy where strategic sites are allocated at accessible locations that help address regeneration priorities and deliver strategic growth and infrastructure capacity / potential. However, strategic allocations need to be proportionate to the character of the settlement areas.

nineteen47 on behalf of Richborough Estates support the identification of the Calverton Extension broad area of search, ref G06.

Oxalis Planning on behalf of Bloor Homes Midlands note that the land northeast of Toton (BS9) has several key attributes which would enable the area to deliver sustainable development. Indeed, the development of the HS2 Hub Station is referenced throughout the Growth Options document and Aecom Study. The attributes of northeast of Toton include:

- There is existing infrastructure in place to support development;
- The area can link to excellent public transport services including the tram;
- The area can integrate with the existing urban area of Nottingham;
- The area will link with the planned growth at the HS2 Hub Station;
- The area can deliver significant areas of new green space, for recreation and biodiversity enhancement;
- There are no environmental sensitivities to prevent development.

Oxalis Planning on behalf of Richard Taylor note that the opportunities and benefits presented by the HS2 Hub Station at Toton are referenced throughout the Growth Options Document. The Northeast of Toton broad area (ref. B09) includes land at Hill Top Farm (ref. B09.1) and east of Toton Lane (ref. B09.2) and is identified in the Aecom Study as having a high potential for strategic growth. As identified by the Aecom Study, the Hill Top Farm site (ref. B09.1) already benefits from excellent bus and tram services, which would be further improved by the HS2 Hub Station. The site is well related to the urban area and the A52 to the east would prevent development coalescing with Chilwell. There are opportunities for new, publicly accessible open space and extensive new landscaping. The potential for integration with and links to a wider development of the land east of Toton Lane should be explored.

Oxalis Planning on behalf of W Westerman Ltd suggest that the growth strategy for Greater Nottingham should consider both the locational attributes of particular locations together with the specific benefits (including the ability to minimise harm) of development proposals being put forward. The Aecom report is high level and should be used as such. Each of the four growth options should be utilised but focussing too much on one strategy would result in unsustainable development. A range of sites and

locations should be delivered in order to meet housing needs. The most sustainable sites outside the urban area will be needed, which could be new settlements, urban extensions, or smaller scale development in villages.

Oxalis Planning and Boyer Planning on behalf of W Westerman Limited and Strawsons Property note that the Nuthall Extension (ref. B05) broad area was included in the Aecom Study but is considered below the study's threshold for strategic growth and potentially unsuitable for development due to areas of ancient woodland, the proposed route of HS2, landscape constraints. All of these can be addressed. The Study has missed the potential benefits the Low Wood Road site (B05.1) could deliver in terms of a new park and ride and opportunities to strengthen active travel options through the area. The conclusions of the Aecom Study for site B05.1 are inconsistent with conclusions of other sites and should be afforded very limited weight.

Oxalis Planning on behalf of John A Wells Ltd refer to three sites. The land west of Sharphill Wood, Edwalton is adjacent to the Edwalton SUE with the A52 to the south serving as a defensible boundary and preventing encroachment into the countryside. The site could be developed as a large retirement village which is much needed in the area. The scheme would also bring forward significant benefits in the form of extensive publicly accessible open space and areas for biodiversity enhancement and a bespoke transport and access solution. The Langar Airfield site presents an opportunity to deliver a sustainable new garden village outside the green belt. The new village could be developed with its own character and identity with high sustainability aspirations, including a full range of services and facilities, significant areas of green infrastructure and improvements to public transport provision. John A Wells Ltd also have significant land interests on land located adjacent to the A46 south and east of Clipston Woods (part of site ref. R14 in the Greater Nottingham Growth Options Study). Whilst detailed development proposals have not been developed for the site it is considered that the land, together if necessary with adjacent land, could form a suitable location for a new settlement.

Pegasus Group for Notts County Council note that Top Wighay Farm is located in the 'North of Hucknall' Broad Area of Search which includes Safeguarded Land identified in the Aligned Core Strategy. Hallam Land Management and Nottinghamshire County Council are working collaboratively to bring the site forward and a planning application was submitted in January 2020. Works have already commenced on site to deliver highways infrastructure to serve the future development at Top Wighay Farm.

Pegasus Group for Loughborough Road Consortium comment that land to the West of Loughborough Road provides a sustainable location for residential development and should be considered as part of R12 Ruddington Extension. It could also be included as part of site R12.3 shown as a larger site 'East and West of Loughborough Road'.

Planning and Design Group (UK) Limited on behalf of The Trustees for the Estate of Mrs Joan Winifred Briggs prefer the search area B08 as it adjoins land already allocated for residential development, establishing the sustainability of this location and the Council's acceptability of the principle of development. The land does not contribute to Green Belt purposes and could accommodate growth without the need for substantial new infrastructure. The defensible Green Belt boundary to the west of Nottingham is the ridgeline between area B08 and the M1. The area is one of the most sustainable locations for growth in Greater Nottingham.

Savills on behalf of

- **Taylor Wimpey (Land West of Ruddington)**
- **Taylor Wimpey (Land East of Gamston)**
- **Taylor Wimpey (Land North West of East Bridgford)**

support growth options R01, R07 and R12.

Savills on behalf of Mr and Mrs Peacock support the Broad Area of Search referred to as E10, 'Risley Extension'. The AECOM report demonstrates the need for a joint evidence base to coordinate housing delivery for Greater Nottingham which includes Erewash. EBC should utilise the findings to ensure a truly consistent approach to strategic planning across Greater Nottingham. Growth should be promoted in this location as the site is situated within the broad location E10; the site is located close to the A62 and junction 25 of the M1; the East Midlands hub station at Toton will be located c. 3km from the site once constructed; the site is located within the Flood Zone 1; the site is located within the Green Belt but performs poorly against the 5 purposes; the site can deliver c. 700 – 800 dwellings, with sufficient buffers from the M1 and the site is well connected in terms of walking and cycling.

Savills on behalf of Wilson Bowden Developments (Land at New Farm, Nuthall) support the two areas of search at BO5 (Nuthall Extension) and BO8 (Land off Woodhouse Way) due to their proximity to Junction 26 of the M1 motorway, A6002 and existing employment facilities at Nottingham Business Park and Blenheim Industrial Park. The proposed route for HS2 is expected to remove a significant proportion of developable land and the area should be amended as a result.

Savills on behalf of Wilson Bowden Developments (Land West of Woodhouse Way) support the area of search at B08 (Land off Woodhouse Way) due to its proximity to Junction 26 of the M1 motorway, A6002 and existing employment facilities at Nottingham Business Park makes it a unique and logical extension to the west of Broxtowe. The proposed route for HS2 is expected to remove a significant proportion of developable land and the area should be amended as a result.

Simon Heaton on behalf of Mr S Raynor confirms that land north of Trowell within B7 is available for future housing delivery in Broxtowe. Large strategic sites can be challenging to assemble and deliver, which in turn can put constraint on the delivery of housing. Any strategy should consider how

housing supply can be maintained year on year and major sites may have to be brought forward in phases to help delivery, perhaps allowing areas of land with the least constraint to deliver first.

Summarised comments from other organisations

The Cranmer Group of Parishes believe that new areas of housing should be prioritised in locations which:

- re-use land previously used for development;
- are feasible for development at increased levels of building density; and
- other locations, potentially including some greenfield sites, where there is a combination of good access to (a) existing public transport and cycle route networks (and their potential proposed extensions), and (b) significant sources of employment within short distances.

The preferred strategic development approach is therefore the Urban Intensification Growth Strategy and also the Transport-Led Growth Strategy.

OSVAID support the broad areas of search identified within the Growth Options Study, which lie within or adjoining the Nottingham Main Built Up Area, with an emphasis on re-using previously developed land, through regeneration and the delivery of higher density schemes. Any residual development requirements should be accommodated within or adjoining the existing urban area across Greater Nottingham, through the delivery of Sustainable Urban Extensions.

RAF Syerston request that any planning in the local area is referred to the Defence Infrastructure Organisation (DIO) and RAF Syerston, for airfield safeguarding considerations.

Summarised comments from local residents

One resident suggested that a lower housing target should be argued for with more homes in regions with less pre-existing pressure, as the size of the target means that more locally sympathetic smaller schemes cannot be delivered.

A number of local residents expressed a preference for a particular growth strategy, including the following: -

- the Urban Intensification Growth Strategy coupled with development close to the HS2 Station at Toton.
- the Urban Intensification Strategy to make better use of current urban brownfield sites and as most of the employment opportunities are in the city with 2 main hospitals and 2 universities it would make more sense to repopulate urban areas with already developed good transport links.
- the urban intensification growth strategy would locate people closer to employment opportunities reducing reliability on road usage and

could allow higher density housing such as apartments which demand less land and can be more attractive and affordable to younger residents.

- the urban intensification growth strategy would make use of existing public transport links in and around Nottingham and Toton with the knock-on effect of reducing carbon emissions. The re-population of an urban area would make for a more sustainable development able to build on existing infrastructure.
- Dispersed growth should still help to meet demand but without the impact on the central/outskirts of Nottingham which are overdeveloped.

In terms of preferred broad locations for development, comments include preference for locations

- adjacent to the City as there is a reasonable probability of developing sustainable transport links to serve them
- in North Notts, the historic mining areas not in the rural areas such as between Orston and Elton.
- around Toton Hub and D2N2
- along the current and proposed tram routes to encourage use.
- within or adjoining the Nottingham Main Built Up Area with an emphasis on re-using brownfield land, followed by the delivery of urban extensions within or adjacent to Greater Nottingham (e.g. aligned to HS2).
- along the Beeston - Stapleford Tram Lane, the Clifton/Gotham Tram Line and Nottingham to Top Wighay Tramline.
- in Rushcliffe where supporting school and health infrastructure can be sustained.
- north of Bingham, consolidating with current developments, supermarket and new leisure centre.
- At Ratcliffe on Soar Power Station.

In terms of supporting evidence, the following points were noted: -

- the Growth Options Study is not fit for purpose. The accuracy of data in the study is, in many cases, inaccurate misleading and / or incorrect. As such, it would be inappropriate to comment on broad areas until this work is amended.
- figure 2.8 does not identify any development in Nottingham City which suggests no rigorous assessment has been undertaken, despite the large areas of space potentially available for housing development.

In terms of process, it was suggested that the consultation is neither user friendly or easy to digest for the average resident. Lip service is paid to consultation processes. One resident commented that the identification of growth options appears to be arbitrary with no local consultation. Another resident commented that they had only researched sites within own borough and was concerned by possible bias in this question as people will point towards a far away site to put pressure off their own local sites. One

resident noted that the borough boundaries used meant that certain areas were excluded that are close to Nottingham (e.g. Lowdham) while other areas are included that are further away (e.g. Little Eaton and Orston).

Many references were made to proximity to existing transport infrastructure, including sites with good transport links via the Robin Hood Railway Line for Newstead and Hucknall, sites that make use of the reasonable train service from Bingham to Nottingham and sites with good access to the M1, tramlines and the future HS2.

One resident commented that the Broad Areas of Search seem to focus on either an extension to the urban areas around the city of Nottingham itself; extensions to villages and market towns or development of new 'Garden Village' type sites. None of the areas suggested will be suitable if the essential infrastructure is not in place and the build quality is poor.

In terms of specific areas to be avoided, general reference was made to areas that cause coalescence between settlements or settlements and the city to ensure that the identities of individual settlements are preserved.

It was also noted that OS7 and OS8 do not acknowledge the two safeguarded land sites included in the Keyworth village plan for additional houses.

One resident suggested preferred areas for each Borough. The land East of Ilkeston and West of Nottingham with the M1 running through should be a major priority for housing for Broxtowe as well as in Beeston and the HS2 area. Rushcliffe should concentrate on the A453 corridor to take advantage of Nottingham, A52, Loughborough, EMA, EM Parkway, HS2, EM Segro and other Industrial sites and the M1 as well as links to Birmingham. Bingham should be expanded to make use of the A46 with also Industrial options. Gedling should increase the Hucknall zone, land from Gedling to Burton Joyce and around Arnold. Nottingham should now look to build upwards.

Another resident suggested that Gedling is the most disadvantaged as it is not on a major road route like the M1, A453, A610 or A46; there are not enough strong rail links and the borough is mainly used as a commuter area. It was suggested that Ravenshead should be connected to Newstead, using the park, lakes and having high class residential estates.

Site specific comments relating to Questions OS7, OS8 and OS9 are summarised after Chapter 10.

8. Question OS8: Other Growth Strategy Options

Do you think there are other growth strategy options which should be considered? If so, why?

Summarised comments from statutory organisations

Amber Valley Borough Council note that the potential locations identified in the 'Growth Options Study' which would be most likely to impact on Amber Valley residents are those within the northern part of Broxtowe Borough (the 'Brinsley Extension' and the 'Eastwood Extension'). However, within those areas there are only three potential sites that have been submitted to Broxtowe Borough Council and none of these would have any material impact on Amber Valley.

Barton in Fabis Parish Council does not consider that there are other growth strategy options, and refer to their response to question OS7.

Bradmore Parish Council does not support the inclusion of the Land East of Loughborough Road (R12.4) in the list of site locations.

Burton Joyce Parish Council comment that they have no such proposals at present other than those stated under OS7.

Chetwynd: The Toton and Chilwell Neighbourhood Forum note they have no comments on this question.

Gotham Parish Council does not consider that there are other growth strategy options, and refer to their response to question OS7.

Kingston on Soar Parish Council does not consider that there are other growth strategy options and refer to their response to question OS7.

Nottinghamshire Wildlife Trust suggested options likely to have least impact on wildlife are the conversion of existing buildings and structures; previously developed land; smaller sites in existing built areas; re-zoning existing built up land where appropriate. Need an up to date review of land uses in the City Centre and other principal urban areas, to reflect the decline of retail, switch to online shopping and increased home working.

Radcliffe on Trent Parish Council express a strong preference for 'Urban intensification', combined with a commitment to develop a green infrastructure network, preventing further degradation of the Green Belt by avoiding significant expansion of existing settlements and any new settlements in the surrounding countryside and support for major transport improvements, not only to the NET but crucially in the A52 corridor East of Nottingham.

Ratcliffe on Soar Parish Meeting does not consider that there are other growth strategy options, and refer to their response to question OS7.

Thrumpton Parish Meeting does not consider that there are other growth strategy options, and refer to their response to question OS7.

Urban Vision Enterprise on behalf of Linby Parish Council considers that the 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.

Summarised comments from developers

Andrew Hiorns Town Planning Limited on behalf of Parker Strategic Land Limited (site at Cotgrave) do not consider that there are other growth strategy options, and refer to their response to question OS7.

Andrew Hiorns Town Planning Limited on behalf of Parker Strategic Land Limited (Catstone Green site) does not consider that there are other growth strategy options but note that it is important that the actual extent of development area proposed is evaluated in the assessments.

Andrew Hiorns Town Planning Limited on behalf of Parker Strategic Land Limited (land south of Nottingham Road, Broxtowe) does not consider that there are other growth strategy options.

Barton Willmore on behalf of FH Farms Ltd note that the evidence base for the GNSP provides support for a Growth Area north of Bingham. It is more logical to have a wider Growth Area (including land south west of Car Colston) in this location than to locate a garden village between Orson and Elton (R05). This representation promotes a widened broad area for growth incorporating part of R03 but concentrated on an eastern extension towards Car Colston.

Boyer on behalf of Harworth Group agree that other options should be considered. Smaller scale but significant development must be considered at smaller “other settlements” that form satellites to the Nottingham urban area, where development can enhance the form and function of these settlements, achieving a critical mass to enable them to reach ‘key settlement’ status. We consider land north of Melton Road, Tollerton should be considered for allocation.

Boyer on behalf of Knightwood Developments Limited promote land south of A52, Whatton for commercial development.

Boyer on behalf of Stagfield Group agree that other options should be considered. Smaller scale but significant development must be considered at smaller “other settlements” that form satellites to the Nottingham urban

area, where development can enhance the form and function of these settlements. We consider East Bridgford to be a prime example and our clients are promoting a site adjoining this settlement.

Define on behalf of Bloor Homes suggest that in Erewash the growth strategy should also extend to include locations on the edge of Derby city that benefit from the same advantages as locations on the edge of Nottingham, in terms of ensuring the delivery of sustainable development and the connections to key movement and community infrastructure. The Locko Estate could be brought forward independently, or as part of a wider Strategic Urban Extension including the land west of Acorn Way (which Erewash Borough Council have already set out is a preferred allocation).

Endurance Estates propose an employment led development option on land off Nottingham Road, east of the A46 Stragglethorpe Junction, Cotgrave, totalling around 1,212,000 sq. ft. of development. Proposed uses include larger industrial units, smaller industrial units, offices for rural and farm related businesses, battery storage, E Point (EV) charging centre, Waste to Energy, and Agricultural Showrooms. There is capability to produce 1 Megawatt of on-site power for the onsite bio digester plant that could effectively be utilised within the EV Charging Centre and Battery Storage facility. The introduction of a new waste-to-energy power plant would be used both to supply the site and sold to the wider grid. The site is well located on the strategic highway network, can incorporate the increasing needs for more sustainable forms of power production and meet the emerging needs for EV charging facilities.

Fisher German LLP on behalf of Taylor Wimpey (Land at Chilwell Lane, Bramcote) proposes inclusion of land to the west of Chilwell Lane as part of the wider B09 potential area for strategic growth for the reasons set out in detailed representations.

Fisher German LLP on behalf of Landowner east of Mansfield Road, Eastwood supports the inclusion of land east of Mansfield Road within the B02: Eastwood Extension broad area of search. The land benefits from direct access onto Mansfield Road, one of the key routes into Eastwood. The landowner is content to work with neighbouring landowners to deliver appropriate west-east linkages which will assist in ensuring permeability and integrating the wider site with the existing settlement.

Fisher German LLP on behalf of Landowner north of Nuthall considers that the Council should consider positively the broad at Watnall (B04), and ensure any land allocated includes our clients land, particularly considering its lack of constraints and availability for development.

Geoffrey Prince Associates Ltd on behalf of Hammond Farms refers to broad areas G05.1, G05.2 and G07 and considers that the coverage of growth options is comprehensive, although there may be other detailed areas which require assessment at the next stage. They are concerned about the disparities between the conclusions of the SHLAA and the Growth

Options study, with sometimes reaching diametrically opposite conclusions (e.g. G5.1 and G5.2).

Gladman would support a combined approach to location of growth across the Greater Nottingham Area, in accordance with the NPPF and Guidance, proposing growth in settlements across the hierarchy, sustainable urban extensions and a new settlement. Provision of a wide-range of growth options, including the delivery of non-strategic sites, would support housing delivery at SUEs and new settlements ensuring that a five year supply of housing sites can be maintained across the entire plan period.

ID Planning on behalf of Mr John Breedon suggest that other 'Growth Strategy options' should include consideration of proportionate housing delivery in a variety of settlements and locations including Aslockton.

Marrons Planning on behalf of Braemore Group and Mr Knibb promote "Land at Wilford Road" as an appropriate site for new growth to include a sports facility for the local community and housing in a highly sustainable location. The loss of this land from the Green Belt would be of lesser detriment than other Green Belt release options in the vicinity, and would avoid coalescence with the Ruddington urban area due to the presence of Ruddington Grange Golf Course.

Marrons Planning on behalf of Crofts Development Ltd agree that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. They suggest a hybrid strategy with a range and choice of housing and employment sites; sustainable urban extensions adjacent to the urban area and expanded existing settlements. Crofts Developments Ltd is promoting 'land at Simkins Farm, Adbolton Lane' in West Bridgford which should be included within R07.1 (Regatta Way).

Marrons Planning on behalf of Mather Jamie Ltd agree that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. They suggest a hybrid strategy with a range and choice of housing and employment sites; sustainable urban extensions adjacent to the urban area and expanded existing settlements. Mather Jamie have interests in Land at Willow Brook, Keyworth and Owthorpe Lane, Kinoulton.

Marrons Planning on behalf of Davidsons Developments Ltd (Aslockton) agree that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. They suggest a hybrid strategy with a range and choice of housing and employment sites; sustainable urban extensions adjacent to the urban area and expanded existing settlements. Davidsons have an interest in land at Abbey Lane, Aslockton which as a small/medium site would help to support delivery.

Marrons Planning on behalf of Davidsons Developments Ltd (Land South of Gamston) agree that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. They suggest a hybrid strategy with a range and choice of housing and employment sites; sustainable urban extensions adjacent to the urban area and expanded existing settlements. Davidsons have an interest within R11.2 'North of Tollerton' in the northern area of R11 which would help to support growth in close proximity to the urban area and unlock the stalled strategic allocation.

Marrons Planning on behalf of Davidsons Developments Ltd (Cropwell Bishop interest) agree that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. They suggest a hybrid strategy with a range and choice of housing and employment sites; sustainable urban extensions adjacent to the urban area and expanded existing settlements. Davidsons have an interest in land north of Memorial Hall, Cropwell Bishop, which could come forward at an early stage and assist delivery.

Marrons Planning on behalf of Davidsons Developments Ltd (Gotham) agree that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. They suggest a hybrid strategy with a range and choice of housing and employment sites; sustainable urban extensions adjacent to the urban area and expanded existing settlements. Davidsons have an interest in land to the East of Gypsum Way, Gotham which could come forward at an early stage and assist delivery.

Marrons Planning on behalf of Harris Land Management agree that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. They suggest a hybrid strategy with a range and choice of housing and employment sites; sustainable urban extensions adjacent to the urban area and expanded existing settlements. It would be sensible to select a development strategy which included small and medium sites from the outset and Costock is well placed to be a broad location for non-strategic growth with Land at Leake Road allocated for development.

Nexus Planning on behalf of Mather Jamie Ltd notes that the Growth Options Consultation predominantly focuses on housing but supporting the GNPP area's economy to prosper is equally important. The GNPP growth strategy should take into account the need for and identify strategic employment site locations.

Oxalis Planning on behalf of John A Wells Ltd refer to three sites. The land west of Sharphill Wood, Edwalton is adjacent to the Edwalton SUE with

the A52 to the south serving as a defensible boundary and preventing encroachment into the countryside. The site could be developed as a large retirement village which is much needed in the area. The scheme would also bring forward significant benefits in the form of extensive publicly accessible open space and areas for biodiversity enhancement and a bespoke transport and access solution. The Langar Airfield site presents an opportunity to deliver a sustainable new garden village outside the green belt. The new village could be developed with its own character and identity with high sustainability aspirations, including a full range of services and facilities, significant areas of green infrastructure and improvements to public transport provision. John A Wells Ltd also have significant land interests on land located adjacent to the A46 south and east of Clipston Woods (part of site ref. R14 in the Greater Nottingham Growth Options Study). Whilst detailed development proposals have not been developed for the site it is considered that the land, together if necessary with adjacent land, could form a suitable location for a new settlement.

Oxalis Planning on behalf of W Westerman suggest that the GN Authorities should prepare a Strategic Plan which would prevent a repeat of the continuous shortfall across the Nottingham HMA and, as a minimum, plan to deliver more homes than the Standard Methodology. This approach should accommodate flexibility and, recognise proper and realistic delivery rates and rates of non-implementation. The strategy would then accord with emerging Government ambitions and requirements, as well as the housing needs for their area.

Pegasus on behalf of Hallam Land Management suggest that a new settlement should be considered as an option in isolation, not as part of a 'dispersed growth' option. None of the growth strategies highlighted in the document can meet the needs of the Greater Nottingham Area on its own. An urban capacity study should assess the capacity of the urban areas for growth without compromising the quality of life. The residual should be accommodated by expanding existing settlements and a new settlement based on garden village principles at R15.2 and R15.3.

Pegasus on behalf of Loughborough Road Consortium considers that land to the West of Loughborough Road provides a sustainable location for residential development. The site should be considered as part of R12 Ruddington Extension, the preferred area of search within the Growth Options Study. It could also be included as part of site R12.3 shown in Appendix 2 as a larger site 'East and West of Loughborough Road'.

Persimmon Homes promote two sites at Land off Nottingham Road, Giltbrook, Broxtowe and Colwick Loop Road, Burton Joyce, Gedling.

Q&Q Planning on behalf of Newton Nottingham LLP support a balanced growth strategy which recognised the need to support regeneration of the main urban area through additional development whilst focussing growth outside of the main urban area at a strategic location. Land at the former RAF Newton represents such a strategic location and should be prioritised due to its ability to accommodate a critical mass of new development, to

minimise impacts on the integrity of the Green Belt and to deliver a range of sustainability benefits.

Savills on behalf of Taylor Wimpey (Land North West of East Bridgford) consider that R01 East Bridgford should be strategic and hence considered in this plan.

Savills on behalf of Taylor Wimpey (Land East of Gamston) consider that R01 East Bridgford should be strategic and hence considered in this plan.

Savills on behalf of Taylor Wimpey (Land West of Ruddington) consider that R01 East Bridgford should be strategic and hence considered in this plan.

Woolbro Morris refers to broad area G01 and is supportive of growth occurring at Ravenshead but does not agree with the exclusion of a potential option for development occurring to the south of this settlement.

Summarised comments from local residents

A number of local residents commented to say that there were no other growth strategy options or they had no comment on this question.

In terms of the methodology used to date, one resident stated that the strategy is based off a report in 2010 and it is not clear how these sites were chosen over others. It was suggested that further analysis of broad areas of search is required. One resident expressed the view that a settlement based assessment of existing infrastructure would best inform decisions as to which settlements could accommodate growth. One resident queried whether account had been taken of the number of houses currently in planning or small developments that have taken place in recent years. A number of residents considered the Growth Options study was not fit for purpose, deeply flawed and should not take a 'policy off' approach to something as important as the Green Belt.

Other sources of supply/strategies

In terms of other sources of supply, reference was made to brownfield sites (vacant and otherwise) and empty manufacturing buildings as well as the refurbishment of existing properties that need it. One resident suggested that disused colliery land could be turned into new villages with their own community facilities and identity.

Several residents referred to land in Nottingham city centre. With the current changes in on line shopping and working from home, redundant shops and offices could be redeveloped for housing, assisting the regeneration of the city centre. This would have the added benefit of retaining the existing Green Belt and providing the opportunity to further intensify the growing of green crops and extending wooded areas.

A number of residents supported the development of new townships/Garden Villages. These could provide for a greater number of houses without undermining the character of the surrounding Villages and Market Towns of Nottinghamshire and should be used as an alternative to building around Sharphill Wood (e.g. R10).

Other residents support urban regeneration, which protects the greenbelt, maximises use of existing infrastructure, delivers houses close to the jobs and reduces the need to use cars; and consider that the Garden Village does the opposite of all these things.

One resident suggested either entirely new 'garden villages' or development of rural communities, but ensuring that space is left between these communities for wildlife to move around.

One resident suggested that an estate be built around where Rushcliffe Councillors live, which might change their views.

One resident suggested that sites R07.2 and R07.3 would be better developed as a Park and Ride as there is currently no facility or trams on this side of the city. This would reduce road traffic in the city and improve air quality.

In accordance with the NPPF, some residents promoted both housing and employment development on 'infill' sites.

Site specific comments relating to Questions OS7, OS8 and OS9 are summarised after Chapter 10.

9. Question OS9: Site Assessments

Do you prefer any of the sites at Appendix 2, and why?

Summarised comments from statutory organisations

Aslockton Parish Council's preferred sites are the ones located close to

- The City of Nottingham and its suburbs
- HS2 hub at Toton
- Ratcliffe on Soar Power Station

Amber Valley Borough Council comment that none of the sites submitted that are within the broad areas of search closest to Amber Valley are will have a material impact on Amber Valley (in terms of scale and location).

The Environment Agency state that for new sites in areas of flood risk, we'd expect to see a full and comprehensive flood risk sequential test carried out, and documented and published, as part of the plan making process.

Historic England do not provide comments on the sites listed in Appendix 2 but will continue to engage with the Plan process and any preferred sites that emerge as the Plan progresses. We recommend that any site assessment follows the five steps set out in our advice note HEAN 3.

Homes England request that careful consideration is given to how any future growth is distributed being mindful of sites that have already been allocated in Local Plans and where there is already an expectation of housing delivery.

Linby Parish Council note that the consultation document includes 2 potential sites for allocation in the parish in addition to the existing strategic allocation at Top Wighay. AECOM identifies these as amber 'potentially suitable'. Infrastructure is insufficient to support further growth and Linby Parish has already taken a significant level of growth in the past 5 years. Green rated sites comprise 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.

Natural England does not have a particular preference for any of the sites but would wish to ensure that the chosen allocations would result in no adverse impact on any designated nature conservation sites or protected landscapes. Housing development should avoid Best & Most Versatile Land where possible. The Impact Risk Zones (IRZs) for each potential site should be considered. IRZs are a GIS tool developed by Natural England to make an initial assessment of the potential risks posed by development proposals

to protected sites, including SSSIs. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Any proposal for development should include sufficient information to demonstrate that any potential impacts to the SSSI have been adequately avoided or mitigated using appropriate measures and safeguards. The impact of potential sites on the Sherwood possible potential Special Protection Area (ppSPA) should also be considered and Natural England's Advice note followed.

Nottinghamshire Wildlife Trust are concerned about the sheer number of and unsuitability of many sites of the sites listed at Appendix 2 and provide site specific comments in terms of biodiversity impacts.

Papplewick Parish Council consider that it is likely that of the housing options considered, the southern section of G01, G04 and the northern and western parts of G05 would result in increased traffic through the village.

Radcliffe on Trent Parish Council prefer B09 and R15 as both are close to the regeneration area of Ratcliffe Power Station thereby nearer those areas where 'new' jobs are planned so reducing commuting time, traffic levels and energy and also nearer to tram and rail links.

Ravenshead Parish Council commented that many of the sites indicated in Appendix Two were not well enough known, in terms of their sustainability, to voice an opinion or preference.

Severn Trent Sewerage Management comment that to provide any guidance regarding any of the sites within Appendix 2 they would require additional information regarding housing numbers, and employment floorspace to assess the impact on our sewer networks.

Sport England objects to the following potential allocations: -

- Rushcliffe Centre - R07.1 Regatta Way – consideration will need to be given to the loss of playing field.
- Rushcliffe East - R03.2 Bingham extension – consideration will need to be given to the adjacent Butts Field sports ground. Sport England also object to the loss of the following sites. Appropriate, evidence of impact, justification and mitigation for the loss will be required.
- Gedling North - G06.2 & 3 Ramsdale Park Golf Centre
- Rushcliffe Centre - R11.1 Edwalton Golf Centre
- Rushcliffe East - R09.1 Langar airfield which may have regional significance for skydiving.

Saxondale Parish Meeting have no direct preference, although B09 and R15 have the advantage of developments around proposed major transport hubs, thus improving travel and reducing pollution potential.

Thrumpton Parish Council refer to their response to question OS7.

Woodborough Parish Council do not express a preference for any of the sites, but would wish to emphasise that development within a small village with limited resources and facilities would not be preferable. G08 is unsuitable for housing development.

Summarised comments from developers

Andrew Hiorns Town Planning Limited on behalf of Parker Strategic Land Limited prefer site B08.3 and those alongside to the north that comprise sites B08.1, B08.2, B08.4 and B08.7, which comprise the Catstone Green site.

Andrew Hiorns Town Planning Limited on behalf of Parker Strategic Land Limited prefers sites **B08.1, B08.2, B08.4 and B08.7**, which comprise the Catstone Green site. Site B08.4 includes the Broad Oak Farm Scheduled Monument and that land is not proposed for development and so should be excluded. There is potential for the Urban Extension to also be developed on land to the south of Nottingham Road at site B08.3 which is the subject of a separate submission.

Avison Young on behalf of Homes England and the Defence Infrastructure notes that the AECOM study identifies two sites at Toton as potential options - B09.1 Land at Hill Top Farm Stapleford; and B09.2 Land East of Toton Lane, close to the north of Chetwynd Barracks and the strategic growth site at Toton. Homes England and DIO request that priority being given to ensuring delivery of sites that have already been allocated in Local Plans, and where there is already an expectation of housing coming forward, such as Chetwynd Barracks.

Bidwells on behalf of Trinity College support the identification of New Farm, Redhill, which comprises sites ref G05.1 'Land to the west of the A60, Redhill' and G05.2 'Land to the north of Bestwood Lodge Drive', for allocation in the Greater Nottingham Strategic Plan. New Farm, Redhill represents a highly sustainable site which should be viewed favourably as part of any Green Belt Review. Due to the scale of this potential allocation, opportunities for the provision of infrastructure needs could be made on site including new schools, health care provision and retail units, as well as provision for on-site employment uses. However, as the site is located adjacent to Nottingham city there will also be opportunities to make use of existing infrastructure provision in the wider surrounding area, whilst ensuring the development remains sustainable. Technical work has been undertaken to support the identification of this site as an allocation which demonstrate that the site is deliverable and achievable.

Boyer on behalf of Strawsons Group Investments Ltd support the identification of Site B07.1 at Trowell as a preferred location for development. Strawson Group Investments Ltd have an interest in land east of Cossall Road, Trowell on the basis of the potential of this location for both sustainable development and beneficial change. A more limited site is proposed which is in a single ownership and would yield 500 dwellings.

Carter Jonas on behalf of Burhill Group Limited prefer G06.2 and G06.3 'Ramsdale Park Golf Club Sites A and B'. Calverton is recognised as a "key settlement for growth" within the Aligned Core Strategy and the Site is a logical extension to the village. The Site is under single ownership and is deliverable in accordance with the NPPF.

D2H Land Planning Development Ltd promote a 5 ha site to the south of Ravenshead, bounded by the playing pitches to the north, properties on Kighill Lane to the east, Kighill Lane to the south and a hedgerow parallel to the A60 to the west. The site is grade 3 agricultural land and could deliver 150 homes.

Fisher German LLP on behalf of The Trustees of the Locko 1991 Settlement commented that the identification of E6 East of Derby is fully supported for the reasons set out (see comment for this site within Erewash).

Geoff Prince Associates Ltd on behalf of Langridge Homes Ltd have reservations about including the following sites as potential growth areas:

- G03 Top Wighay Farm (G3.01 and G3.02) is a strategic allocation in the adopted ACS and was first allocated in the 2005 Gedling Local Plan. The site has failed to come forward for development.
- G05 Land at Redhill (G5.1 and G5.2) site extends to the wider countryside beyond Leapool Island. The 2019 SHLAA concluded that the site (ref 6/1130) is not deliverable and not developable.
- G06 Calverton Extension (G6.1 and G6.2) does not adjoin the built-up area of Calverton and the SHLAA has concluded that these sites are not developable.

Geoff Prince Associates Ltd on behalf of Hammond Farms have reservations about including the following sites as potential growth areas: -

- G03 Top Wighay Farm (G3.01 and G3.02) is a strategic allocation in the adopted ACS and was first allocated in the 2005 Gedling Local Plan. The site has failed to come forward for development. The problems with the site include the costs of upfront infrastructure and also environmental issues. Development at Top Wighay is also opposed by Ashfield Borough Council. The bulk of Gedling's population live in Arnold and Carlton and this is where more homes are needed.
- G05 Land at Redhill (G5.1 and G5.2) site extends to the wider countryside beyond Leapool Island. The 2019 SHLAA concluded that the site (ref 6/1130) is not deliverable and not developable. Langridge Homes have previously investigated the site but concluded that constraints that impact on scheme viability include topography, landscape, surface water drainage, the presence of a high pressure national gas pipeline which traverses the site from north to south, access from Mansfield Road and the width and capacity of Bestwood Lodge Drive.

Gladman note that the sites within Appendix 2 consist of broad area growth options with only high-level analysis provided currently, but all should be subject to the same detailed assessment to ensure that all options are fully assessed and to justify sustainable and appropriate spatial strategy for the emerging Plan. Strategic allocations and broad locations of growth should be supported by a range of smaller sites across the settlement hierarchy to ensure the housing needs are met in full over the entire plan period. Two sites are promoted - one at Stonebridge Drive, East Leake and one at Landcroft Lane, Sutton Bonington.

JW Planning Ltd on behalf of Hall Construction Services Ltd support the identification of 'Awsorth Extension' (Site Ref: BO6) as a 'Potential Area of Strategic Growth' (Village Expansion). No constraints exist across the northern part of the PASG where Hall Construction Services Ltd have control over a site extending to circa 32ha which is fully deliverable.

nineteen47 on behalf of Richborough Estates support the identification of land off Oxton Road, ref G06.1, which is considered preferable to either Ramsdale Park Golf Centre Site A or Site B within the wider Calverton Extension broad area of search.

Oxalis Planning on behalf of Bloor Homes Midlands consider that the land northeast of Toton (BS9) has several key attributes which would enable the area to deliver sustainable development. Indeed, the development of the HS2 Hub Station is referenced throughout the Growth Options document and Aecom Study. The attributes of northeast of Toton include:

- There is existing infrastructure in place to support development;
- The area can link to excellent public transport services including the tram;
- The area can integrate with the existing urban area of Nottingham;
- The area will link with the planned growth at the HS2 Hub Station;
- The area can deliver significant areas of new green space, for recreation and biodiversity enhancement;
- There are no environmental sensitivities to prevent development.

Oxalis Planning on behalf of South West Nottingham Consortium notes that the South West Nottingham area scores highly in the AECOM assessment. The site forms part of the A453 corridor (ref. R15) broad area which has a high potential for strategic growth, with potential to be served by East Midlands Parkway. The east of the A453 site (Ref R15.1) is suitable for development. These conclusions are supported and land to the east of the A453 should be progressed for development.

Oxalis Planning and Boyer Planning on behalf of W Westerman Ltd and Strawsons suggest that to meet the needs of Greater Nottingham, new development sites outside the existing urban area will be required. Sites which deliver the most sustainable development should be progressed. That could be new settlements, urban extensions, or smaller scale development in villages or, most likely, a combination of all. Given the tightly drawn Green Belt boundary around Greater Nottingham, this would almost certainly mean

the development of land currently identified as Green Belt if the most sustainable development strategy is to be taken forward.

Oxalis Planning on behalf of unnamed landowners and developers

suggest the strategy should include the delivery of a new community on land East of Toton Lane and new communities on land East of the A453 between Clifton and Ratcliffe Power Station. Both these sites are identified within the Aecom Study as 'suitable' for development and form part of broad areas which have a 'high potential' for strategic growth. (A detailed submission is made separately on behalf of a consortium of landowners which sets out the specific proposals for and benefits of the development of this area).

Oxalis Planning on behalf of Richard Taylor consider that the opportunities and benefits presented by the HS2 Hub Station at Toton are referenced throughout the Growth Options Document. The Northeast of Toton broad area (ref. B09) includes land at Hill Top Farm (ref. B09.1) and east of Toton Lane (ref. B09.2) and is identified in the Aecom Study as having a high potential for strategic growth. As identified by the Aecom Study, the Hill Top Farm site (ref. B09.1) already benefits from excellent bus and tram services, which would be further improved by the HS2 Hub Station. The site is well related to the urban area and the A52 to the east would prevent development coalescing with Chilwell. There are opportunities for new, publicly accessible open space and extensive new landscaping. The potential for integration with and links to a wider development of the land east of Toton Lane should be explored.

Pegasus Group on behalf of Nottinghamshire County Council support the proposal for the strategic allocation of Top Wighay Farm (site references G03.1 and G03.2) as a preferred site for housing development in Gedling Borough. This strategic site is considered to be suitable for development, achievable and deliverable. Both Hallam Land Management and Nottinghamshire County Council are committed in bringing the site forward for development at the earliest opportunity, and there are no technical reasons which prevent the site from being allocated for development in the Greater Nottingham Strategic Plan. The site would contribute significantly to the housing need in Gedling Borough over the plan period, delivering a minimum of 1,700 new homes in a sustainable location.

Planning and Design Group (UK) Limited on behalf of The Trustees for the Estate of Mrs Joan Winifred Briggs prefers site B08.3 but the site should be extended to include land at Chantry House, to the south unless this land is considered separately. The site does not fulfil the purposes of the Green Belt and is as well positioned to deliver sustainable development as land to the south (allocate land west of Coventry Lane). A strategic Green Belt Review is absolutely critical to informing a robust Strategic Plan. Sustainable sites have been missed from the current Growth Options Assessment. The existing Green Belt designation has led to a disproportionate amount of land having been developed in locations which are less sustainable outside of the Green Belt.

Savills on behalf of Wilson Bowden Developments (Land at New Farm, Nuthall) understand that Land at New Farm, Nuthall comprises land parcel B05 but does not feature in Appendix 2 due to the Study's focus on housing rather than employment options which has disadvantaged the site. In light of the inconsistency between Figure 2.8 and Appendix 2; the need for further employment land during the plan period; the introduction of the HS2 line; the history of Green Belt releases to meet identified needs in this location and the conclusions drawn from the highways, flooding and ecology reports, WBD request that this site is released from the Green Belt and brought forward as a sustainably located employment site.

Savills on behalf of Gaintame support site BO5.2 (Land South of Nottingham Road, Nuthall) and site BO8.6 (Land West of Woodhouse Way) because they are considered to be highly suitable for employment land development. The two sites are located approximately 1km apart and share excellent access to the M1 and A6002 and are also a short journey from Toton where the new HS2 hub will be located.

Savills UK Ltd on behalf of Mr C Nott consider that site B02.2 represents an attractive and deliverable location for the growth of Eastwood. It offers a coherent block of land enclosed by the existing road network and well related to existing adjacent land uses. It is well located for the facilities in Moorgreen such as the public house and garden centre. The Moorgreen Industrial Park and other employment uses are located on Engine Lane which adjoins B02.2 on its north western boundary. The site is immediately adjacent to existing housing estates in Eastwood/Newthorpe. B02.2 therefore presents an excellent and sustainable option for growth in Broxtowe and is unique in providing employment opportunities in immediate proximity to the site.

Savills on behalf of Rushcliffe Borough Council consider that local authorities should seek to allocate a mix of small / medium sites and strategic sites to ensure that housing and necessary infrastructure is delivered both quickly and in the numbers required to address the identified need.

Savills on behalf of Wilson Bowden Developments (Land West of Woodhouse Way) prefer Site B08.6 (Land West of Woodhouse Way) as it is considered to be highly suitable for employment land and, in particular, the accommodation of businesses being displaced at Nottingham Business Park by HS2. The two sites are located adjacent to one another and share excellent access to the M1 and A6002 and are also a short journey from Toton where the new HS2 hub will be located.

Shouler & Son on behalf of Knights plc support site B.04, Common Lane, Watnall, as a 'Potential Area for Strategic Growth'. It is important to maintain the physical separation of the built-up area of Nottingham from Watnall and Kimberley. This is achieved by the M1 and in the future HS2. The site would provide a mix of housing, employment space and green infrastructure. From east to west, this would result in a sequence of motorway, green space/landscaping, housing/green space and employment, with the latter

adding to that which already exists. The locational and environmental characteristics of the B.04 area are sufficient to justify an enhancement in its status to an area with a 'High Potential for Strategic Growth'.

Star Planning on behalf of Woolbro Morris is supportive of growth occurring at Ravenshead but does not agree with the exclusion of a potential option for development occurring to the south of this settlement.

Stone Planning Services note that their clients own land to the east of Toton Lane, to the north and south of the NET car park and terminus site. Our comments relate to site B09.2 - land east of Toton Lane. Two areas have been excluded - the Japanese Water Garden site and Bardills Garden Centre. Removing these two areas from the green belt as part of the review would encourage comprehensive development. Neither site fulfils any of the 5 principles for including land within the green belt. We suggest that the Bardills Garden Centre and Japanese Water Garden sites should either be included within Site B09.2 or form part of the existing Strategic Location for Growth at Toton (Policy 3.2).

William Davis are undertaking their own assessments of potential development sites in the Greater Nottingham area which has identified several potential opportunities. While a number of these are located within the areas identified in the Growth Options Study some are in other locations.

Summarised comments from other organisations

British Gypsum object to a number of sites in Rushcliffe due to the potential sterilization of permitted gypsum reserves in these areas, potential risk of land instability due to siting of historic mining infrastructure, sterilization of potential future mining reserves (those areas not permitted but still of importance due to national scarcity and protected by Minerals LP).

Carlton and Gedling U3A stated that consultation on this issue is not fit for purpose as is not capable of generating informed comments and precludes the possibility of meaningful consultation (OS9).

Home Builders Federation has no preference for any of the sites listed in Appendix 2 but the correct assessment of availability, suitability, deliverability, developability and viability of these sites is critical. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small local, medium regional and large national housebuilding companies and optimise housing delivery. Under the 2019 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target

Keyworth Conservation Area Advisory Group note B05, B08, B09 and G07 do not impact significantly into the Greenbelt.

Nottinghamshire Campaign to Protect Rural England consider the following sites are unsuitable for development due one or more of the

following factors: local amenity value; landscape value and sensitivity; risk of coalescence; a Green Belt or remote location: -
in Broxtowe: B02.2; B09.1; B09.2; B08.1- B08.4; B08.7
in Gedling: G04.1; G05.2; G06.2; G07.2
in Rushcliffe: R02.2; R03.2; R06.2; R09.1; R014.1; R015.3

Planning & Design Group (UK) Limited on behalf of the University of Nottingham consider that site B09.2 must be expanded, or land identified separately to include land west of Bramcote (see accompanying plan). This area to the north east of B09.2 is equally well positioned to deliver sustainable development, as described in responses above. Additional information and material is to be submitted beyond this consultation to support the capabilities of this site to come forward.

RBC Leake Ward Members do not comment on sites outside Rushcliffe. Rushcliffe is the area least well connected to Nottingham (due to the congested river crossings) and that it has taken a disproportionate share of growth for the greater Nottingham area. Growth in other areas of greater Nottingham should now be prioritised. Given the amount of land identified elsewhere we are hoping that few or no strategic sites will be allocated in Rushcliffe. Some green belt release and safeguarded land is needed around Cotgrave, Keyworth and Radcliffe on Trent, to allow them to expand at the same sort of rate as Bingham and East Leake which lie outside the green belt. Areas around Ruddington need protection to prevent coalescence with Clifton, West Bridgford and Bradmore, but taking this as a constraint, there may be scope for some release or safeguard of land in other directions. Smaller settlements in the green belt should also have some land released and/or safeguarded to allow growth, including Tollerton, Cropwell Bishop, East Bridgford, Bradmore, Bunny, Cropwell Butler, Newton, Plumtree, Shelford, Upper Saxondale. Any expansion and green belt release at Gotham would need to be planned to maintain good separation from Fairham Pastures, further development along the A453 if applicable (R15.1), and East Leake.

Tollerton Against Backdoor Urbanisation (TABU) prefer areas north of the river due to the inadequate river crossing capacity. Areas with good transport infrastructure are preferred, e.g. Toton, Nuthall and Trowell. Areas south of the river are to be avoided, but preferred areas south of the river are near the M1 and Nottingham Parkway Station (Gotham) and areas near the A46 (Bingham, Radcliffe on Trent). Sites within or adjacent to villages should be avoided.

Summarised comments from local residents

One resident suggests that the map of sites R12.3 and R12.4 have been wrongly labelled in the GNSCO.

In terms of general comments from local residents, many referred to the loss of Green Belt. It was suggested that the Councils should regenerate and build on urban and brownfield sites rather than build on green land and that all Green Belt sites should be removed from consideration. Other

suggestions included small scale infill development and doing up run-down houses.

Several residents noted that Green Belt boundaries had changed through recently adopted local plans and such changes are meant to be exceptional.

Current building is sufficient to cover the demand for housing.

In terms of the preferred locations for new development, some preferred sites that are contiguous with existing settlements but do not fill in gaps to neighbouring ones. Others preferred land inside the ring road. Others preferred areas with the supporting infrastructure already in place (Bestwood Country Park, Lambley Lane, Burton Joyce/Glebe Farm). One resident promoted an approach that allocated safeguarded land in Gedling Borough at Top Wighay Farm and Calverton first, and then considered Green Belt land to the east or west of the A60, recognising that the two safeguarded sites would not assist the Council's Five Year Land Supply.

It was recognised that sites close to existing urban areas are more likely to benefit from existing infrastructure and good public transport links.

In terms of supporting evidence: -

- There appears to be no proper analysis for loss of Green Belt land and the resulting environmental and amenity impact of that.
- Similarly, there seems to be no analysis of the quality of the agricultural land that would be lost and its impact on food production in the post-Brexit world.
- Growth Options study is inaccurate, misleading and / or incorrect and should not take a 'policy off' approach to something as important as the Green Belt.
- A detailed assessment should be undertaken of available brownfield land.

Regarding process, it was suggested that the identification of growth options appears to be arbitrary with no local consultation, this will also create an expectation on which land should be used without proper consideration. Recognising that there is an increasing climate emergency, it remains essential that proposals are appropriate to the areas designated for consideration and fulfil criteria for improvement, not just economic, but environmental. The ability of local people to shape their surroundings should not be dismissed. One resident asked why they were not made aware of the proposals for Orston when they purchased their house a year ago.

In terms of the delivery of supporting infrastructure, it was requested that better roads are completed at the same time. Many of the development sites are in suburbs, and better busses into the city centre won't help those who don't work and shop in the centre. Residents also commented on the lack of imagination in terms of design and the affordability recent housing developments.

Whilst many residents acknowledged the need to provide new housing, there were specific objections in those areas where residents felt a lot of development had already taken place, e.g. Calverton and Ruddington.

In the Strategic Plan there is a lack of information or definition of what a Garden Village is or of its strategic importance. The purpose of a Garden Village has not been described at all in the Strategic Report making it difficult to comment on constructively.

10. **Question OS10: Safeguarded Land**

Should this Plan designate Safeguarded Land within the Green Belt? If so, where?

Summarised comments from statutory organisations

Barton in Fabis Parish Council disagree with the designation of safeguarded land and suggest that research be undertaken to look at all available land within the Nottingham conurbation, including brownfield land, before any land is released from the Green Belt, in accordance with the NPPF.

Bradmore Parish Council do not express any view about whether this Plan should in principle designate Safeguarded Land within the Green Belt, or not.

Burton Joyce Parish Council disagrees that the plan should designate safeguarded land. The Green Belt is under enough threat as it is, and further loss is unnecessary if the Urban Intensification Growth Strategy is followed. "Safeguarded Land" is a temporary reprieve from total loss, with its main effect being a windfall price benefit to landowners and an incentive to future damaging loss for reasons that cannot be securely predicted.

Chetwynd: The Toton and Chilwell Neighbourhood Forum comments that the amount of safeguarded green space should be sufficient to meet the per capita green space requirements (as indicated in the Chetwynd: Toton & Chilwell Neighbourhood Forum Neighbourhood Plan). This green space can be a combination of Green Belt and designated other areas. However, the amount of green space provided within the safeguarded land should be more than sufficient to meet the needs of adjacent populations who have come to depend on this green space for recreation etc., and also to protect wildlife from urban sprawl.

Gotham Parish Council disagree with the designation of safeguarded land and suggest research should be undertaken to look at all available land within the Nottingham conurbation, including brownfield land, before any land should be released from the Green Belt, in accordance with the NPPF.

Holme Pierrepont and Gamston Parish Council consider that green belt should not be released unless exceptional circumstances are demonstrated. The NPPF states green belt policy is important. Evidence needs to justify any release. Two key characteristics of the land on the eastern fringes of Nottingham are their openness and permanence. Any release of land needs to ensure there is a strong defensible boundary to prevent coalescence.

Kingston on Soar Parish Council suggest that research should be undertaken to look at all available land within the Nottingham conurbation, including brownfield land, before any land should be released from the Green Belt. It is clear from paragraph 136 of the NPPF that Green Belt

boundaries should only be amended in exceptional circumstances, having regard to their intended permanence.

Papplewick Parish Council is opposed to the concept of land safeguarded for future development as decisions made now, based on prevailing evidence, are then acted out long in the future. The missing element is the need to safeguard land, especially high grade agricultural and horticultural land, for food production. The area north of Nottingham is long established as producing veg and perishable crops close to market and providing higher rates of employment.

Radcliffe on Trent Parish Council suggest that safeguarding may be applicable in the future if agreement were obtained for a link road from the A46 to the A52

Ravenshead Parish Council notes that land 'safeguarded' for future development should in principle be a first port of call when reviewing the plan and all other allocated sites have been developed or discarded. However, this should be on the basis of a further comprehensive review.

Ratcliffe on Soar Parish Meeting suggest research should be undertaken to look at all available land within the Nottingham conurbation, including brownfield land, before any land should be released from the Green Belt. In accordance with the NPPF.

Ruddington Parish Council state that land between settlements should be safeguarded from development.

Saxondale Parish Meeting state that safeguarding is important across three local areas. Saxondale, which provides a natural break between urban developments and land around any future potential transport links or existing road expansion (A52, A46, Future park and ride, tram extension, etc.)

Tollerton Parish Council note that in Rushcliffe our neighbouring communities have had planning permission given on appeal for land not allocated in their neighbourhood plans despite the agreed preference of local residents for alternative sites. Any and all green belt land for development in Rushcliffe should be safeguarded until allocated through the Local and Neighbourhood Plans.

Urban Vision Enterprise on behalf of Linby Parish Council considers that the development of green-belt land or safeguarded land should not be prioritised for new development in this plan. The AECOM report notes there is sufficient land to meet housing and employment need. The Top Wighay safeguarded land should be returned to the green belt. The AECOM report notes for Gedling North that there is a lack of infrastructure, limited demand for new homes and the existing road infrastructure is at capacity. An extension to the strategic site would also be contrary to national planning policy of making effective use of land and prioritising previously developed land.

Summarised comments from developers

Andrew Hiorns Planning on behalf of

- **Mather Jamie**
- **Parker Strategic Land Limited**

agree that the Plan should allocate the land necessary to achieve the growth requirements and should determine firm new boundaries for the Green Belt in the Plan.

Avison Young on behalf of Jelson Homes and the Wheatcroft Family

note that sufficient land will need to be allocated to meet housing need for the plan to be found sound and the need figure is a minimum. The land at Hall Farm should be allocated for development, rather than safeguarded.

Barratt David Wilson Homes agree that provision for safeguarded land should be made to cater for longer term needs and this should follow a Strategic Green Belt Review and detailed boundary assessments via part 2 local plans, with appropriate locations designated around the Nottingham PUA, main towns and rural key settlements accordingly.

Bidwells on behalf of Trinity College suggested that, in certain cases, Green Belt land can be safeguarded to meet future growth requirements if other sites, including those that may be released from the Green Belt do not come forward. However, land should not be safeguarded if it is required to meet the housing need within the plan period.

Boyer on behalf of

- **Harworth Group**
- **Stagfield Group**
- **Strawsons Group Investments Ltd**

support the principle of safeguarding land within the Green Belt for future development within the terms set out in the NPPF. The location of land to be safeguarded should be determined on the basis of Green Belt review and spatial strategy considerations outlined in answer to previous questions.

Carter Jonas on behalf of Burhill Group Ltd consider safeguarding land to be necessary given the Greater Nottingham Area's growth projections and in accordance with the NPPF. It will ensure that the increased need proposed through the Planning White Paper (396 dpa) can be met. It would prevent the over-development of existing towns and would enable the planning and co-ordination of delivery of supporting infrastructure.

Define on behalf of Bloor Homes agree that, to accord with the NPPF, the GNSP should include safeguarded land to accommodate development needs beyond the plan period. The process of identifying the land to be safeguarded should be undertaken as an extension to the site allocation process once the growth strategy has been defined.

Fisher German LLP on behalf of

- **Joanna Sztejer**

- **Mr Malcolm Hodgkinson**
- **Samworth Farms**
- **Taylor Wimpey (Land at Chilwell Lane, Bramcote)**
- **The Trustees of the Locko 1991 Settlement**

consider safeguarded land to be a proactive and positive step, to ensure flexibility and negate future Green Belt reviews. Clearly Green Belt is a significant barrier to growth, so including safeguarded land outside of the Green Belt allows the Councils to act quickly in the event of either increased housing demand or if housing is delivered at rates slower than expected. Safeguarded land should not replace the need to allocate circa 15% above housing need, to ensure deliverability, robustness and to boost significantly the supply of housing.

Geoff Prince Associates on behalf of Hammond Farms and Langridge Homes Ltd agree with the designation of safeguarded land, in accordance with the NPPF and noted that, given the emotive nature of Green Belt Reviews, safeguarded land should be identified for development well beyond 2038. This would also provide flexibility in case some growth option sites do not come forward.

Gladman consider the provision of safeguarded land should be justified through the appropriate evidence base and assessments. Where exceptional circumstances and future need can be demonstrated then it would be prudent to include safeguarded land in sustainable locations for future iterations of the Plan.

JW Planning Ltd on behalf of Hall Construction Services Ltd note that if the detailed housing needs assessment concludes that it would be pertinent to allocate safeguarded land, then the Erewash/Broxtowe North 'Broad Area of Search' would be the preferred location.

Marrons Planning on behalf of

- **Harris Land Management**
- **Crofts Development Ltd**
- **Whitefields Farm (Mr and Mrs Hammond)**
- **Davidsons Developments Ltd**
- **Mather Jamie Ltd**

consider it is unlikely that all development needs can be met within the main urban areas, and locations within and / or beyond the Green Belt need to be considered. Land that is appropriate for development but not made available now should be designated as 'Safeguarded Land'.

Nexus Planning on behalf of CEG Land Promotions (UK) Ltd supports safeguarded land in accordance with the NPPF. Safeguarded land should be focused around key sustainable settlements within the GNSP area, including Keyworth, Rushcliffe. It should take the form of both strategic sites and smaller scale sites that can be defined through the Local Plan or Neighbourhood Plan processes.

Nineteen47 on behalf of Richborough Estates agree that safeguarded land should be identified in locations which are suitable for growth, but not necessarily required to ensure that development requirements can be met within the plan period. This should be informed by a detailed and robust assessment of the Green Belt, looking at all sites which do not provide a meaningful contribution towards the purposes of the Green Belt.

Oxalis Planning and Bower Planning on behalf of W Westerman Ltd and Strawsons Property support the principle of safeguarding land within the green belt for future development within the terms set out in the NPPF. The location of land to be safeguarded should be determined on the basis of a Green Belt review and the spatial strategy considerations we have outlined above.

Persimmon Homes suggest that land released from Greenbelt but safeguarded enables housing shortfalls to be met promptly without the need to undertake further Greenbelt reviews. When undertaking Greenbelt reviews the revised Greenbelt boundary should be drawn at a point where the functionality of Greenbelt is served. In some cases, this will mean a sizeable area of land is released which may exceed the current plan housing requirement. Safeguarding policies enable Councils to control when additional land comes forward for development.

Richard Ling & Associates on behalf of Mr and Mrs Myles agree that safeguarded land should be identified particularly if there is a clear and defensible Green Belt boundary line nearby. The capacity for housing on my client's site is below the strategic parameters of your plan but there is a need for the Strategic Plan to define the inner Green Belt boundary (as happened in the Part 1 Rushcliffe Local Plan) in a comprehensive and coordinated way across the areas and jurisdictions of four Councils. The Green Belt is a strategic planning policy and needs to be addressed strategically.

Savills on behalf of Rushcliffe Borough Council are promoting land at Edwalton Golf Course for development, which includes existing safeguarded land. It is agreed that land should be safeguarded within the Green Belt but that this should be reserved for sites which cannot be delivered in the immediate future. This may include golf course land that may be retained in the future and other wider opportunities such as land associated with the proposed route for HS2.

Savills on behalf of Taylor Wimpey Ltd support the principle of safeguarded land. However, it is too early into the evidence gathering and consideration of options to be able to answer this. We request that the Strategic Plan leads on growth targets and if amendments are required to the Green Belt.

Savills on behalf of Wilson Bowden Developments agree that safeguarded land should be identified but sites which may not be delivered as quickly should be safeguarded. Sites such as Woodhouse Way can be delivered within 3 – 5 years so should be allocated within the Strategic Plan to assist the Council's in meeting the current cumulative shortfall.

Additionally, safeguarded land required by HS2 for construction could be a suitable for development post completion of HS2 so this should be a consideration in the Strategic Plan.

Star Planning noted that in accordance with paragraph 139 of the Framework, safeguarded land should be excluded from the Green Belt to meet longer-term development needs stretching well beyond the plan period.

Stone Planning Services on behalf of Aldergate Properties Ltd support the designation of safeguarded land and note that this approach was taken by Gedling but not Broxtowe or Rushcliffe in their part 2 local plans. Safeguarded land provides a safety net to overcome the difficulty of bringing sites forward where sustainable settlements are heavily constrained by green belt.

The Planning and Design Group on behalf of The Trustees for the Estate of Mrs Joan Winifred Briggs recommended that if land at Chantry House, Coventry Lane and west of Bramcote is not allocated within the Strategic Plan then it should be designated as Safeguarded Land for longer term development.

Turley on behalf of IM Land state that the role of safeguarded land is not just to ensure that Green Belt boundaries are enduring, but also to provide a 'contingency' of land in sustainable locations, outside the Green Belt, which can come forward for development to meet housing needs. Given the timescales for existing strategic sites and that a large extent of the plan area is covered by Green Belt, it would be prudent for the GNSP to identify safeguarded land to provide a safety net for the plan should there be any delays in the delivery of allocated sites.

Wood PLC on behalf of the Crown Estate comment that given the complex nature of the Greater Nottingham area there seems little advantage in safeguarding land, effectively over two iterations of the Strategic Plan. We are not convinced that safeguarded land is required, or to what extent, given that the scale of growth is not yet known, the existing commitments and large opportunities at sustainable locations such as Bingham outside the Green Belt. More evidence will be required on this matter to justify release.

William Davis noted that safeguarded land may be appropriate in some case, but a preferred option would be to designate 'Reserve Sites', so there would not need to be a review of the Local Plan in order for them to come forward.

Summarised comments from other organisations

Burton Joyce Climate Change Action Group state that the Green Belt shouldn't be developed. Development should be near to areas where there is already public transport and other amenities.

Carlton and Gedling U3A seek the protection of all Green Belt Land, rather than merely 'safeguarded' (i.e. protected for the time being).

Diocese of Southwell and Nottingham comment that all land should be retained in green belt.

Defence Infrastructure Organisation (MOD) comment that, given the pressing development needs for the Greater Nottingham area and to avoid having to undertake more regular Green Belt reviews we are supportive of a plan that safeguards suitable land. Newton Airfield is considered suitable for development and should be allocated for development within the Plan period, but if this is not the case then consideration should be given to safeguarding Newton Airfield.

Edwalton Municipal Golf and Social Club note there is a need for recreational facilities as well as housing. Reference is made to the ecological value of the golf course, that it acts as a flood plain to take flood water away from the new housing estate to the south and that the current access arrangements are unsuitable to serve new development.

Home Builders Federation (HBF) agree that the GNSP should designate safeguarded land within the Green Belt.

Keyworth Conservation Area Advisory Group suggest that situations post Covid will determine where there is a need for building and decisions for suitable land should take account of when the full effect of the potential new normal is clearer.

Nottingham Credit Union's comment on this question reads 'everywhere'.

Nottingham Green Party notes that the concept of Safeguarded Land seems to be, in the context that it is presented, land that will be developed, eventually and so takes land out of the Green Belt by stealth. This is unacceptable.

Notts Wildlife Trust suggested that safeguarded land acts as a 'reserve' site. Whether the site will come forward or not is however unpredictable, so it is in effect allocated. For clarity, the plan should either allocate sites or not so do not think safeguard land should be designated.

Nottinghamshire Campaign to Protect Rural England disagree with the designation of safeguarded land. Safeguarding land creates uncertainty and provides opportunities for speculative planning applications. Should additional or different development sites be needed in the future, these can either be found on a case by case basis or allocated for development as part of the next review of the Local Plan.

Pedals (Nottingham Cycling Campaign)'s comment on this question repeats the question.

RBC Leake Ward Members agree with the designation of safeguarded land and propose that any of the sites they suggest for release which are not released should be safeguarded, including R07.2 and R07.3; R15.2, R15.1;

land around Ratcliffe-on-Trent, Keyworth and Cotgrave; land around Tollerton, Cropwell Bishop, East Bridgford, Bradmore, Bunny, Cropwell Butler, Newton, Plumtree, Shelford, Upper Saxondale; and possibly land around Ruddington and Gotham also (but there are concerns about coalescence here).

Rushcliffe Green Party comment that 'safeguarded land' is a phrase designed to confuse and mislead the public as any reasonable person would interpret this as intending to safeguard land from being developed, whereas the intent in this document is the opposite.

Summarised comments from local residents

The majority of local residents who commented, disagreed with the designation of safeguarded land. There was strong support for the preservation and protection of the Green Belt. Boundary changes should only be considered in exceptional circumstances and then only when sufficient and credible evidence can be presented to demonstrate minimal impact on the environment and wildlife.

Concern was expressed that the quality of life in existing settlements should be prioritised over uncontrolled urban sprawl, although it was unclear whether the designation of safeguarded land would assist or hinder this.

Several local residents suggested that brownfield land should be considered before the designation of safeguarded land. Several commented that research should be undertaken to identify brownfield land within the Nottingham conurbation before land is released from the Green Belt. One suggested that the Green Belt should only be built on once all brownfield sites have been used and sites with planning permission have been completed. By focussing on brownfield first and combined with conversion of employment sites to residential, some were of the view that all needs could be met without further release of land. In terms of the Ratcliffe on Soar power station, concern was expressed that this was being considered as a site for a sustainable settlement whilst plans were underway to replace the power station with an incinerator.

Some residents expressed concern regarding the principle of safeguarded land, commenting that it renders Green Belt policy meaningless, that the land will be built on eventually anyway, and that it is not appropriate to anticipate any housing requirements which might impact on the Green Belt in future plans. Others were concerned that defining Safeguarded Land will allow proposed developments to avoid consideration of the usual issues around development of green belt. Some felt that the phrase is misleading as it implies that land is protected from development whereas it appears the opposite is true. One resident felt it was unwise to designate safeguarded land to projects which may have only a marginal chance of coming to fruition in any foreseeable timescale. One resident was concerned that by identifying safeguarded land it would put pressure on immediate development of these sites.

Two residents felt as though they had insufficient knowledge to comment on this question, although one of these commented that it sounded like a good idea.

One resident felt that the designation of safeguarded land had some possible merit, but only in regards to neighbourhood plans created with local knowledge, and was impossible for a strategic document. Another commented that areas not in the Green Belt but in open countryside should be allowed a modest amount of dispersed development particularly suitable for self-builders. One resident agreed with the designation of safeguarded land, commenting that such land could provide improved certainty and clarity to decision making and enhance the delivery of new development.

A significant number of local residents had misunderstood the concept of safeguarded land and commented that they supported the principle of safeguarding land from development. Other reasons that safeguarded land was supported was where it provides a measure of flood attenuation, to protect fields and hedgerows and to protect land with amenity or leisure value. Safeguarded land was also supported as a planning tool to protect the Green Belt, to safeguard land between settlements from development and to prevent urban sprawl.

Chapter Three: Green and Blue Infrastructure and the Natural Environment

1. Question GBI 1: Strategic Green and Blue Infrastructure

Are there other areas, corridors, or individual open spaces that should be identified as Strategic Green and Blue Infrastructure?

Summarised comments from statutory organisations

Amber Valley Borough Council state that development within areas adjacent to Amber Valley (identified as Strategic GBI) could potentially contribute to the protection and enhancement of green and blue infrastructure through tree and woodland planting, where it would be appropriate or practical taking into account landscape, flood risk and ecological considerations.

Burton Joyce Parish Council states that strategic land G10 provides a vital link line to Gedling Country Park and the surrounding countryside and to the River Trent and valley, essential for sensitive wildlife. Both banks of the Trent, from Colwick downstream to the borders of this Area, are clearly important to the local environment and the wider area. It also highlights the potential threats to the River Trent GBI corridor of gravel extraction at Shelford

Calverton Parish Council has identified a significant recreational area of Open Access Land to the south of Calverton (between Georges Lane and Spindle Lane) as an important area of GBI. Calverton PC also identify no wildlife corridors from the south to the north of Calverton. There are important wildlife networks however between the wooded areas on the ridgeline to the south and southwest of Calverton and the area of the former Calverton Colliery, along with the extensive forests to the north and northwest. There are a number of Local Wildlife Sites within these areas – and also the prospective ‘Sherwood Forest Special Protection Area’ to the north. It would be useful if the plan could recognise and make provision for protecting and consolidating the established environmental networks that exist across this significant area of countryside.

Chetwynd: The Toton and Chilwell Neighbourhood Forum identify the following GBI assets: Toton Fields LNR, Toton Washlands, and Hobgoblin Wood & Chetwynd Playing Fields (both within the Chetwynd barracks site). Also, the ‘horseshoe’ in the barracks linking from Hobgoblin Wood through to the extended Toton Fields LNR.

Gotham, Barton in Fabis, Kingston on Soar, Ratcliffe on Soar and Thrumpton Parish Councils/Meetings state that the Biodiversity Opportunity Maps should inform the identification of GBI corridors and that the Trent Valley is a strategic GBI corridor. Barton in Fabis and Ratcliffe on Soar specifically identify land between Wilford and Thrumpton as being of

particular concern, given development pressures, and that it should be identified as strategic GBI.

Granby cum Sutton Parish Council would like all named water courses identified as GBI assets.

Historic England has not identified any assets or corridors, but does highlight the potential for Paleolithic remains within the Trent Valley and the need to synergies between the historic environment and GBI.

Linby Parish Council identify Local Green Space Designations in neighbourhood plans as GBI assets that should be identified. Nottinghamshire Wildlife Trust may also have more up to date ecological and habitat mapping.

Natural England state that Nottinghamshire Biodiversity Opportunities Map should be the basis of identifying areas that should be identified as Green and Blue Infrastructure, together with discussion with key environmental stakeholder groups.

Papplewick Parish Council have highlighted the importance of GBI for health and well-being and support the recognition given to GBI. It specifically identifies the importance of the Environment Agency's Trent Gateway Project.

Radcliffe on Trent Parish Council identify land either side of the A52 as a GBI corridor.

Saxondale Parish Meeting identified that A52 and elevated land above Shelford as GBI corridors.

Seven Trent is supportive of the principles behind GBI and the need to make space for water / treat water as a resource and highlights the need to ensure that surface water is discharged to the most appropriate outfall as identified by the Drainage Hierarchy.

Summarised comments from developers

Davidsons Development Ltd agree with the positive impacts of associating growth within the strategic river and canal corridors of the Trent, Erewash and Leen. Also within the Greenwood Community Forest and urban fringe locations.

Hallam Land identifies the development of the A453 Corridor strategic site (specifically R15.2 and R15.3) as providing an opportunity link the River Trent and Fairham Brook corridors through new GBI. New GBI could also connect to the West Leake Hills and Gotham Hill.

Hammond Farm states that GBI can provide a positive framework for new development and at present large areas of GBI network are not accessible to the public.

Hollins Strategic Land believes that land north of Old Grantham Road offers an opportunity to deliver green and blue infrastructure alongside new residential development.

Parker Strategic Land Ltd consider the categories define strategic GBI.

Taylor Wimpey supports the identification of Grantham Canal and Fairham Brook as a GBI corridors, where infrastructure should be delivered as part of Strategic Urban Extensions.

Summarised comments from other organisations

The Canal and River Trust and the Grantham Canal Society identify the River Trent and canal corridors as specific blue infrastructure assets which should be designated as strategic GBI corridors.

A Rushcliffe Borough Councillor for East Leake states that GBI is too focused on urban or urban fringe areas and that open countryside should be recognised as GBI. They specifically identify Kingston Brook and Heritage Railway as a GBI corridor.

A Rushcliffe Borough Councillor for Ruddington supports the development of the Garden Village in the Vale of Belvoir and at Langar Airfield, and enhanced GBI along the Grantham Canal, A52 and A46 corridors.

A Rushcliffe Councillor identified land further east within the Trent Valley could be developed as a recreational zone.

Friends of Sharphill identify Sharphill Wood and its setting as being an important GBI asset which requires protection.

The Nottingham Local Access forum, Pedals and Nottinghamshire Ramblers have identified the linked green spaces and corridors created in the City by the 1845 Enclosure Act should be included. Green spaces linked by the River Leen and Daybrook are important as well as the Nottingham and Beeston Canal, Erewash Canal, Grantham Canal, Tinkers Leen, Fairham Brook and Most of the River Trent. Pedals specifically identify the delivery of the Environment Agency's Trent Gateway Project as important. The Ramblers have also identified the Country Parks as important recreational and wildlife assets which should be integrated into the GBI network.

Nottinghamshire Wildlife Trust support references to the Biodiversity Opportunity Maps. These should be taken forward and given weight when planning GBI at a strategic level. The full hierarchy of nature conservation sites should form the 'backbone' of strategic GBI. Other sites, such as Local Nature Reserves, country parks, mapped city open spaces, plus all wildlife sites and formal/ informal reserves can all be valuable components of strategic GBI.

Rushcliffe Green Party have identified the following as GBI corridors: Great Central railway corridor; Bingham to Melton railway corridor; Nottingham to Melton railway line corridor; River Trent; Grantham Canal corridor; Fairham Brook corridor; and River Smite corridor.

University of the Third Age recommend that advice from experts should inform the indication of GBI corridors or assets.

The Woodland Trust request that ancient woodland, ancient trees and ancient wood pasture should be identified as Key GB assets, particularly within Sherwood Forest.

Summarised comments from local residents

A number of comments highlighted Green and Blue infrastructure assets within the Vale of Belvoir, including the River Smite valley, Grantham Canal, and network of rights of way. The Vale should be protected as a strategic corridor.

The River Trent Valley was similarly identified as a strategic corridor by residents, specifically opportunities along the Victorian Embankment, the Attenborough Nature Reserve, where the River Erewash merges, and east of Lady Bay (which received a number of comments that highlighted the area's contributions to flood water storage, biodiversity, sports, and recreation).

Land south of Calverton, located between Georges Lane and Spindle Lane is identified as a new recreational area (and open access land). This should form part of a GBI corridor that runs from south to north around the west of Calverton which also comprises a number of wooded areas, former colliery and golf course. Another resident identified a well-established circular walk around Calverton which included five areas of woodland. This should be protected and the environment enhanced.

Woodlands, particularly those on ridgelines, Rushcliffe Country Park, Fairham Brook, and Kingston Brook were identified as important corridors by a number of residents. Others identified the countryside beyond the Green Belt as having value and needing protection.

A number of comments emphasized the need to create GBI (as part of new developments) as well as protect existing GBI, including improvements to the cycle network (separating bikes, pedestrians and traffic from each other) and protection of rights of way over open countryside.

Individual comments identified the following GBI corridors: Beeston Rylands and Boots/Seven Trent; River Soar; the A52 (between Radcliffe, Shelford and Newton); land north of Loughborough; and Edwalton Golf Course. Their width should be maintained to ensure they prevent urban areas merging and function as wildlife corridors.

Individual comments suggested the following assets should be protected: The Old Railway Bingham; National Watersport Centre; Sharphill Wood; Edwalton Golf Course as well as land around Cropwell Bishop, Eastwood, Ravenshead and land south of Keyworth to Bunny. Another resident highlighted the need to preserve a route for the restoration of the Grantham Canal linkage with the River Trent. Comments on Sharphill Wood identify the existing developments at Edwalton as already adversely affecting the wood.

Urban Fringe Enhancement Zone should extend around Key Settlements, not just the main urban area. It should also extend beyond the Fairham Pastures development.

The scale and labelling of map was criticized as this did not enable the identification of anything which is missing.

2. **Question GBI2: Strategic Allocations Policies**

How can proposed development enhance and protect Green and Blue Infrastructure, nature conservation assets and the wider ecological network?

Summarised comments from statutory organisations

Amber Valley Borough Council states that the provision of new housing and economic development within the Erewash Valley could potentially contribute to the protection and enhancement of green and blue infrastructure through the provision of or financial contributions towards multi-functional GBI.

Barton in Fabis, Gotham, Kingston on Soar and Ratcliffe Parish Councils encourage the concentration of development on brownfield land, as green field development sites are harder to achieve net-gains in biodiversity and undermines regeneration of urban areas.

Burton Joyce Parish Council positively encourage increased use of public transport and plant small-scale woodland (this could utilise some of the remaining farmland between the A612, the Severn Trent Water Treatment and Bio Plant, and the River Trent).

Chetwynd: Toton and Chilwell Neighbourhood Forum highlight the importance of minimising and mitigating impacts, linking active travel with BGI corridors, and de-culverting streams. Requirement to deliver biodiversity net-gain will assist the establishment of ecological networks and improved BGI.

Derbyshire County Council has emphasised the delivery of GBI on-site alongside developer contributions towards off site cycle routes to and from developments where these offer real and viable alternatives to routes using the local highway network, or where contributions can be made to enable direct access to existing networks.

The **Environment Agency** suggest that a blanket policy prevents adverse impacts on Blue and Green Infrastructure (including wildlife site) through the creation of buffer zones.

Granby cum Sutton Parish Council state that wildlife corridors that link land and water should be retained and floodplains protected.

Linby Parish Council state that avoiding areas of high sensitivity, focusing development on existing centres, protecting landscape features, robust design policies, and ensuring that landscape and public realm are an integral part of the design of strategic sites will assist enhancement and protection of BGI. Applying Linby Neighbourhood Plan policies will also assist.

Natural England highlight that biodiversity and environmental net gain can encourage investment in new and existing BGI assets and therefore needs to be considered in parallel. Natural England also state that sufficient evidence on how best to protect and invest in the green infrastructure network is essential in order to develop an understanding of the whole network within the Plan area which would help to direct development to the right locations to protect and enhance BGI, and to also guide offsite net gain to the right areas to make the biggest impact. Development Briefs/Concept statements can distil the high level green infrastructure principles in a Green Infrastructure Strategy, to influence site planning and design. How to achieve net gains would fit in well with a BGI concept statement.

Nottinghamshire County Council has highlighted 'healthy landscapes' and how they are used as an approach to the delivery of BGI.

Radcliffe on Trent Parish Council prefer the development of smaller sites that do not result in ribbon development and include green corridors. Flood plains should be maintained.

Ruddington Parish Council do not believe that development can enhance BGI.

Saxondale Parish Meeting suggest that the strategic development should avoid over developing large sites and instead focus on smaller developments that include green space breaks. Avoid ribbon development, protect the flood plain and support wildlife infrastructure.

Severn Trent state that development will need to be designed around the existing BGI assets and landscape features making the most of the landscape to ensure that multi-functional space and benefits are achieved and result in a positive impact on the development. This will need to be a key element of developing site Masterplans for the strategic sites, incorporating site wide infrastructure including drainage and SuDS.

Summarised comments from developers

Barwood Homes have highlighted the GBI assets adjacent to their land off Hollygate Lane (north of the canal) and Middlebeck Farm (at Mapperley) and the improvements the development of this land would have on them, including biodiversity net-gains.

Barwood Homes have also identified existing and possible GBI assets within and on the edge of their land at Bassingfield that would preserve and enhance the natural environment. This includes a green buffer around Bassingfield village.

The Crown Estate highlights the implications of reducing losses in biodiversity and reductions in the developable area. It highlights the opportunities to provide new BGI within their land at Bingham and the areas low sensitivity.

Fisher German (representing Malcolm Hodgkinson and Joanna Sztejer) and **The Trustees of the Locko 1991 Settlement** state that development adjacent to or that contains designated Blue or Green Infrastructure, should enhance and protect the assets (using buffers or enhancements). There is also the opportunity to increase new BGI as an integral part of new strategic development. This could be linked to requirements to deliver environmental net gain.

Hallam Land Management specifically identified the BGI benefits that the development of A453 corridor would bring, including links between the River Trent, Fairham Brook, Gotham Hill and West Leake Hills.

Hammond Farm, Longridge Homes Ltd, Persimmon Homes, Stubbs and Whittington highlight the benefits new development can provide by; formalising and safeguarding assets (by buffering and creating transitions); and delivering footpaths, planting woodland and hedgerows and other biodiversity measures as well as parking. BGI should be seen as complimentary land uses. Stubbs and Whittington also highlight the potential for BGI improvements on their site at Forest Farm, Papplewick.

Harworth Group have identified the BGI opportunities within their proposal for the Melton Road site at Tollerton.

Hollins Strategic Land have identified BGI opportunities within their proposal for Aslockton, off Old Grantham Road.

Jelson Homes and the Wheatcroft Family have identified BGI opportunities at Hall Farm, Radcliffe on Trent.

Mather Jamie, Parker Strategic Land Ltd, Samworths Farm and Taylor Wimpey state that strategic growth should have master plans that identify how BGI objectives are to be met, and propose specific proposals, including off-site and delivery of environmental net gain. BGI must be an integral part of new development, these could include buffers and centre points within the site.

Mather Jamie specifically highlight that at Catstone Green, ownership extends beyond the proposed development area and proposals can enhance the setting of the development and also provide a new parkland edge to the city. A BGI Strategy has been provided for this site. **Parker Strategic Land Ltd** also highlight the opportunities to provide new BGI on their site at Colston Gate, Cotgrave.

Richborough Estates highlights that allocations should avoid the development of areas of greatest BGI value. However, where areas of BGI exist within a wider site, they should be retained and enhanced within non-developable areas.

Strawsons Group support the objectives and have highlighted how their proposal at Cossall Road, Trowell can enhance and protect BGI.

Taylor Wimpey state that appropriately planned new development can identify green and blue infrastructure assets and protect and enhance these through engagement and careful master planning.

William Davis accepts that BGI can increase the value of development. However, it often requires upfront planting and preparation and this impacts on cash flow and the viability of the development. This will need to be fully considered through the viability assessment. A minimum percentage of BGI could be included in a policy.

Summarised comments from other organisations

Burton Joyce Climate Action Group believe that wildlife corridors (hedgerows, trees, grassland, drainage ditches and scrub) must be maintained and enhanced.

Campaign to Protect Rural England state that respecting and protecting landscape value and maximising the biodiversity potential of the Green Belt will enhance and protect Green and Blue Infrastructure, nature conservation assets and the wider ecological network.

The Diocese of Southwell and Nottingham identify Green and Blue Infrastructure as important to health and wellbeing and the plan should determine minimum amounts of green space a person requires that is accessible within a 5-minute walk.

The Ramblers Association highlight Derbyshire County Council's 'Greenways' initiative as an example of creating GBI (active travel and wildlife corridors).

The Rushcliffe Borough Councillor for East Leake stated that traditional parallel streets provide garden corridors and these should be protected from garden grabbing or tandem developments.

The Rushcliffe Borough Councillor for Gotham stated that the plan should prioritise the development of brownfield land.

The Nottingham Green Party are concerned that demonstrating gains will become a 'game' and that not for profit organisations should be utilised to verify environmental enhancement. **The Rushcliffe Green Party** highlighted the benefits for providing bigger, better and more connected BGI/habitats rather than small isolated sites. It notes the benefits SUDs provides for creating habitats, and that brownfield sites can contain valuable habitats (more valuable than some agricultural uses).

Nottingham Open Space Forum considers the avoidance, or at the very least, reduction in losses in biodiversity is not strong enough. Net-gain is required.

Nottinghamshire Wildlife Trust state that the plan must comply with the mitigation hierarchy (avoid, mitigate, compensate) and that nature recovery networks with excellent habitat connectivity form bigger, better and more joined up sites, using strategic development policies where appropriate. Avoid creation of small, isolated BGI that are neat and tidy and provide only marginal wildlife benefit. The plan should recognise road verges and brownfield sites as valuable wildlife resources. Proposals must provide sufficient long-term funding for management, including SUDS and other Natural Flood Management strategies which can be used to create wetland habitat.

The Woodland Trust would like to see trees and woods protected as BGI assets and targets for the expansion of tree canopy cover.

Summarised comments from local residents

A number of residents objected to development within the Green Belt and the environmental impacts and flood risks this would have. They favoured development of brownfield land (which is more sustainably located) or sites already allocated for development in Local Plans, and did not believe that development could enhance and protect BGI or the natural environment as they are mutually exclusive.

Many residents highlighted that avoiding BGI assets and areas of biodiversity value is critical. Some identified these areas within potential strategic sites.

Reducing the density of development within allocations, placing BGI at the centre of development planning, increasing public and private areas of greenspaces (including gardens, play space, allotments, and wider tree lined streets) and retaining hedgerows, trees and woodland was highlighted by some residents. Quaker Towns were provided as an example. Priority habitats (including hedgerows) on sites must be protected and not isolated within strategic developments to ensure wildlife corridors are provided at a local scale. Flood plains should be protected and all developments should achieve net-gain.

Increasing connectivity across the River Trent between West Bridgford, Beeston and the City was supported, as was improving cycle connectivity between East Leake and Nottingham/Clifton Park and Ride or Loughborough. These cycle ways should not be constrained to areas of existing or proposed greenspace and must be retrofitted into urban areas.

A number of residents opposed the potential loss of recreational, flood storage, sports and biodiversity BGI if the strategic site east of Lady Bay were allocated. This area is an important green corridor linking BGI assets with urban areas.

Decisions should be made by Councillors and residents, and monitoring of delivery and enforcement was emphasised by residents.

Blue infrastructure lacks facilities.

Residents specifically highlighted flooding as issues for R12.1 & R12.2.

3. **Question GBI3: Biodiversity Net Gains**

How should we ensure new developments achieve net gains in biodiversity?

Summarised comments from statutory organisations

Amber Valley Borough Council state that subject to the Environment Bill policies could be introduced which require either the provision of suitable measures to enhance biodiversity within or adjacent to new development sites and/or financial contributions towards the provision of such measures in other suitable locations.

Barton in Fabis, Gotham, Kingston on Soar, and Ratcliffe on Soar Parish Councils suggest that the careful consideration of existing biodiversity must form a key part of the site selection process. The more sensitive the sites the more challenging and expensive it will be to achieve net gains and the greater the need to avoid, mitigate or compensate adverse effects. They state that a fair site evaluation methodology is required to ensure potential sites truly contribute to carbon neutrality and deliver net gain.

Chetwynd: The Toton and Chilwell Neighbourhood Forum highlighted the importance of providing natural greenspaces close to residents, particularly those in deprived communities. Compensation elsewhere should be the last resort.

Derbyshire County Council state that existing planning processes and tools, including Developer contributions, and / or conditions, and / or specific design elements of a given development should be utilised to deliver net gains.

The Environment Agency state that Natural England's Biodiversity Metric Tool can be used by developers and LPA's to calculate biodiversity net gain.

The EA will co-operate to produce robust policy wording which clearly sets out what, and how much, is expected from new developments.

Granby cum Sutton Parish Council believe that scientific advice must determine net gains.

Linby Parish Council believe that development should be directed to existing centres to minimise impacts. Policies on protection of landscape features, robust design policies and ensuring that landscape and public realm are an integral part of the design of strategic sites should also assist the delivery of net-gains. Also Linby Neighbourhood Plan policies NE1 Habitats, Trees and Hedgerows and NE2 Landscape and Rural Character in the Linby Neighbourhood Plan may assist.

Natural England identify the Biodiversity Metric 2.0 as a tool that can be used to measure gains. NE advise that this metric is used to implement development plan policies on biodiversity net gain. CIEEM has also developed 'good practice principles' for biodiversity net gain, which can assist plan making authorities in gathering evidence and developing policy.

Policies should set out the approach to onsite and offsite delivery. NE advise that on-site provision should be preferred. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan.

Papplewick Parish Council supports the principle of seeking biodiversity net gains and this should be planned from the outset.

Radcliffe Parish Council state that developments must have less hardstanding, larger developments must deliver on site, smaller sites however should contribute to off-site improvements in accordance with the 10% requirement as set out in the Environment Bill.

Ruddington Parish Council highlight that developments should be planned around existing natural assets and include a maximum density figure to ensure land is left as open space. Habitats should maximise net-gain.

Saxondale Parish Council and Radcliffe Parish Council consider that benefits of net gain will be undone if congestion continues to increase, this needs cleaner, greener transportation policy.

Severn Trent state that within strategic sites biodiversity net gains should be incorporated in master plans. Land may be required for GBI at the outset and contribution made to ensure that the spaces are delivered in coordination with the development process. Where these corridors include SuDS, the required attenuation infrastructure and flow controls will need to be constructed prior to development of the site to prevent an increase in flood risk.

Summarised comments from developers

Gaintame Ltd, Persimmon Homes and Wilson Bowden Developments believe that the ability for each site identified for strategic growth to achieve net gains will vary according to the biodiversity value found on each site prior to development. Onsite mitigation will significantly reduce the number of new homes a site can deliver and on sites with high biodiversity value they will be unviable. To avoid sites being rendered undevelopable a strategy for delivering off-site biodiversity enhancements should be developed. It will be difficult to secure Section 106 contributions for off-site habitat if new locations have not been identified. Similarly, the Crown Estate highlight the importance of locating development away from sensitive locations and the implications on achieving net-gain if not doing so. They highlight the opportunities on land north of Bingham.

Hallam Land Management support the use of Natural England's biodiversity metric to determine net gain.

Hammond Farm and Langridge Homes both believe that developers and landowners are keen to promote biodiversity, as it makes their developments more attractive and enhances value. Measures to improve biodiversity can easily be built into new developments.

Home Builders Federation, Gladman, Richborough Estates, Persimmon Homes and Taylor Wimpey state that policies on net gain should not deviate from Government targets (10%) as this provides a level playing field and avoid confusion.

Home Builders Federation also believes that Nature Recovery Strategies will help locate development sites by avoiding sites with biodiversity value that would be harder to achieve net gain on. The costs of achieving net gain should be costed within viability assessments. Furthermore, statutory biodiversity units should be used where local habitat compensation schemes are not available.

Mather Jamie believe that master plans for strategic developments should identify how net gain would be achieved and that it can be delivered (in accordance with the Environment Bill requirements). Ownership of alternative off-site compensation should be sought. **Parker Strategic Land Ltd** also believe masterplans for strategic locations should deliver net-gains and that the requirements should be set out within conditions or legal agreements.

William Davis believe that within strategic sites, the delivery of biodiversity net-gains should be on site through multifunctional BGI spaces. For smaller sites financial contributions could be made in order to achieve the required net gain where there is little or no space for biodiversity. Establishing a threshold above which on-site contributions would generally be sought (subject to exceptional circumstances) would provide upfront certainty as to the need to plan for net gain.

Summarised comments from other organisations

Burton Joyce Climate Action Group encourage the use of biodiversity assessments and the setting of a 10% target for biodiversity net gain.

The Carlton and Gedling U3A state that advice from stakeholders should inform policies that deliver net-gain.

The Ramblers Association states that the plan should identify and enhance a network of green ways for wildlife corridors, which includes gardens, across the conurbation.

The Rushcliffe Borough Council member for Gotham encourages the careful selection of sites in order to determine whether net-gain can be achieved. Avoid, mitigate or as a last compensate.

The Rushcliffe Borough Council member for East Leake identified SuDS as having potential to achieve net gains, but a policy is required to ensure they are high quality. Also planting schemes should utilise native species of plants, and the delivery and maintenance must be monitored.

The Rushcliffe Borough Councillor for Ruddington states that developments should be planned around existing and the creation of new habitats. In addition, a maximum density figure to create more green and open spaces on the land should be established.

The Rushcliffe Borough Councillor for the Abbey ward (West Bridgford) considers the prevention of urban sprawl as a method of delivering net-gains (i.e. avoidance of harm).

The Friends of Sharphill Wood highlight the importance of the wood as Local Green Space and the need to protect it.

The Woodland Trust state that all irreplaceable habitats (e.g. ancient woodland and ancient trees) must not be lost to development and that these habitats should be excluded from net gain calculations. Tree planting and woodland creation should be promoted and a target set for achieving 30% tree canopy cover in new developments.

The Nottingham Green Party, Rushcliffe Green Party and Nottinghamshire Wildlife Trust highlight the need to use measurable criteria/targets to establish net gains, and publicly publish the assessments, so that members of the public and organisations can check and challenge how the conclusions have been reached. This will assist enforcement.

The Nottinghamshire Wildlife Trust and Rushcliffe Green Party emphasise the need to avoid the isolation, damage or destroy valuable existing wildlife habitats or sites. Net gains could be made through larger gardens, more substantial open spaces that are managed appropriately for wildlife and linked to GBI and countryside.

Apply Lawton Principles (making areas better, bigger and more connected). Policies should concentrate funding in significant habitat developments rather than dissipating it.

Biodiversity Opportunity Maps should inform opportunities for net-gain. It is however possible to take this a stage further and assess at allocations stage the biodiversity value of each site, as has been done in West Berkshire.

Summarised comments from local residents

Residents suggested that specific policy requirements should retain, enhance and/or create areas/corridors of natural green space (hedgerows, grassland, trees and ponds) alongside informal/formal recreational spaces that allow the migration of species within and adjacent to sites. Allowing the migration of species between gardens (notably hedgehogs) was suggested by many residents. Developers should also make contributions to the enhancement of biodiversity off-site.

Setting a maximum density that ensures land is left for nature was supported by a number of residents.

Many residents did not believe that development could achieve net-gains in biodiversity. They believe that development that adversely affects habitats should be prevented (i.e. avoided) and that development should be directed to brownfield sites.

The need to carefully select sites was suggested by residents in order to avoid those with greater biodiversity value and which will therefore require greater biodiversity value to achieve a net-gain. The methodology for site selection must be robust and fair and should avoid, rather than mitigate or compensate losses in biodiversity. Focusing on brownfield land would achieve this.

A number of residents stated that developers should provide detailed net gain calculations based upon Defra guidance and should not be approved unless the gain is significant.

The need to monitor delivery of net gain was highlighted by a number of residents, who had concerns that agreed plans were not being complied with and/or that agreed longer term maintenance was not being undertaken. It was also highlighted that the 'operational/occupational' effects of development upon biodiversity such as recreational disturbance or pollution are considered. They also highlighted that decisions should be made at a local level by residents and Councillors.

Similar responses to question GBI2 highlighted the need to recognise the importance of local habitats which combined have low-level BGI value (compared to strategic GBI).

A number of residents highlighted potential strategic development sites that have biodiversity value, notably R05 (South of Orston).

Chapter Four: Green Belt

1. Question GB1: Principle of the Nottingham-Derby Green Belt

Should the principle of the Nottingham-Derby Green Belt be maintained?

Summarised comments from statutory organisations

Amber Valley Borough Council considers that changes should only be made where there are 'exceptional circumstances'.

Burton Joyce Parish Council agree that the purposes set out in NPPF para 134 remain valid, and the prevention of the merging of towns and villages into each other should be a positive aim of planning strategy. This applies very obviously to the area West of Nottingham, but the inevitable reduction of Green belt in that part of the Plan area only gives greater importance to the Green Belt East of the City.

Chetwynd: The Toton and Chilwell Neighbourhood Forum agree that the principle of the Nottingham Derby Green Belt should be maintained.

Derbyshire County Council supports the findings of the last Green Belt review, with regard to the most important areas being between Nottingham and Derby, and immediately north of this. It emphasises the importance of joint working, which should include Erewash BC and Derbyshire CC. A strategic review should precede any release.

Historic England considers that, if land is to be released, the Plan should ensure that the historic environment has been fully considered.

Kingston on Soar Parish Council agree that Green Belt principles should be maintained. Whilst their main purpose is one of environmental protection, the Green Belt facilitates social and economic benefits, which cannot be understated. The Green Belt helps contribute towards urban regeneration within city centres and encourages development on brownfield sites. Brownfield sites should be prioritised for development ahead of greenfield land and development of new housing should meet the needs of vulnerable communities as well as wider housing requirements.

Rempstone Parish Council does not support maintaining the Nottingham-Derby Green Belt.

Urban Vision Enterprise on behalf of Linby Parish Council agree that the principle of the green belt should be maintained, although accepting there may be some adjustment based on evidence.

The following Parish Councils and Parish Meetings all consider that the principle of the Green Belt should be maintained and they emphasise the

importance of the Green Belt in their areas. Some consider that there should be no changes at all to Green Belt boundaries.

- **Barton in Fabis Parish Council**
- **Bradmore Parish Council**
- **Gotham Parish Council**
- **Granby cum Sutton Parish Council**
- **Papplewick Parish Council**
- **Ratcliffe on Soar Parish Meeting**
- **Ravenshead Parish Council**
- **Saxondale Parish Council**
- **Thrumpton Parish Meeting**
- **Tollerton Parish Council.**

Summarised comments from developers

As well as responding to the question, the majority of the following landowners and developers promote development at particular sites and these comments are summarised separately.

Avison Young on behalf of Jelson Homes and the Wheatcroft Family comments that the sustainability of Radcliffe on Trent is a key consideration. Also relevant is the higher potential for place-making / good design and affordability that can be generated from larger, physically unconstrained sites such as that at Hall Farm.

Avison Young on behalf of Jelson Homes and the Wheatcroft Family notes that the Green Belt principle is long established and ought to remain a feature of the overall planning system. However, it is important that Green Belt is not retained for the sake of it and that only that strictly necessary to protect the defined strategic purposes of Green Belt is retained. Retention of Green Belt must in all cases be weighed against the need to prioritise development in sustainable locations.

Bidwells on behalf of Trinity College supports the principle but wants a review to meet housing needs.

Boyer on behalf of Michael Machin, Gaintame Limited suggest that land south of Wheatcroft Island should be reassessed as part of a new Green Belt review. Since the 2013 assessment, the Sharp Hill development has extended the urban area to the A52 and several large commercial, office and retail units have been constructed on Landmere Lane. The Gamston East urban extension has resulted in the first large scale incursion into the Green Belt beyond the boundary of the A52. The urban area of Nottingham will need to expand across the A52 to meet future housing need in locations capable of large scale strategic growth. Separation from Tollerton, Ruddington and WB can still be maintained with this proposal.

Boyer on behalf of Harworth Group suggest that, on the basis that exceptional circumstances for Green Belt release can be demonstrated, the

other considerations that direct Green Belt release must be considered through an updated Green Belt assessment. A future Green Belt review must consider areas adjoining villages such as Tollerton. A review of locations slightly further from the Nottingham urban area, particularly on the outer flanks of satellite settlements, would show a medium or low contribution to Green Belt purposes.

Boyer on behalf of Mr Stubbs and Mr Whittington consider the principle of this Green Belt should be maintained and the majority of Green Belt land should retain this designation. There are exceptional circumstances that justify changes to Green Belt boundaries, as defined in para 4.14 of the GOC document. The 2015 Green Belt Review included a review of land at Papplewick. This notes that although land around Papplewick is functional in achieving the purposes of the Green Belt, broad areas to the east are of lower value as there is less risk of coalescence with other settlements. Forest Farm Papplewick would fall within this broad area. The GNSP will require a strategic Green Belt review and the Forest Farm Papplewick site should be allocated for development through this review process.

Carter Jonas on behalf of Burhill Group Limited consider that the principle of the Green Belt should be maintained but that boundaries will need to be altered in order to meet the development needs. Boundaries to the south and east of Nottingham (in Gedling) in particular should be reviewed since the Greater Nottingham Strategic Plan at paragraph 4.9 confirms that the Green Belt in this location “serves fewer of the purposes because, while supporting the containment of the urban area, it is not separating major areas of development”.

Define on behalf of Bloor Homes (BHL) considers that the role and extent of the Green Belt should be considered in the context of other strategic policies and needs. A fundamental review of the Green Belt (both around Nottingham and Derby) is essential. BHL would welcome the opportunity to discuss the growth strategy and the role that their land can play in addressing the identified housing needs in the area. BHL have significant land interests in the area.

Geoffrey Prince Associates Ltd on behalf of Hammond Farms considers that there is only a weak case for retaining the Green Belt other than to the west of Nottingham and recommends the use of policies such as Green Wedges instead.

Geoffrey Prince Associates Ltd on behalf of Langridge Homes Ltd considers that there is only a weak case for retaining the Green Belt other than to the west of Nottingham and recommends the use of policies such as Green Wedges instead.

Hollins Strategic Land support the principle of the green belt insofar as it prevents the urban areas from merging. However, there may be opportunities on the edges of the urban areas that make less contribution to green belt purposes. Any release of sites from green belt should not be in favour of sustainable non-green belt sites in other locations. A balancing

exercise is required between sustainable sites designated in green belt closer to Nottingham City and sustainable sites outside the green belt. Non green belt sites on the edge of settlements and close to transport hubs should be preferred above green belt sites.

JW Planning Ltd on behalf of Hall Construction Services wants the principle to be maintained but for there to be a review to meet housing needs, focusing on 'key settlements'.

Marrons Planning on behalf of

- **Mather Jamie Ltd, and**
- **Harris Land Management**
- **Whitefields Farm (Mr and Mrs Hammond)**

refer to the reference in the consultation document to the need for consideration as to whether releasing Green Belt land may produce a more sustainable outcome than channelling development towards areas outside the Green Belt and proposes a hybrid development strategy which enables a dispersed pattern of development coupled with sustainable urban extensions. Whilst the authorities would need to satisfy themselves that neighbouring authorities could not accommodate any of the development need a hybrid development strategy should be pursued which required the release of Green Belt for the purpose of pursuing sustainable development; regardless of whether the development needs of the area can theoretically be met without Green Belt release.

Nineteen47 on behalf of Richborough Estates considers that Green Belt should only be maintained where it meets the five NPPF purposes.

Oxalis Planning on behalf of: -

- **Bloor Homes (Midlands)**
- **Unnamed landowners and developers**
- **The South West Nottingham Consortium**
- **Richard Taylor**

considers the role and extent of the Green Belt should be considered in the context of other strategic policies and needs. A fundamental review of the Green Belt is essential to achieve the required sustainable growth of the Greater Nottingham Area. The ACS demonstrated that the careful application of the planning balance, alongside the need to meet housing requirements, provides the exceptional circumstances to remove land from the Green Belt and allocate it for development. The emerging Strategic Plan will need adopt the same approach to deliver sustainable growth.

Oxalis Planning on behalf of John A. Wells Ltd sets out the above comments and also suggests that land at Sharphill Wood, Langar Airfield and Clipston Woods should be developed.

Oxalis Planning on behalf of W. Westerman Ltd considers that there should be a review to meet housing needs and to take account of HS2.

Pegasus Group on behalf of Hallam Land Management wants the principle maintained and considers that the area to the west of Nottingham is still the most important, but considers that areas to the south and east are less important because they are not separating major areas of development.

Pegasus Group on behalf of Nottinghamshire County Council supports the view of the Report of Panel regarding the East Midlands Regional Plan, in that the Green Belt should separate Nottingham and Derby without surrounding Nottingham.

Persimmon Homes consider that where the greenbelt between Nottingham and Derby meets the five tests, specifically preventing coalescence of either City it should be retained. However, where the Greenbelt tightly bounds lesser outlier towns reasoned Greenbelt release may be deemed suitable.

Planning & Design Group (UK) Ltd on behalf of The University of Nottingham supports the principle but wants a review to the immediate west of Nottingham.

Ridge and Partners LLP on behalf of Barwood Land agree that the Green Belt must be maintained to prevent the coalescence of the two settlements. The focus for growth should be on less sensitive area to the east and to the south of Nottingham. There is therefore a need to review the Green Belt in this context to at least deliver the homes proposed by the Government. 'Planning for the Future' has an ambition of building 300,000 homes per year and Green Belt boundaries will need to be reviewed to meet this additional demand.

Savills on behalf of Gaintame Ltd considers that there should be a review taking account of HS2, with HS2 and the M1 forming the inner western boundary.

Savills on behalf of Wilson Bowden Developments comment that the 2006 Green Belt Review should be updated as it does not account for the proposed HS2 line. HS2 will now also serve to separate Nottingham and Nuthall and will provide a new defensible and permanent Green Belt boundary in accordance with paragraph 139 of the NPPF. Area 1 'Nottingham to Ilkeston and Long Eaton' which Site B08.5 is located within, should now be assessed differently and should be lower performing. Site B08.5 is well served by public transport and should therefore be considered for residential development as a priority.

Savills on behalf of Rushcliffe Borough Council support the general principle of the Green Belt and suggest that consideration should be given to non-Green Belt sites in sustainable location such as the safeguarded land at Edwalton Golf course.

Savills on behalf of Taylor Wimpey wants the principle to be maintained but wants a review to meet needs.

Savills on behalf of Wilson Bowden Developments considers that a new, independent, assessment is needed, which should take account of HS2, with HS2 and the M1 forming a new inner western boundary.

Stantec UK Ltd on behalf of both Barwood Homes and Barwood Land consider that land should be released from the Green Belt to meet housing need.

Uniper UK Ltd supports the principle but considers that a review is required in order to meet housing needs.

William Davis considers that the principle should be maintained, however releases should be considered in order to meet housing needs.

Summarised comments from other organisations

The following organisations all support the principle of maintaining the Nottingham-Derby Green Belt:

- **Burton Joyce Climate Action Group**
- **Carlton and Gedling U3A**
- **Keyworth Conservation Area Advisory Group**
- **Nottingham Credit Union**
- **Nottingham Green Party**
- **Nottingham Local Access Forum**
- **Nottinghamshire Campaign to Protect Rural England**
- **Nottinghamshire Wildlife Trust**
- **Pedals (Nottingham Cycling Campaign)**
- **Rushcliffe Green Party**
- **Sharphill Action Group**
- **Tollerton Against Backdoor Urbanisation**

The Home Builders Federation considers that the Green Belt should be maintained where the five NPPF purposes are served.

Nottinghamshire Ramblers agree that Green Belt area is important to city and other local residents and many parts can be accessed by on-road and off-road cycling and walking routes including the general rights of way network. All of these are vital to individuals' physical and mental health and need to be well-designed, well-promoted and well-maintained, to make the most of their potential benefits in all seasons, not just the drier and warmer months.

Positive Homes Ltd suggest that there is no obvious justification for a green belt around Nottingham. All it does is create bad choices for communities and individuals. In Rushcliffe, places like Bingham and East Leake have expanded rapidly - just outside the green belt - while villages like Keyworth, Ruddington etc. have seen no significant growth in a generation until recently and following a very lengthy process. All it means is people driving further to reach their jobs in the city, creating jams and pollution etc.

Summarised comments from local residents

A large number of representations were made by local residents. Many want no change to Green Belt boundaries, particularly in their areas. Some support limited release in appropriate locations.

The large majority of comments on this issue were from residents in Rushcliffe. There was emphasis on the value of the Green Belt locally and on its strategic value to the south and east of the City, with regard to settlements such as Radcliffe and Ruddington.

Some similar comments were made regarding the Green Belt in Gedling.

A few comments, in contrast, said that the southern and eastern parts of the Green Belt are less important in terms of coalescence and that there should be boundary reviews around towns, villages and 'brownfield' sites in Rushcliffe.

A limited number of comments were made regarding land to the west of the City. Some favoured release of land for development, including around HS2 and the M1; other respondents felt that Green Belt protection should take priority in the vicinity of HS2 and that settlements to the west should be protected from coalescence.

More generally, one resident feels that the Green Belt should not be maintained, because it stifles growth and regeneration, one considers that there should be a fundamental review, and several favour partial release to meet development needs.

Several merits of retaining the Green Belt were listed, including protecting community identity, preventing increased commuter traffic flows, preventing Nottingham and Derby merging into each other, retaining existing biodiversity and flooding benefits, retaining prime farmland.

2. **Question GB2: Approach to the Green Belt**

Are there any other considerations that should direct development towards Green Belt areas rather than non-Green Belt areas (including 'Safeguarded Land')?

Summarised comments from statutory organisations

Amber Valley Borough Council considers that there should only be development in Green Belt locations where there are 'exceptional circumstances'.

Barton in Fabis Parish Council considers that Green Belt releases should only be considered once all other viable options have been exhausted.

Bradmore Parish Council considers that Green Belt boundaries should only be altered in 'exceptional circumstances'.

Burton Joyce Parish Council consider that there are no other considerations that should direct development towards Green Belt areas rather than non-Green Belt areas.

Chetwynd: The Toton and Chilwell Neighbourhood Forum notes that the green belt must have, and continue to have, some intrinsic biodiversity value. Converting some of it to a park doesn't mean it retains the same biodiversity value. Since Broxtowe has actually converted more of its green belt to non-green belt land than other authorities (as a %), perhaps it should be less willing to convert more.

Derbyshire County Council feels that considerations should include the economic development and regeneration potential for Derbyshire. The Council also suggests that Green Belt constraints may justify a lower housing requirement.

Gotham Parish Council considers that Green Belt boundaries should only be altered in 'exceptional circumstances'.

Homes England comment that in relation to any proposed review of the Green Belt, targeted growth is supported to meet the Greater Nottinghamshire area's assessed housing need.

Kingston upon Soar Parish Council consider there are no other considerations that should direct development towards Green Belt areas rather than non-Green Belt areas and this should only be considered once all other viable options have been exhausted.

Papplewick Parish Council considers that priority should be given to developing brownfield land.

Ratcliffe on Soar Parish Meeting considers that Green Belt releases should only be considered once all other viable options have been exhausted.

Ravenshead Parish Council feels that Green Belt land should only be considered where it provides a sustainable alternative.

Saxondale Parish Meeting considers that the Green Belt area around Saxondale is already under direct threat and further development is not sustainable.

Severn Trent - Sewerage Management Planning comments that when removing land from the Green Belt considerations should include the local infrastructure, such as sewerage provision.

Thrumpton Parish Meeting considers that there are no other relevant considerations and that Green Belt releases should only be considered after all other viable options have been exhausted.

Urban Vision Enterprise on behalf of Linby Parish Council state that the approach to any amendment to the green belt should be clearly evidenced. 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.

Woodborough Parish Council considers that preference should be given to brownfield sites and smaller sites.

Summarised comments from developers

As well as responding to the question, several of the following landowners and developers promote development at particular sites and those comments are summarised separately.

Barton Willmore on behalf of JG Woodhouse & Sons refer to the GNSP document which notes that previous assessment work highlighted that the Green Belt to the south and east of Nottingham (in Gedling and Rushcliffe Boroughs) serves fewer of the Green Belt purposes. There is a need for RBC to revisit 2017 RBC GB study. Ruddington South East was assessed as making a medium-high contribution to the Green Belt (scoping 17 out of a possible 25). This assessment is flawed in that it assesses the preservation of the setting of all heritage assets, rather than just historic towns, which is not the purpose of the Green Belt, and, as such, incorrectly assigns Ruddington South East with a score of 5 out of 5 for the protection of the setting and special character of historic towns. The representation includes a revised Green Belt assessment for the area.

Carter Jonas on behalf of Burhill Group Limited state that directing development towards poorly performing areas of Green Belt to the south and east of Nottingham would reduce the over reliance on existing towns and villages having to deliver the levels of development required. Land should also be safeguarded to ensure the Plan accords with the requirements of the NPPF in meeting “longer-term development needs stretching well beyond the plan period” (paragraph 139).

Define on behalf of Bloor Homes (BHL) considers that the role and extent of the Green Belt should be considered in the context of other strategic policies and needs. A fundamental review of the Green Belt (both around Nottingham and Derby) is essential. BHL would welcome the opportunity to discuss the growth strategy and the role that their land can play in

addressing the identified housing needs in the area. BHL have significant land interests in the area.

Fisher German LLP on behalf of

- **Mr Malcolm Hodgkinson**
- **Samworth Farms Limited**
- **Joanna Sztejer**

note that Green Belt protection must be measured against long-term benefits of sustainable development. Not allowing development on Green Belt land would necessitate locating development some distance from the more sustainable settlements. Strategic plans can designate new areas of Green Belt to compensate for losses. Allocating insufficient land in the Green Belt will increase development pressures in non-Green Belt locations, often at a level not commensurate with the sustainability of the area, as already experienced in Rushcliffe Borough (East Leake). Not utilising Green Belt land is likely to lead to unsustainable transport patterns, increased congestion, and likely to not to take advantage of economic opportunities associated with existing and planned transport infrastructure.

Geoffrey Prince Associated Ltd on behalf of Hammond Farms says that considerations should include 'strategic growth corridors', public transport and proximity to settlements.

Geoff Prince Associated Ltd on behalf of Langridge Homes Ltd says that considerations should include 'strategic growth corridors', public transport and proximity to settlements.

JW Planning Ltd on behalf of Hall Construction Services Ltd considers that locations around 'key settlements' in close proximity to Nottingham are preferable to non-Green Belt locations.

Marrons Planning on behalf of

- **Mather Jamie Ltd**
- **Whitefields Farm (Mr and Mrs Hammond)**
- **Davidsons Developments Ltd (Gotham)**
- **Davidsons Developments Ltd (Aslockton)**
- **Davidsons Developments Ltd (Cropwell Bishop interest)**
- **Davidsons Development Ltd (Land South of Gamston)**

refer to the reference in the consultation document to the need for consideration as to whether releasing Green Belt land may produce a more sustainable outcome than channelling development towards areas outside the Green Belt and proposes a hybrid development strategy which enables a dispersed pattern of development coupled with sustainable urban extensions. Whilst the authorities would need to satisfy themselves that neighbouring authorities could not accommodate any of the development need a hybrid development strategy should be pursued which required the release of Green Belt for the purpose of pursuing sustainable development; regardless of whether the development needs of the area can theoretically be met without Green Belt release.

Nineteen47 on behalf of Richborough Estates says that priority should be given to development of safeguarded land, before further Green Belt releases; other considerations should be proximity to services and facilities and accessibility to the City.

Oxalis Planning on behalf of Bloor Homes Midlands considers the role and extent of the Green Belt should be considered in the context of other strategic policies and needs. A fundamental review of the Green Belt is essential to achieve the required sustainable growth of the Greater Nottingham Area. The ACS demonstrated that the careful application of the planning balance, alongside the need to meet housing requirements, provides the exceptional circumstances to remove land from the Green Belt and allocate it for development. The emerging Strategic Plan will need adopt the same approach to deliver sustainable growth.

Oxalis Planning on behalf of John A. Wells Ltd says that 'sustainable patterns of development' should be taken into account.

Oxalis Planning on behalf of Richard Taylor suggest considerations should include sustainable patterns of development such as public transport accessibility and economic potential linked to opportunities presented by HS2.

Oxalis Planning on behalf of South West Nottingham Consortium feels that considerations should include public transport accessibility and opportunities for job creation, linked to the emerging East Midlands Development Corporation.

Oxalis Planning on behalf of Unnamed landowners and developers refer to 'the balance of other strategic policies' and the need to promote 'sustainable patterns of development'.

Oxalis Planning on behalf of W Westerman Ltd refers to the importance of connectivity.

Pegasus Group on behalf of Hallam Land Management feels that the relative importance of different parts of the Green Belt should be assessed; in their opinion, Green Belt to the south of the conurbation in Rushcliffe is of less importance.

Persimmon Homes comment that not all Greenbelt may perform the functions intended by Greenbelt and such sites should be considered for release and where appropriate be made available for housing or other uses. Conversely non Greenbelt land may not necessarily be suitable for development and could be designated Greenbelt. Safeguarded sites are usually large urban extensions where a spatial boundary used to define the new Greenbelt edge exceeds the quantum of land deemed necessary for housing at a given point in time. Sites such as Calverton G06.1 abut housing allocations which have planning approvals. The release of safeguarded land should take priority over allocating new Greenbelt or Non-Greenbelt land as the principal of development has already been accepted.

Planning & Design Group (UK) Ltd on behalf of The University of Nottingham feels that considerations should include “the proportionality of development in villages beyond the Green Belt” and proximity to ‘key infrastructure routes’.

Q&A Planning Ltd on behalf of Newton Nottingham LLP consider land at the former RAF Newton to provide a strategic opportunity to accommodate development. Given its location on the edges of the Green Belt, the existing character of the landscape and that this area is set apart from other settlements, such development will have minimal impacts on the integrity of the Green Belt. Furthermore, development will serve to meet the housing and employment needs of Greater Nottingham whilst reducing the requirement to release Green Belt land that is of higher importance, particularly within the boroughs of Broxtowe and Erewash.

Ridge and Partners LLP on behalf of Barwood Land comment that although the Middlebeck Farm site is located within the Green Belt, the development of the site and its removal from the Green Belt would not have a significant detrimental impact on the overall purposes of the Green Belt. It would allow for a comprehensive development to come forward in a highly sustainable location. It is important to give full consideration to development within the Green Belt, particularly when it is close to existing settlements and represents a sustainable extension to the urban area as is the case for Middlebeck Farm.

Savills on behalf of Taylor Wimpey comments that considerations should include growth requirements and accessibility.

Savills on behalf of Gaintame Ltd feels that there should be consideration of the changed circumstances due to the HS2 proposals.

Savills on behalf of Wilson Bowden Developments state that Urban Capacity assessments should support any release of Green Belt sites for development. It is also important that the Strategic Plan sufficiently addresses the other requirements of NPPF paragraph 137 to increase densities on existing and proposed sites and produce a Statement of Common Ground with neighbouring authorities. Figure 4.1 of the Growth Options document states only 47ha of land has been released from the Green Belt within Nottingham City, lower than other authorities. As Nottingham City is at the top of the proposed ‘Hierarchy of Centres’, Green Belt adjacent to the Main Built Up Area should be released from the Green Belt as a priority. As one of the highest performing areas, sites within area B.08 should be prioritised above sites in other less sustainable search areas. Additionally, the proposed HS2 line that will cut through area B.08 will provide a new defensible Green Belt boundary.

Stantec UK Ltd on behalf of both Barwood Homes and Barwood Land consider that ‘sustainable’ sites which do not fully meet Green Belt purposes should be either released or safeguarded.

Uniper UK Limited indicates that considerations should include the potential for long-term economic growth, Development Corporation aspirations, previously-developed land, visual impact and public transport accessibility.

William Davis refers to public transport accessibility.

Summarised comments from other organisations

Carlton and Gedling U3A's view is that there are no other relevant considerations and that all Green Belt land should be protected.

The **Home Builders Federation** says that proximity to settlements should be a consideration. It also says that local housing need should be met in full, regardless of Green Belt constraints.

Nottingham Green Party comments on the value of the Green Belt and wants periodic review of it.

Nottinghamshire Campaign to Protect Rural England says that there are no other relevant considerations.

Nottingham Credit Union opposes development of the green belt land to the east of Lady Bay, both to the north and south of the A52, which would result in urban sprawl, impact on biodiversity and open space and increase flooding. Instead, we should wait to see where previously unexpected brown land becomes available within the existing urban area of greater Nottingham.

Nottinghamshire Wildlife Trust says that the effects on wildlife within and beyond the Green Belt should be considered; if 'disproportionate' development were proposed in Rushcliffe beyond the outer Green Belt boundary it would harm valuable wildlife sites and corridors.

Tollerton Against Backdoor Urbanisation considers that building on Green Belt areas should be avoided, however robust Green Belt boundaries should be ensured.

Summarised comments from local residents

Several responses to this question from local residents included comments on other Green Belt-related issues, which are summarised separately elsewhere.

Many people feel that there are no other relevant considerations and that there should be no development in Green Belt locations.

Many people also feel that any development in the Green Belt should be kept to a minimum and only used as a last resort once all other options have been exhausted.

Considerations which were proposed include:

- Proximity to employment and amenities, such as shops, schools and doctors, using public transport, cycling and walking
- Prioritising the use of previously-developed land
- Impact on climate change
- Economic potential, including opportunities presented by HS2
- Proximity to major transport hubs
- Whether land 'stockpiled' by developers outside the Green Belt has been used first
- Infrastructure and options for its enhancement.

Several people commented that there is no need for safeguarded land in Rushcliffe, and several of these also suggested that future need could instead be met by a 'garden village' or town near the M1/A453 junction.

Other comments that were made include:

- It is preferable that settlements in the Green Belt with good separation from others should have some Green Belt releases so as to reduce development pressures on settlements just outside the Green Belt
 - More development should be allowed in villages within the Green Belt, so as to support homeworking and reduce the need to travel
 - There should be more consistency in the release of Green Belt land across the area.
- General comments in relation to safeguarded land were: -
- It will be difficult to demonstrate exceptional circumstances to release any Green Belt land ahead of existing Safeguarded Land in equally sustainable locations.
 - There is no demonstrated need for any new Safeguarded land.

With specific reference to GBC, one resident suggested that a similar hierarchical approach to the ACS will be required in GBC to demonstrate exceptional circumstances for the release of the Green Belt. Safeguarded Land should be genuinely capable of accommodating development, demonstrated by detailed assessments. Landowners need certainty. The extent of any none developable safeguarded land should be explicitly identified and evidenced.

3. **Question GB3: Offsetting losses to the Green Belt**

What improvements to environmental quality and accessibility should we consider and how could these be achieved?

Summarised comments from statutory organisations

Amber Valley Borough Council suggests that improvements could include additional tree planting, where appropriate, and that such improvements could be achieved as part of the development or by financial contributions from developers.

Barton in Fabis Parish Council suggests new or enhanced Green Infrastructure, woodland or other appropriate planting, landscape and visual impact enhancements, biodiversity improvements and new walking or cycling routes.

Burton Joyce Parish Council suggest encouraging the use of public transport on new lines and using current infrastructure, by improving frequency of stops at rail stations and extending incentive fares to take cars off the roads. There could be greater integration of bus, rail and tram networks to facilitate greater use and efficiency. Encouraging cycling through improvements in a safer and more dedicated network of cycle routes is essential.

Chetwynd: The Toton and Chilwell Neighbourhood Forum note the competing pressures of recreation and biodiversity. Given that wildlife is already under pressure due to changes in the climate and therefore lacks the resilience to respond to changes in habitat, any development of Green Belt land needs to be extremely well planned. Since most Green Belt land is agricultural land, there may be opportunities to create viable Nature Recovery Networks, but new ways of managing urban green space need to be sought. Local Authorities should have a designated Biodiversity Officer to ensure the necessary level of Biodiversity Net Gain.

The Environment Agency suggests contacting them to discuss “an impressive environmental dataset which you may find very useful in terms of identifying where environmental improvements could be made to offset any potential losses of greenbelt land”.

Gotham Parish Council suggests new or enhanced Green Infrastructure, woodland or other appropriate planting, landscape and visual impact enhancements, biodiversity improvements and new walking or cycling routes.

Granby cum Sutton Parish Council does not consider that any appropriate improvements could be made.

Kingston on Soar Parish Council suggest the following improvements to offset the loss to the Green Belt:

- New or enhanced 'Green' infrastructure.
- Woodland or other 'appropriate' planting.
- Landscape and visual impact enhancements.
- Biodiversity improvements.
- New walking or cycling routes

Natural England recommends taking account of the principles of Nature Recovery Networks and Biodiversity Net Gain, using developer contributions.

Ratcliffe on Soar Parish Meeting suggests new or enhanced Green Infrastructure, woodland or other appropriate planting, landscape and visual

impact enhancements, biodiversity improvements and new walking or cycling routes.

Rempstone Parish Council suggests new nature reserves.

Saxondale Parish Meeting suggests an improved cycling network, off the main roads.

Thrumpton Parish Meeting suggests new or enhanced Green Infrastructure, woodland or other appropriate planting, landscape and visual impact enhancements, biodiversity improvements and new walking or cycling routes.

Urban Vision Enterprise on behalf of Linby Parish comment that when considering how to offset losses to the green belt, we suggest:

- Considering the needs of non-car users;
- Promoting reduced car journeys and catering sufficiently for this;
- Considering a range of mobilities; and
- Ensuring all development has access by walking and cycling to high quality public realm and green spaces.

Policy DES1: Design in the Linby Neighbourhood Plan supports this strategic policy area.

Summarised comments from developers

As well as responding to the question, several of the following landowners and developers promote development at particular sites; those comments are summarised separately.

Avison Young on behalf of Jelson Homes and the Wheatcroft Family suggest that key principles should include opportunities to improve public accessibility to retained Green Belt land. Opening up areas to the public that are currently in private ownership will greatly improve people's direct enjoyment and understanding of the Green Belt and its function. A development on the land at Hall Farm would open up access to an extensive new community woodland park on land which is currently inaccessible to the public.

Bidwells on behalf of Trinity College suggests additional tree planting, net biodiversity gain and improvements to the wider green space network; these could be off-site, via section 106 funds, and could be based on an area-wide strategy.

Carter Jonas on behalf of Burhill Group Limited consider that not only could the compensatory improvements outlined in the PPG at paragraph 002 be implemented to enhance the environmental quality and accessibility of the remaining Green Belt land in the Greater Nottingham Area, but such improvements should also be focus of new development and the sites allocated through the Plan.

Fisher German LLP on behalf of

- Joanna Sztejer
- Mr Malcolm Hodgkinson
- Taylor Wimpey (Land at Chilwell Lane, Bramcote)

note that while Green Belt is not strictly an environmental designation, losses can be mitigated by provision of high-quality publicly accessible open space. This can be achieved on new developments or on remaining Green Belt or greenfield land. Much Green Belt land, particularly agricultural land, is of poor environmental quality and not publicly accessible. This can be improved by ensuring high quality publicly accessible open space as part of new strategic development and/or Councils could seek to improve public access within maintained Green Belt or greenfield land, but this would be dependent on use and ownership.

Geoff Prince Associates on behalf of Hammond Farms suggests 'wider environmental improvements' and opening up land to public access.

Geoff Prince Associates on behalf of Langridge Homes Ltd suggests 'wider environmental improvements' and opening up land to public access.

JW Planning Ltd on behalf of Hall Construction Services Ltd considers that improvements could be identified by 'assessment work' and achieved by 'site-specific policy wording / legal agreements'

Marrons Planning on behalf of Mather Jamie say that improvements could include providing new parks, new routes to open up accessibility, new natural areas, and the restoration of historic landscapes and features.

Oxalis Planning on behalf of: -

- Bloor Homes Midlands
- the South West Nottingham Consortium
- Unnamed landowners and developers

proposes a fundamental review of the Green Belt.

Oxalis Planning on behalf of John A. Wells Ltd refers to locations that should be developed.

Oxalis Planning on behalf of W Westerman Ltd suggests new areas of open space.

Pegasus Group on behalf of Hallam Land Management suggests improving native species planting, improving the biodiversity value of land, improving long-term management, improving public access and recreational opportunities, and enhancing Green and Blue Infrastructure.

Planning & Design Group (UK) Ltd on behalf of The University of Nottingham proposes increasing accessibility, expanding woodland, creating habitats and providing net gains for biodiversity.

Positive Homes Ltd suggest that Green belt land that local people can't access isn't especially useful - it's just farmland. If you're going to have green belt, it needs to be for the enjoyment of the majority - i.e. parkland or similar. Otherwise it's just a field to look at as you queue to get to your house. Which is outside the green belt, because it must be preserved at all costs.

Savills on behalf of Taylor Wimpey says that more guidance on the issue is needed from the government.

Savills on behalf of Wilson Bowden Developments feels that such improvements "should be made in such a way that they do not encroach upon sites that are prime candidates for development".

Uniper UK Limited suggests 'net environmental gain', either on-site or off-site, and the provision of access to recreational areas.

William Davis says that developments will need to "address any environmental designations" and "provide access to the wider rights of way network where possible". The company points out that land that remains in the Green Belt may not be in the control of the landowner or developer and it will therefore be difficult to deliver any improvements.

Summarised comments from other organisations

Burton Joyce Climate Action Group suggests that such improvements could include wildlife corridors to link sites.

Carlton and Gedling U3A proposes an extension of Green Belt areas by 150% of the area released.

The Diocese of Southwell and Nottingham recommends to "get the general population to participate in sustaining the quality of green space", through volunteering.

Nottingham Green Party suggests the translocation of species, repair of damaged habitats and biodiversity offsetting.

Nottinghamshire Campaign to Protect Rural England considers that it is difficult to offset losses, although it may be possible to offset some habitat loss for some species.

Nottinghamshire Ramblers seek recognition of the need to rewild areas close to urban development as 'wildlife banks' to offset the major loss of biodiversity on farmland.

Nottinghamshire Wildlife Trust recommends recognising the principles of nature recovery networks, creating a variety of habitats and expanding from existing wildlife sites, with provision for long-term management.

Rushcliffe Green Party proposes creating a variety of wildlife areas, expanding from existing sites.

Summarised comments from local residents

Several responses to this question from local residents included comments on other Green Belt-related issues, which are summarised separately elsewhere.

Many local residents consider that it is not possible to satisfactorily offset losses to the Green Belt and/or that there should be no losses of Green Belt land.

Several local residents suggest that relevant improvements should include new or enhanced Green Infrastructure, woodland or other appropriate planting, landscape and visual impact enhancements, biodiversity improvements and new walking or cycling routes.

Some also emphasise the importance of long-term monitoring of any new woodland and other habitats, with “appropriate interventions if necessary”.

Several people propose that the means of achieving such improvements should be through financial contributions from developers, into a specific fund.

Several people also:

- Emphasise the importance of Blue Infrastructure
- Propose the creation of country parks in association with any new development
- Recommend the extension of buffers and corridors around SSSIs
- Propose that “an equal area of woodland to paved area should be created within any development”.

Other suggestions for improvements include:

- Playing fields
- ‘Wild garden parks’
- Royal Horticultural Society gardens
- ‘Rewilding’
- Maintaining canal towpaths
- Opening up disused railway lines to walkers and cyclists
- Creating space for the provision of a woodland burial site
- ‘Upgrading’ brownfield or urban sites to greenfield sites
- “Create twice as much as we destroy”
- Possibly this issue should be dealt with by Town and Parish Councils rather than local planning authorities
- Creating substantive urban green spaces such as the suggested Broadmarsh city centre park

Chapter Five: Working in Greater Nottingham

1. Question EMP1: Employment Land and Office Space

Do you agree that the minimum amount of employment land and office space to be provided should be based on the factors set out at paragraph 5.6?

Summarised comments from statutory organisations

Amber Valley District Council are of the view that the issues set out in EMP 1 to EMP7 would not directly impact on the District. However, they added that the potential for new office development around the proposed HS2 Hub Station at Toton and the necessary improvements to transport links to it from the surrounding area, including the potential for an enhanced bus service along the A610 corridor from Ripley and Heanor could offer readily accessible new employment opportunities for Amber Valley residents

Aslockton Parish Council considered that changes in working as a consequence of the pandemic and Brexit mean that it is unlikely things would go back to pre-pandemic practices. Similar comments were made by Saxondale Parish Meeting who questioned the need for any further office space as company employees were successfully working from home. This Parish Meeting also raised the question of what to do with surplus office floorspace in the city suggesting its possible reuse and conversion to retail or residential uses or a mix.

Barton in Fabis Parish Council, Gotham Parish Council, Kingston-on-Soar Parish Council, Ratcliffe-on-Soar Parish Meeting and Thrumpton Parish Meeting and individual Councillors sent a joint response. In relation to question EMP1 this referred to background information which had informed their response. In summary, this information included that Nottingham City is ranked the 11th most deprived district in England according to the 2019 Indices of Multiple Deprivation (IMD). Unemployment rates are higher than that of the region and nationally. Amongst other facts, the background information points out that residents in the City have lower average incomes than people who work in the City, there are higher child poverty rates and car ownership levels are relatively low. Accordingly, the respondents consider that improving the deprivation rank of Greater Nottingham should be a major focus for the Strategic Growth Plan.

More specifically these same respondents considered that in addition to the factors set out in paragraph 5.6 for assessing future employment land needs the following factors should also be included which in summary include:

- Good accessibility to the transport network and labour market
- Sites that are attractive to the market
- The availability of sites for employment use;

- Green Belt designations, in particular those to maintain openness and prevent coalescence between Nottingham, Derby and other surrounding settlements.
- Consideration of the implications of new use class E in safeguarding office floorspace for employment uses and as a factor in researching the minimum amount of employment and office space.

Burton Joyce Parish Council commented yes, but with particular emphasis on the recent changes to working practices, which will result in much less office-based working, even when the Covid19 Pandemic is no longer a factor.

Chetwynd: The Toton and Chilwell Neighbourhood Forum considered the Councils should factor in the likely scenario of more people working from home & local offices, and that some may choose to live adjacent to or above their place of work. The pandemic has shown that working from home "stretches" the space within the home, and perhaps enhanced local office space would be better. There is likely to be increased drift away from city centre working towards local working, either at home or nearby 'hot desking' facilities for those who choose not to work from home.

Linby Parish Council considered that the assessment should take into account the short, medium and long-term impacts of COVID 19 such as increased working from home and knock on effects for the demand for business space. They also considered that there was an oversupply of commercial and business space within the Parish and Gedling Borough in general and a greater understanding of the level of vacant and underused business space was required before new allocations made.

Natural England responses to both EMP1 and EMP2 was that office development should be highly accessible by public transport and that active and sustainable transport should be available to support a carbon free city.

Radcliffe on Trent Parish Council referred to the COVID 19 pandemic, which they considered, might have changed permanently the demand for office space. Conversely, they argued that Brexit might increase the need for manufacturing space. Rempstone Parish Council supports the factors for assessing future employment space set out in paragraph 5.6 of the Greater Nottingham Growth Options Document but noted that ways of working had changed as a result of the pandemic. Ruddington Parish Council argued for a new study to be commissioned.

Saxondale Parish Meeting considered none of the factors set out in paragraph 5.6 were relevant to the current or future economic landscape due to the impact of COVID 19

Summarised comments from developers

Andrew Hiorns (Town Planning Limited) representing Parker Strategic Land agreed with the factors for assessing employment land needs set out in paragraph 5.6.

Crown Estate agreed with the approach towards assessing employment land needs but also stated the policy should help communities become more self-contained by directing development to locations with employment commitments and opportunities. These comments were made in connection to their promotion of land north of Bingham (site R03).

DLP Planning for City Estates referred to the need to take into account the new Use Class E, which would allow a greater mix of uses on employment sites. This would increase the diversity of uses in both existing premises and allocated sites and add to their vitality and viability. This matter should be addressed through policy in the plan and not left for the development management process.

Geoffrey Prince Associates (for Hammond Farms) responding to Questions EMP1, EMP2, EMP3, EMP4, EMP5, EMP6 and EMP7 commenting that the issues in the chapter have been overtaken by the rapid changes in lifestyle and technological change speeded up by the pandemic. The key issues now being more working from home, impact of Brexit, reduction in air travel and development of HS2. In this context, whilst the strategic locations referred to in the document around Toton, Ratcliffe-on-Soar Power Station and East Midlands Airport may be attractive these were located in a sensitive part of the Green Belt. Focussing on Gedling Borough the respondent referred to new employment opportunities being located within the west when there was a need to meet the employment need of Arnold and Carlton. In this respect the respondent argues that land in the vicinity of Leapool off the A60 should be promoted as a business park and part of a wider mixed use scheme.

Gladman stated that the demand for office development and employment land should be assessed against the most up-to-date and relevant evidence and in this regard the ELS 2015 must be updated as part of the Local Plan process.

Marrons for Whitefields Farm agree with the approach but added employment land provision needs to be adjusted upwards in order to co locate homes with jobs, the needs of particular sectors, role of the transport network and needs of rural areas. These comments were made in connection with the promotion of a site at East Bridgford. The owners of White Fields Farm sent similar comments.

Nexus Planning on behalf of Mather Jamie, indicate that a new employment land study is needed and seek to promote land south of Cotgrave as a suitable employment led development site. In this context, they consider that regeneration benefits be added to the factors in paragraph

5.6. When considering future needs it is important that projections of job growth are not unduly constrained by short term impacts related to COVID or Brexit. Noting that Rushcliffe Borough Council was the only local authority to experience a growth in industrial and warehouse space, they consider that Rushcliffe Borough will continue to be attractive given the planned transport improvements to the A46 corridor.

Oxalis on behalf of a number of developers and landowners responded to questions EMP1 and EMP 2 stating that the omission of references to logistics was a glaring and unacceptable omission. Recent evidence from Savills details that take-up of industrial and logistics space in the East Midlands (units of 100,000 sq. ft. plus) hit record levels in the first half of 2020, reaching 4.75 million sq. ft., 115% up on the long-term average. Using the five-year average for take-up there is just 1.08 years left of supply within the region. Evidence demonstrates a clear need for more logistics space in the GN Area than previously planned for in order to respond to the opportunities. Key transport corridors along the strategic highways network, particularly along the M1, should be explored. Additional logistics space will also help meet rising demand in the sector which has just over one years' worth of supply in the region.

Savills for Gaintame and Wilson Bowden argue that the losses to existing employment sites as a result of the development of HS2 should be factored into the employment land requirements. By way of an example, they refer to Nottingham Business Park, which they estimate would, result in 37,000 sq. m. to 46,000 sq. m being taken within the HS2 corridor. Savills also considers more attention should be given to providing for industrial and warehousing land (Use Class B2 and B8).

Savills on behalf of Taylor Wimpey commented that the forthcoming Employment Land Study should set a base line position and market demand scenarios. It should not be viewed as giving a precise projection but rather a well-formed evidence based approach. They considered it likely that transport routes and connectivity to existing and proposed housing will be important locations for industry and logistics. The list of considerations at paragraph 5.6 seems quite full but an additional dynamic is whether the Councils would set out a growth agenda including employment and housing targets, which are over and above any quantitative assessment.

Savills for Wilson Bowden are of the view that there has been a short fall in the availability of good quality manufacturing and distribution sites in the Plan Area and this has influenced the level of take up. They consider that little mention is made of the requirements for strategic distribution and local distribution logistics. The COVID pandemic has increased demand for distribution services and it is felt unlikely demand would fall to pre-covid levels. They also argued that there was a need to plan for economic development that provides flexibility for employment in what could be a prolonged recession.

Stantec on behalf of Barwood Homes in response to EMP1 and EMP2 are promoting their clients site on the edge of Cotgrave (adjacent the Hollygate

Lane allocation in the adopted Local Plan). Cotgrave is a key settlement and suitable location, which offers a range of existing shopping and community and recreational facilities, which the new residents from the proposed development at Hollygate Lane will support. Stantec on behalf of Barwood Land stated that they had no comments to make in relation to the quality of employment sites to be accommodated in the plan.

Whitefields Farm agree with the approach but added employment land provision needs to be adjusted upwards in order to co locate homes with jobs, the needs of particular sectors, role of the transport network and needs of rural areas. These comments were made in connection with the promotion of a site at East Bridgford.

Uniper Ltd. response was that consideration needs to be given to the aspirations and objectives of the Development Corporation whose remit includes the potential delivery of growth at Toton, Ratcliffe-on-Soar Power Station and the East Midlands Airport. The delivery of these sites would have a key role in diversifying the economy. In particular, they considered that the scale and location of the Power Station site sets it apart from other potential sites and this should be factored into the evaluation of employment land needs.

Summarised comments from other organisations

Carlton and Gedling U3A commented in connection with EMP1 and EMP 2 that whilst the approach towards assessing future employment space outlined in paragraph 5.6 looked scientific the Councils should explore various future scenarios for the demand for employment space setting maximum and minimum limits.

The Diocese of Nottingham and Southwell stressed the need to anticipate changing demand and pointed to the success of people working from home during the COVID 19 lockdown. They ask how maximum efficiency can be made of employment space whilst making the individual worker feel valued.

Nottingham Local Areas Access Forum considered that accessibility be added to the list in paragraph 5.6.

Nottinghamshire Campaign to Protect Rural England agrees the 2015 ELS Study, is out of date and conclude that it is unwise to assume more employment land will be needed - given current trends; less demand is far more likely.

The Nottingham Green Party generally agreed with the factors for assessing future employment floorspace needs but emphasised that the amount of floorspace per worker or employment floorspace densities is reviewed.

The Nottinghamshire Ramblers Association would add access by sustainable and Active Travel. Attractive, safe routes that encourage people to move away from car travel should be promoted.

Pedals considered that accessibility be added to the factors set out in paragraph 5.6 particularly by active and sustainable travel accompanied by facilities for safe cycle parking for example. Nottingham Active Local Access Forum made a similar point.

Rushcliffe Borough Councillors considered a new employment land study was required. They also considered that the amount of employment land could not be decided until we all get back to work and see what new working patterns are and felt there is a lot of room for new ways of working such as local office space hubs.

Rushcliffe Borough Councillors (East Leake Ward Members) also considered the COVID 19 Pandemic had the potential to make sweeping changes to employment and the spaces required for it.

Summarised comments from local residents

A large majority of residents responding mentioned the COVID 19 pandemic required a fundamental rethink of employment space needs particularly in the light of more working from home, greater use of technology and possible recession suppressing demand. The uncertainties caused by Brexit and its implications for future employment prospects was also mentioned by a number of residents leading to future uncertainty about employment prospects although some respondents considered that BREXIT could result in a potential resurgence in the manufacturing sector citing the UK Government's aspirations to rebalance the national economy. Numerous respondents stated a new employment land study is required.

A number of residents emphasised the need for a new study is carried out to assess employment floorspace requirements and to look crucially at changes and assumptions about homeworking and worker per unit floorspace. One respondent called for a flexible policy response in connection with the provision of future employment floorspace and for close monitoring of space taken up. One respondent felt that the factors outlined would perpetuate existing growth patterns to the detriment of regenerating the City.

Some residents considered the factors for assessing future employment space in paragraph 5.6 were valid. Others considered additional factors should include the availability, or intended provision, of adequate transportation links (road, rail, tram, cycle etc.) for both the proposed types of industry and commerce and for the employees who will work within it. One resident emphasised the need to recognise that Nottingham has good cycle ways, and potential to improve and expand the cycleway network. A further resident questioned where is the evidence that new residents work locally? It is a nice concept but in reality, it is likely that zero residents work locally.

2. **Question EMP2: Office Development**

Should we focus office development in Nottingham City Centre or should it be at other accessible locations such as around the HS2 Hub Station or at Sustainable Urban Extensions?

Summarised comments from statutory organisations

The joint response from Barton in Fabis Parish Council, Gotham Parish Council, Kingston-on-Soar Parish Council, Ratcliffe-on-Soar Parish Meeting and Thrumpton Parish Meeting confirms the approach should be to focus office development in Nottingham City Centre and refers to their response to EMP1 in support of this view (summarised above). In brief, their view is that development including office development should be focussed in Nottingham City to help address the high levels of deprivation in the area.

Burton Joyce Parish Council favoured concentrating office development within Nottingham. They also referred to their response to question OS4.

Chetwynd: The Toton and Chilwell Neighbourhood Forum thought new office development should not be in the city centre. The Toton Innovation Campus at the Hub Station offers a significant opportunity for employment, mainly office based.

Granby cum Sutton Parish Council mentioned that if the aim is to reduce travel then sustainable urban extensions would be the solution and in addition prioritising the City Centre would be vital post Covid and that HS2 was unlikely to impact the region until 2030.

Historic England advised that the Plan will need to ensure the historic environment has been fully considered in respect of preferred options for sites for office development. Historic England recommend that any site assessment follows the five steps set out in our advice note HEAN 3: The historic environment and site allocations in local plans as well as guidance in GPA3: The setting of heritage assets.

Linby Parish Council considered that office development should be focussed on the City Centre and at HS2 Hub

Ravenshead Parish Council responded to this question saying that whilst the City Centre may well remain a focus other options should be considered including better ways of working especially home working with improving IT infrastructure and also office development in accessible sustainable urban extensions.

Rempstone Parish Council stated it supports office development at the HS2 Hub at Toton.

Saxondale Parish Meeting considered that the only areas that will pick up from Covid 19 are the City Centre and those around regenerating transport hubs, such as the HS2 links and that no other area should be considered.

Summarised comments from developers

Andrew Hiorns (Town Planning Ltd.) for Parker Strategic Land stated that a range of locations for offices should be planned for and in this connection were promoting land east of Cotgrave which may be suitable for some employment uses along with housing development.

Bidwells on behalf of Trinity College supports office development in the City Centre. However, it is good to have an element of employment land-use as part of an SUE to ensure that it is a place where new residents can live and work and create sustainable communities.

DLP Planning Ltd. on behalf of City Estates sought to promote the Total site at the Colwick Industrial Estate saying that it was located in a highly sustainable location ideally located to accommodate a mix of uses including offices, which did not wish to locate in the City Centre and wanted to stay close to the workforce. The respondent considered that the pandemic was likely to encourage some employers to review their office requirements and changing working practices and allocating the Total site for a mix of uses including class E would be an ideal opportunity. City Estates also argued for more emphasis on meeting employment needs including offices on existing industrial estates through policies encouraging the new E Class to be located there.

Gladman referred to its response to EMP1, the demand for office development and employment land should be assessed against the most up-to-date and relevant evidence and in this regard the ELS 2015 must be updated as part of the Local Plan process.

Kase Aero Ltd stated that the pandemic has obviously distorted all the assumptions now. Nottingham City Centre should be the main focus for office development now, not in the more remote areas.

Nexus Planning for Mather Jamie in connection with promoting land south of Cotgrave also stated that focussing just on the City Centre is not a sustainable strategy to ensure that office development is adaptable to changing work practices nor meet the specific locational requirements of specific sectors, wider regeneration priorities or economic potential. They promote sustainable locations along the A46 corridor, which should be considered in the GNSP. Furthermore, a focus on Nottingham City Centre does not take into consideration specific locational requirements of different sectors, wider regeneration priorities, or economic potential such as the A46 Corridor initiative.

Oxalis on behalf of a number of clients responded to both EMP1 and EMP2 which is summarised above about the need to promote plans for the logistics sector and that the growth of the logistics sector can help compensate for the loss of jobs in other sectors and there is evidently space for growth within the Greater Nottingham Area logistics market.

Andrew Hiorns (Town Planning Ltd.) for Parker Strategic Land considered that a range of locations should be considered and whilst the City Centre should be the focus other locations such as HS2 offered opportunities to boost investment. Sustainable urban extensions also offer the opportunity for B1 type developments that can meet more local requirements. Larger developments may be appropriate in locations with strategic transport connections. In this context land at Catstone Green and Cotgrave East is being promoted.

Savills for Taylor Wimpey supported office development being focussed in the City and town centres but also considered that Sustainable Urban Extensions were also suitable for some office development.

Bidwells acting for Trinity College made the same point but adding that provision should be based on evidence of need for office-based employment at the location in question.

Savills for Gaintame referred to the implications of the HS2 making the area north of Broxtowe between the M1 and the A610 more attractive. The respondent also considered that good quality premises and sites were in short supply and that this location was favoured by businesses demanding low rise, flexible office space in out of town locations attributed to the effects of COVID. Such a location would be more accessible to home and open spaces than the City Centre.

Savills on behalf of Wilson Bowden indicated that as well as Nottingham City Centre, existing established employment locations, such as Blenheim Industrial Park, should be considered for their expansion opportunities prior to new locations being assessed. They also asked that the impact of HS2 be taken into account and that post COVID there would be continued demand for low rise, flexible business space in out of town locations. Savills made similar points in respect of the Nottingham Business Park again asking that the impact of HS2 be taken into account both in relation to stimulating demand and specifically in the case of the Nottingham Business Park that the land immediately to the north would be suitable for expansion to make good losses because of the HS2 construction.

Summarised comments from other organisations

Nottinghamshire CPRE emphasised the need to focus on the City Centre and Local Centres and not create other competing locations. **Pedals and the Burton Joyce Climate Action Group** also agree with focussing on the City Centre and within urban areas as it has the best links for sustainable travel especially when combined with restrictions on motor traffic for air quality and carbon reduction reasons. Generally, it presents the opportunity

for shorter journeys from most areas and the greater opportunity for active travel. **The Nottingham Open Access Forum** also thought concentrating development in the City Centre was the best option and referred to the concept of achieving the 15-minute city.

Nottingham Green Party felt it would depend on the environmental impacts of office development in the different locations dependent on the distance employees have to travel to work. Transport is not the only consideration as co-location of homes, jobs services and facilities was important.

Pedals stressed the city centre has in general the best links for sustainable travel especially when combined with restrictions on motor traffic for air quality and carbon reduction reasons. Generally, it presents the opportunity for shorter journeys from most areas and the greater opportunity for active travel. Good cycling and walking access should be an integral part of any development proposals, including in the HS2 Growth Zone, with good coherent links to the rest of the Greater Nottingham cycling and walking network, and active travel routes in surrounding areas.

Tollerton Against Backdoor Urbanisation (TABU) opined that the demand for office space would fall following the pandemic but if it is required then it should be focussed in the City Centre and at the HS2 Hub location, near railway stations and the M1 Motorway.

Rushcliffe Borough Council Councillor thought it could be useful to spread future office space development around established transport links.

Rushcliffe Borough Council (East Leake Members) considered it likely that the need for office accommodation will be reduced as working from home becomes more the norm. Existing office accommodation in the City may need to be converted to residential. Office facilities may be needed closer to where people live, with local business hubs needed to provide support e.g. hot desking, meeting rooms, printing facilities, advice.

Rushcliffe Borough Council (Gotham Ward Councillor) see comments for **Barton in Fabis Parish Council** (above).

Summarised comments from local residents

A number of residents argued for reviewing the amount of office floorspace requirements generally and in Nottingham City Centre because of the COVID pandemic. Some respondents called for more action to support the City and town centres and this would support regeneration. A number of respondents considered that there would be sufficient office floorspace in Nottingham City to meet likely demand and emphasised the importance of renovating and reusing the vacant office stock. Vacant office stock should be carefully monitored to ensure that there is not too much excess stock.

In terms of the location of office development local residents generally supported greater concentration in Nottingham City centre which they

considered to be the premier business location and most accessible to the workforce. One resident considered it vital to focus on the City Centre with its existing NET Links and not in urban extensions. However, conversely some residents supported a more dispersed approach in particular to locate office development in locations linked to good transport routes including the HS2 Hub Station, Ratcliffe on Soar Power Station and locations connected to the NET. In this respect, they felt that focussing on the City would lead to more congestion and increased travel times. Respondents also referred to the need to ensure sustainable transport infrastructure around office locations would be in place at the right time. Respondents also remarked that in the light of the COVID pandemic it might be appropriate to spread office development around including small office hubs closer to where people live.

Some respondents considered that Nottingham lacked sufficient good quality office space. One response compared Nottingham to other core cities stating that Nottingham lacked office space in comparison with for example, Bristol, Leeds and Sheffield with only one good quality site at NG2. The suggestion was that Nottingham should build upwards with office space, hotels and apartments. More focus should be placed on encouraging industrial and commercial development at junctions 24 and 26 of the M1 Motorway.

Others expressed support for office and other employment development to be located at Toton.

3. **Question EMP3: Driving Innovation and Supporting Business Growth**

How can we drive innovation and encourage start-up companies, including expanding the role of the universities in the area's economy?

Summarised comments from statutory organisations

Barton in Fabis Parish Council, Gotham Parish Council, Kingston-on-Soar Parish Council, Ratcliffe-on-Soar Parish Meeting and Thrumpton Parish Meeting in their joint response referred to using the model provided by BioCity and MediCity to create more innovation hotspots with easy access to the Universities. They also made the point that the plan should focus on stimulating innovation amongst existing employers in the city to raise skill levels generally among City residents.

Burton Joyce Parish Council considered that if Greater Nottingham has good transport links, attractive sites in a city centre which is a pleasure to live in, or outlying settlements not spoilt by over-development, and effective Green-Blue infrastructure, it will encourage the setting up of innovative enterprises. In much of this area, including Burton Joyce, improvements to mobile phone signals and introduction of superfast computer broadband speeds are urgently required. The future of individual entrepreneurs and

larger business will increasingly depend on home-working, so all efforts by local Councils to improve the situation would be highly beneficial.

Chetwynd: The Toton and Chilwell Neighbourhood Forum considered that whilst universities are important, not all jobs will require degree level education. It will continue to be important to provide other workforce training opportunities e.g. via apprenticeships and provide a Skills & Training Academy at the Innovation Campus.

Historic England advised that the Plan might wish to consider the option of providing for the reuse and appropriate adaptation of any heritage assets currently used for traditional manufacturing industries to provide for start-up companies in the future should markets dictate that direction.

Linby Parish Council stated the plan needs to support innovation and the role of small and micro businesses and to ensure the necessary infrastructure is provided to support homeworking including 5G and superfast broad band.

Saxondale Parish meeting referred to the need for self-employment and start-up businesses in local urban areas such as Bingham, Cotgrave, Ratcliffe on Trent and Ruddington, which already have some business infrastructure. They also promoted the role of the universities including through establishing links to local schools.

Summarised comments from developers

DLP Planning for City Estates commented that given the likelihood of falling demand for industrial space a more flexible approach to uses other than B1 and B8 should be permitted on sites such as the Colwick Industrial Estate to allow more flexibility and a mix of uses on employment land in order to help drive innovation and supporting business growth.

Andrew Hiorns (Town Planning Limited) on behalf of Parker Strategic Land contend that the key role of the plan should be to provide opportunities for start-up premises and promoted Catstone Green as a potential site. They also pointed to providing sites alongside the Universities to offer potential for spin out companies in association with flexible planning policies and potential use of Local Development Orders. Advancing the use of technologies through performance standards for low and zero carbon targets in the building industry could also stimulate growth in the local supply chain.

Planning and Design Group for Nottingham University recognised its important role in working in partnership in order to boost economic growth and the need for student accommodation and campus expansion needs to be considered in the plan. The University also has a role in attracting the best students, support employers and assist in graduate retention. The University is also seeking to promote land at Bramcote, which provides an opportunity to support the delivery of economic growth aligned with the regional high-speed rail hub at Toton by offering expertise and direct

investment but also offering up their land asset at Bramcote to assist in the delivery of housing in this area.

Savills on behalf of Taylor Wimpey stressed the need for partnership between the public and private sectors to deliver business and innovation growth. There was also a call for a shared resource across the Councils in terms of business support rather than separate teams within each Council. A sufficient quantity and type of space is needed based on evidence.

Savills for Wilson Bowden sought to promote their site at New Farm, Nuthall that could encourage start-up companies by extending the range of sites and premises in the area. Savills point out that the existing Blenheim Industrial Estates currently has just two vacant units and more business space is needed in the area.

Uniper Ltd. based at Ratcliffe-on-Soar Power Station site includes its own Energy Academy delivering high quality technical training. While Uniper is currently leading the Universities in realising the International Centre for Decarbonised Futures concept, the likelihood is that the Centre will be established regardless of Uniper activity. As landowner of the Power Station site, they are in a privileged position to collaborate openly and proactively for the successful development and delivery of this very important concept for the benefit of Greater Nottingham.

Summarised comments from other organisations

Nottinghamshire CPRE support the development of appropriate small scale research and development facilities in the countryside.

Tollerton Against Backdoor Urbanisation (TABU) considered that start up and incubator units could be provided within the University campuses and at themed sites at Toton and Ratcliffe-on-Soar.

Ratcliffe-on-Soar Parish Councillor echoing the joint response (see Barton in Fabis Parish Council above) also referred to using the BIOCity and MediCity models to create more innovation hot spots.

Rushcliffe Borough Councillor referred to the joint response see Barton in Fabis Parish Council above.

Summarised comments from local residents

Local residents mentioned the need to support SMEs through providing for start-up companies and growing local economies. One respondent queried why there was a question on how to encourage innovation and support SMEs in the document, which the respondent considered, was more of a matter for economic development strategies.

One local resident emphasised driving innovation by working closely with Derby as the economies of the two cities are closely meshed. Another mentioned giving 1 to 2 years rate relief for start-up companies and called for

the LEP area to include Nottingham City and BioCity. A further comment that effort should be made to attract companies into the area who were seeking close links to the two Universities this could include placements for university students and integrate courses with business needs. Incubator units on existing campuses and new theme parks on brownfield sites would be a great way to drive innovation and supporting growth if this is done by working closely with universities. Similarly, the BioCity and MediCity models should be used to promote innovation hotspots. Another comment was to learn from the experience of development linked to Cambridge University.

Developer contributions towards investment funds to assist start-ups including those engaged in the green economy. A further point was that in cooperation with the universities more could be done towards encouraging business growth in the green economy in general to combat climate change.

Respondents also suggested start up premises, shared workspace and incubator units. Others emphasises the prioritisation of skills and training for local people and furthermore such training and support needed to be dovetailed to the needs of particular groups in the community including the young, ethnic minorities and older workers.

4. **Question EMP4: Regeneration Priorities**

What should the key regeneration priorities be, and where?

Summarised comments from statutory organisations

Aslockton Parish Council stated there should be a focus on urban and rural regeneration of town and local centres emphasising the need for a sense of place and provision of local facilities.

Barton in Fabis Parish Council, Gotham Parish Council, Kingston-on-Soar Parish Council, Ratcliffe-on-Soar Parish Meeting and Thrumpton Parish Meeting in their joint response said the focus should be on the area of the Nottingham conurbation north of the River Trent where levels of deprivation were higher. They also noted that the City had lost a lot of office space to residential and thought that research was needed to establish whether this has been beneficial or detrimental to the local economy.

Burton Joyce Parish Council stressed the need to reuse derelict city-centre land formerly occupied by industry and redundant commercial space, plus former colliery sites.

Chetwynd: The Toton and Chilwell Neighbourhood Forum mentioned good education & skills training is the best route out of poverty. Therefore, better support for schools in disadvantaged areas is required both for pupils and parents. Better paid job opportunities are required, as well as improved quality housing. Brownfield sites should be developed/used first to provide well paid jobs with appropriate training support for the workforce.

Granby cum Sutton Parish Council emphasised the need for the continued redevelopment of brownfield sites.

Historic England made a similar point to their response to EMP3 about the option of providing for the reuse and appropriate adaptation of any heritage assets

Ravenshead Parish Council made no comments on this question.

Homes England support the regeneration priorities set out in the consultation document strategy especially in relation to the City and town centres.

Ruddington Parish Council mentioned smaller business units with lower rates, buildings that can house a number of small units within for example Flying Horse Walk, instead of building or redeveloping the bigger shopping malls.

Rushcliffe Borough Council Councillor made the same comments as Ruddington Parish Council above.

Saxondale Parish Meeting referred to their response to question EMP 4 about reusing vacant office floorspace to provide managed workspace to help encourage self-employed and start-up businesses. In relation to EMP 5 they emphasised the need to encourage self-employment and start-up businesses in local urban areas.

Summarised comments from developers

Andrew Hiorns Planning for Parker Strategic Land stated that the focus should be on the areas with the greatest needs including areas to the west and south of the City. There are opportunities to gear the opportunities that arise out of strategic growth to the needs of local areas. Reference is made to the site they are promoting at Catstone Green. They also supported appropriate growth towards settlements that have an imbalanced socio-economic structure or need for regeneration such as Cotgrave. In particular, they refer to unlocking the potential of the A46 corridor at junctions such as Cotgrave for manufacturing, logistics and agricultural services. Regeneration should focus on areas of greatest need and at Cotgrave can build on the successes that have already been achieved in making the town a sustainable and attractive place to live and work.

DLP Planning for City Estates referred to their responses in relation to EMP 1 to 3 stating that policies should allow more flexible and diverse mix of uses on existing industrial land including Colwick Industrial Estate in particular the policy context should recognise Class E.

GEO Green Power and GEO Pura are pleased to support the strategic development strategy of greater Nottinghamshire. They have identified an initial 31.10-acre, low impact site that is located directly off the A46 near

Hickling Pastures and would like this site to be considered as a potential location for commercial planning consent as part of the emerging strategic development plan.

Hollins Strategic Land in support of their proposed alternative site west of Aslockton, considered that Aslockton is within an area of high deprivation and residential opportunities for residential development at such villages should be taken which would also support local businesses and sustain services and facilities.

Kase Aero Ltd. felt that Nottingham City should now be the main focus of key regeneration. The Edwalton area of Rushcliffe has never suffered from 'degeneration'.

Nexus Planning on behalf of Mather Jamie and CEG referred to the need to focus on deprivation in Nottingham City and also on those settlements that have a socio economic imbalance or regeneration needs and this should be reflected in the planned location of sustainable urban extensions.

The Pegasus Group for Hallam Land Management refers to the Midlands Connect Transport Plan for HS2 highlights the vision for the Ratcliffe-on-Soar power station site to become a zero carbon technology and energy hub and the site is proposed for inclusion as part of the proposed East Midlands Development Corporation area. The power station site should therefore be recognised as a key regeneration priority in the Strategic Plan. It is therefore expected that the redevelopment of the power station site will deliver significant numbers of new employment opportunities, yet there is no readily available workforce in close proximity to the site; and this could be addressed by delivering housing on the site at Kingston-on-Soar which they are promoting.

Severn Trent emphasised that sustainability is the key consideration and this would include sustainable surface water management especially the provision of SuDs which should be multi-functional bring multiple benefits enhancing the local environment. Regeneration should result in development that minimises the use of water through water efficient design.

Savills on behalf of Taylor Wimpey argued that regeneration should be public sector lead often working in partnership. The plan should put in policy and associated funding to bring about regeneration but this should be alongside private development and not instead of it.

Uniper supports the objectives of the Development Corporation and in particular redevelopment of the power station. This site is ideal for redevelopment considering its power generation heritage, excellent connectivity and available infrastructure in the area. Therefore, the Ratcliffe-on-Soar Power Station site must be a key regeneration priority and is previously developed land.

Summarised comments from other organisations

Burton Joyce Climate Action Group stressed the need to train people.

Nottingham Green Party identified the area between the City Centre and the railway station should be a focus for regeneration and potentially served by a district heating scheme and use of green technologies such as the production and installation of insulation and solar panels etc.

Summarised comments from local residents

Some local residents suggested providing 1-2 years rate relief for start-up companies and to expand the LEP area to include Nottingham town centre and BioCity. Smaller premises in areas with lower rates and rents was recommended. Other respondents mentioned the need for mentoring, education and training programmes including those tailored to the needs of particular groups. Training specifically related to the low carbon economy was advocated.

In the context of the conurbation's experience of deindustrialisation some respondents remarked that the area was over reliant on services and that a rebalancing of the local economy was needed and renaissance of manufacturing.

Respondents also mentioned the need to redevelop all brownfield and underused vacant urban land. Given the COVID pandemic and its implications for more home working some respondents mentioned the need to regenerate local centres including in the urban areas and villages.

Respondents said the focus should be on those areas especially in Nottingham City experiencing high levels of deprivation, which are well related to existing infrastructure with opportunities for redevelopment and regeneration. Regeneration in the City Centre was also favoured by some. One respondent mentioned the need for business opportunities around high-density, poor quality housing areas to drive up employment opportunities and standards of living.

One respondent questioned why this question was in the document as it relates more to economic development strategies.

5. **Question EMP5: Climate Change**

How can we encourage businesses to address Climate Change and mitigate their environment impacts?

Summarised comments from statutory organisations

Aslockton Parish Council referred to providing jobs close to homes in disadvantaged areas thereby reducing the need to travel.

Barton in Fabis Parish Council, Gotham Parish Council, Kingston-on-Soar Parish Council, Ratcliffe-on-Soar Parish Meeting and Thrumpton Parish Meeting in their joint response referenced data from the ONS which

showed that the vast majority of businesses employed less than 50 people. It is these businesses that need to drive up skills, productivity and wages. SMEs should be incentivised to invest in “Green Technology” to reduce waste and emissions and save energy. The D2N2 programme should invest in advisers to support businesses and identify opportunities for savings and efficiencies and develop this growth industry locally.

Burton Joyce Parish Council considered that this is primarily a matter that must be dealt with uniformly at national level, and local Councils can exert combined pressure to secure improved legislation. Reliable and thorough waste collection and recycling would be a helpful contribution, including restoring local recycling points

Chetwynd: The Toton and Chilwell Neighbourhood Forum referred to encouraging the co-location of jobs, homes, services and facilities to reduce the need to travel. Use of green energy, and use of Modern Methods of Construction when building new facilities. Energy efficient homes & buildings and encourage the use of green roofs and/or green walls.

Derbyshire County Council commented that greater reference should be made to the provision of active travel routes for utility purposes, including travel to and from work, school, shops etc., ideally integrated with blue-green infrastructure. Co-location of businesses, workplaces and residential areas, to minimise the need to drive to work. Ensure all new businesses adhere to a travel hierarchy, to eliminate unnecessary workplace journeys, and ensure workplace and commute journeys are undertaken as sustainably as possible. This is highly dependent upon the provision of good GBI, including cycling and walking networks. Encourage local recruitment, discourage long (car based) commutes, i.e. avoid building residential developments based on good road connections, as this will encourage more unsustainable travel.

Granby cum Sutton Parish Council considered that planning permissions for new businesses should be conditioned requiring the business to address climate change.

Linby Parish Council were of the view that promoting working from home and innovative working patterns; ensure where employment land for commercial uses including offices is located, it is near to population centres; support small and micro-based businesses; and promote sustainable travel to work methods.

Radcliffe on Trent Parish Council considered this was more of a matter for Central Government although the Parish added that the plan could focus on small businesses to reduce the impact of distribution miles.

Ravenshead Parish Council made no comments on this question.

Saxondale Parish Meeting considered that in relation to addressing climate change local authorities have a role to play but their powers are currently limited.

Severn Trent reiterated that processing water for consumption and then processing wastewater utilises a significant amount of energy, by ensuring that developments are designed to be water efficient to reduce the quantity of water that needs to be processed, SuDS and the Drainage Hierarchy will also assist in reducing the processing need.

Summarised comments from developers

Andrew Hiorns Planning representing Parker Strategic Land consider that similar design and performance standards should be applied to new business space as would apply to housing and other development, where projects can be viable.

DLP Planning Ltd. for City Estates mentioned the need to link jobs to housing accommodation and high frequency transport links, changing work practices reducing the need to travel and more branch offices. This could be facilitated by providing more flexible employment uses on existing estates including class E allocation sites.

Savills for Gaintame view is that by making provision for new employment opportunities modern purpose built business accommodation would be made available with reduced impact on the environment and respond to climate change. The Building Regulations will be the best way to achieve the objectives of carbon control and efficiency in the buildings themselves. The same comment was made on behalf of Wilson Bowden.

Pegasus Group for Hallam Land Management considered that the Strategic Plan should require businesses and employment land developers to consider how the workers will travel to work. Whilst there are various, recognised travel plan measures to encourage travel by sustainable modes, planning new strategic development proposals to co-locate employment areas and new homes will address climate change issues from outset.

Savills for Taylor Wimpey considered it is for business to address climate change and mitigate environmental impacts requires a review across the services provided by the partner authorities and to engage with business to understand their needs and how a number of potentially small measures can build-up to a bigger positive effect.

Uniper considered this could be supported by other promising options such as the establishment of the International Centre for Decarbonised Futures at the Ratcliffe-on-Soar Power Station site.

Summarised comments from other organisations

The Carlton and Gedling U3A commented specifically on flood risk by stating Councils should refuse planning permissions in areas threatened by flooding due to the increasing incidence of extreme weather events.

The Nottingham Green Party suggested that business are assessed for their carbon footprint and league tables produced to give good publicity.

Nottingham Local Access Forum, Pedals, Rushcliffe Green Party and TABU referred to the co-location of jobs and homes, to encourage employers to locate where active and sustainable travel are possible and make provision within the work place for secure cycle parking, showers and lockers for those choosing active travel.

Nottinghamshire Ramblers Association made similar comments to those immediately above advising that the authorities should locate development where active and sustainable travel are possible along routes with good air quality. To make provision within the work place for secure cycle parking, showers and lockers for those choosing Active Travel.

Tollerton Against Backdoor Urbanisation (TABU) stated that new businesses and homes should be located near transport infrastructure, including good public transport.

Rushcliffe Borough Council Councillor see comments by Barton in Fabis Parish Council above.

[Summarised comments from local residents here.](#)

A number of local residents responded to this question. Comments included applying high low carbon standards such as Passivehaus Standards set out either in policy or by conditions. Other comments included encouraging the use of electric vehicles, providing electric vehicle charging points and generally raising awareness about the negative impacts of climate change. The need to encourage walking, cycling and public transport to cut carbon emissions was also stated. A number of respondents said to continue to work from home.

Encouraging the green economy for example in green technology such as electric vehicles and charging points and the use of greener energy. Incentivising business to reduce their carbon footprint and adopt more sustainable ways of working. Discouraging parking provision in new business premises and ensuring good connection to public transport, cycling routes and walking. One respondent suggested publishing league tables indicating how businesses were performing against low carbon agenda and as a means of promoting awareness of which businesses are performing well.

One respondent was not convinced about the co-location of jobs and homes bringing sustainability benefits as they considered the job market was too complex with many people having the choice to commute long distances. Another resident considered this should not be a priority area as business was already focussed on this issue. The Councils should also mitigate the environmental impacts by avoiding development on Flood Zones (high flood risk areas). One resident mentioned applying Environmental Permitting regulations.

6. **Question EMP6: Safeguarding Employment Land**

Should we continue to safeguard good quality employment sites and release sites of lesser quality, unless they contribute to regeneration?

Summarised comments from statutory organisations

Barton in Fabis Parish Council, Gotham Parish Council, Kingston-on-Soar Parish Council, Ratcliffe-on-Soar Parish Meeting and Thrumpton Parish Meeting in their joint response stated that the assessment of “good quality” should be set against the objectives of this plan. Reducing deprivation, improving skills, and increasing productivity.

Burton Joyce Parish Council thought flexibility is likely to be required, and the re-designation of sites from those providing employment to the provision of housing could have positive effects.

Linby Parish Council agreed with the approach subject to evidence of need and avoiding an oversupply or lack of sites that support a range of business and employment opportunities.

Chetwynd: The Toton and Chilwell Neighbourhood Forum replied by stating yes they supported safeguarding key employment sites.

Ravenshead Parish Council agreed that many historical employment sites were no longer fit for purpose and often in central locations and suitable for affordable housing.

Ruddington Parish Council generally agreed with the approach to safeguarding employment sites.

Saxondale Parish Meeting considered that due to the COVID 19 pandemic the safeguarding of employment land needed a rethink.

Summarised comments from developers

Andrew Hiorns (Town Planning Ltd.) for Parker Strategic Land supported the need to maintain sites of importance for employment unless they are of poor quality, have environmental issues that make them unsuitable and constrained or where the alternative use provides significant benefits over that achieved by continuing in employment use.

Crown Estate supported the approach of protecting good quality sites. Where sites are “lost”, the aim should be to maintain employment through mixed-use development or make complementary provision elsewhere.

DLP Planning for City Estates argued that there was a good case for maximising the use of existing industrial estates through allowing more

flexibility and a greater range of uses and policy to designate and allow for class E.

Kase Aero Ltd. supported the approach saying it is right to safeguard good quality employment sites.

Savills on behalf of Taylor Wimpey supported safeguarding of better quality of site but it should not be a blanket approach.

Uniper agrees with the approach and the existing power station site should be released from the Green Belt for redevelopment including employment.

Savills for Wilson Bowden considered Blenheim Industrial Estate should be safeguarded for employment uses with further land allocated to the west to extend this successful employment site. Similarly, Nottingham Business Park should be safeguarded and further land allocated to the north for its expansion.

Summarised comments from other organisations

Beeston and District Civic Society noted that there was great uncertainty at present but considered there was a case for releasing lower quality sites unless they contribute to regeneration.

Carlton and Gedling U3A considered there was little point in safeguarding sites under the present circumstances.

The Nottingham Green Party agreed with the approach subject to regular review. Similarly, the **Nottinghamshire CPRE** considered that sites which had not been occupied for a long period should be reused for other purposes but to carry out a separate assessment before allocating these sites for housing as they may be remote from services.

Rushcliffe Borough Council Councillor made the same comments as Barton-in-Fabis Parish Council above.

Rushcliffe Borough Council Councillor agreed with the approach.

Summarised comments from local residents

There was a number of comments that supported the principle of safeguarding land for employment uses provided it was of good quality or supported regeneration. However, some respondents thought that any employment land that was vacant or under used should be redeveloped for other uses especially residential as this would make the best use of land.

A number of local residents also referred to the impacts of the COVID 19 pandemic stating that it was difficult to say with the increase in homeworking or that safeguarding needed a complete rethink in the light of the pandemic. Others remarked that the pandemic would lead to more vacant office and retail space including in the City Centre, which could be reused or converted

into residential uses. Some respondents mentioned the need for more start up premises to be provided.

7. **Question EMP7: Rural Area**

How can we support rural diversification?

Summarised comments from statutory organisations

Barton in Fabis Parish Council, Gotham Parish Council, Kingston-on-Soar Parish Council, Ratcliffe-on-Soar Parish Meeting and Thrumpton Parish Meeting in their joint response referred to the provision of high-speed internet access and training however, they considered this is not a priority currently.

Burton Joyce Parish Council thought that by ensuring that redundant farm buildings are used for productive purposes rather than isolated housing; and that marginal land is returned to a natural state, preferably with public access. Reference is also made to improving rural broadband speed.

Chetwynd: The Toton and Chilwell Neighbourhood Forum stated that planning policies should encourage appropriate diversification through re-use of otherwise disused buildings to support the local economy and provide job opportunities locally.

Granby cum Sutton Parish Council considered that developers should be required to specify the number of jobs being created in the context of proposals for rural diversification schemes and that in the past experience suggests this evidence had been lacking.

Historic England advised that the option of providing for the reuse and appropriate adaptation of any heritage assets in rural areas is considered in order to support rural diversification and references their guidance on caring for the rural heritage.

Linby Parish Council and Radcliffe on Trent Parish Council made similar comments about the need to improve broadband speed in rural areas. Linby Parish Council emphasised there is a need to deliver communications infrastructure, including 5G and super-fast fibre broadband and referred to Policy EMP1 High Speed Connectivity in the Linby Neighbourhood Plan, which supports this.

Papplewick Parish Council is pleased to note that the sentiment to support development of the rural economy is highlighted in the document however; implementation needs to recognise this and not be driven by short-termism such as the immediate needs of developers needing to show an immediate profit rather than for long-term investment and development.

Ravenshead Parish Council made no comments on this question.

Radcliffe on Trent Parish Council referred to the need to improve broadband speed in the more remote areas.

Saxondale Parish Meeting referred to diversification, improve facilities across rural or remote areas, including transport links and ensuring fibre broadband was available to all areas.

Summarised comments from developers

Andrew Hiorns Planning for Parker Strategic Land considered rural diversification depends on farms and other rural businesses being able to change the use of rural property to ensure the continued viability of their business and to ensure continued provision of sustainable employment to local people.

Geoff Prince on behalf of Langridge Homes stated the A60 Mansfield Road corridor can offer the greatest opportunities to bring about jobs growth in Gedling. In this context, they promote a new employment park in the vicinity of Leapool island as part of a mixed used scheme extending from the edge of the built up area to Lime Lane on the east side of Mansfield Road. This concept should be given equal weight to other opportunities to the south and west of the Greater Nottingham Area in order to ensure a more balanced and sustainable approach to developing the economy across the area. At the same time appropriately funded transport infrastructure measures should be included as part of an overall package of measures to make this an attractive corridor for growth.

Hollins Strategic Land in support of their proposed alternative site west of Aslockton, considered that the site could offer opportunities for small scale employment provision for example a multi user space for local sports, conference facilities or business exhibitions.

Kase Aero Ltd. considered that local planning authorities the power to manage these issues to ensure development is appropriate within the rural areas of the plan.

Marrons for Whitefields Farm commented that the consultation document recognises that more 'footloose' businesses may seek premises within the rural area including within villages or vacant rural buildings in the countryside and that here are benefits in terms of providing local job opportunities in the rural area.

Summarised comments from other organisations

Nottingham Green Party's view is that there are brownfield sites within the rural areas that could be opened up for diversification and should be developed before any Green Belt land. They also suggested that some flexibility could be applied to the local business rates.

The National Farmers Union made a number of points:

- Rural policy that allows affordable housing;

- Increased social health and wellbeing considerations are needed in rural communities especially where ageing populations are concerned
- Planning needs to help the delivery of broadband and mobile provision in the rural hinterland. Rural businesses expect and need the same quality of service coverage and speed as someone living in an urban area.
- COVID 19 has shown the possibility of more working from home making good connectivity vital; in this context quality office accommodation from re-developed traditional farm buildings can also be provided;
- Covid 19 has also shown us that supporting shorter supply chains is important, with an emphasis on locally produced food and local businesses to keep up the momentum of people looking more locally for their shopping
- The Environment Bill will introduce mandatory 10% biodiversity net gain (BNG) for developers. Envisage that farmers will be able to provide BNG sites and help others offset commodities such as carbon. Planning authorities, economic development departments and LEPS need to recognise this form of rural diversification and help its development.
- Farming is uniquely placed to be part of the solution to climate change, as it is both an emissions source and a sink. Farm processes capture carbon dioxide from the air and turn it into a wide range of foods, fibres, and fuels. Farmers can also protect carbon reserves already present in soils and vegetation.
- Urban and rural planning and farming will increasingly need to change, adapt, and mitigate the issues brought on by climate change. Post Brexit agricultural policy is also set to change, introducing the concept of paying farmers to provide public goods, via the Environmental Land Management Scheme.

Rushcliffe Borough Councillor referred to the comments set out for Barton-in-Fabis Parish Council above.

Rushcliffe Borough Council Leake Ward Members said rural diversification needed a careful approach in order to protect the amenity of local residents and the public rights of way network. The approach should avoid redevelopment of farm sites for unsustainable housing developments and protect the agricultural production capacity of the land noting that local produce was likely to be more in demand. They also commented that there is likely to be greater interest in tourism and day visits to the countryside.

Tollerton Against Backdoor Urbanisation (TABU) said it is important that such diversified businesses do not adversely affect the rurality of small villages and are proportional to the size of those villages.

Summarised comments from local residents

Local residents also referred to the need for rural diversification including for example, more tourism and visitor facilities. Broadband improvements

generally and specifically to assist economic diversification in rural areas was also mentioned. Emphasis should be on small-scale economic development and the reuse of rural buildings including for light industry whilst protecting residential amenity and the countryside and ensuring employment is accessible by public transport. Respondents also suggested financial incentives such as grants to encourage business start-up and lower business rates.

One respondent considered that Green Belt policy is too restrictive. Another responding suggested easing the policy constraints for housing and economic development in the Green Belt, with planning policies and officers being more proactive towards allowing infill of small to medium sized sites, and mixed use, within all the villages.

Some local residents mentioned the need for small-scale interventions to support the rural visitor economy including small-scale conversions of existing buildings, quiet lane network, more walking and cycle routes.

A respondent argued that removing R17 from the plan as this was an area of high quality farmland and help protect the local supply of organic produce.

The Policy may also need a rethink post Brexit. Developers should specify the numbers and quality of jobs as schemes have been approved without any evidence of employment benefits.

Chapter Six: Living in Greater Nottingham

1. Question H1 Affordable Housing

What approach should we take to affordable housing?

Summarised comments from statutory organisations

Amber Valley Borough Council state that the approach taken is unlikely to have any direct impact on them.

Aslockton Parish Council state that affordable housing and its cost must be affordable to a household of below average income and should not be measured against existing purchase/rental prices. **The Group of parishes within the Gotham ward of Rushcliffe Borough, together with the ward member**, state that the placement of an affordable housing development in “the middle of nowhere” will encourage dependence on car transport and a sedentary lifestyle.

Burton Joyce Parish Council state that the powers of local Councils to insist on a high proportion of affordable housing are limited by national legislation, and even further threatened by the recent Government consultations on Planning law (“Changes to the current planning system – consultation on changes to planning policy and regulations,” and “Planning for the Future,” published on 6th August 2020.) Furthermore, they state that direct provision of housing by local authorities, or via direction through an improved planning system, should more consciously redress the balance, which is tilted in favour of high-priced development by straightforward financial advantage. Local planning authorities should be given greater flexibility, not less, in determining the ratio of low cost housing. While the Strategic Plan alone cannot require such an outcome, the point should be expressly made.

Chetwynd: The Toton and Chilwell Neighbourhood Forum state that developers should meet their commitment to the provision of affordable housing in full and not accept section 106 monies instead. In addition, they state that the councils should seek to provide the highest percentage of affordable housing appropriate for the area where development is taking place, encourage movement onto the housing ladder by Affordable to Buy schemes such as Part-Rent-Part-Buy, discourage use of Affordable Homes by families who can afford Market Rent/Prices and provide a strategy and vision for new council housing developments.

East Leake Parish Council state that differential quotas for affordable housing distort the market when developers are looking for sites. They suggest that a blanket target across the whole Greater Nottingham be applied for greenfield sites, with the ability for developers to provide viability evidence to reduce it for particular sites. They also query why the affordable housing target was reduced through the Rushcliffe Core Strategy, when developments that had already been granted planning permission were

achieving the higher rate of affordable housing that previously applied across the whole of the Borough.

Granby Cum Sutton Parish Council state that there is a need to require a high proportion of affordable housing, and to consider methods of ensuring that the housing remains affordable in perpetuity.

The Gotham ward Parishes state that there is definitely a need for affordable housing but this has to be placed in areas where the people who wish to take advantage of it want to live. Part of that is access to jobs/economic opportunities which are in core cities. Affordable housing closer to the city centres and other facilities will encourage diverse transport modalities rather than relying on the car.

Linby Parish Council consider that affordable housing should be integrated within development and should be tenure blind. They also consider that viability is a key factor and clearly in some areas there could be an emphasis on affordable housing. In addition, they consider 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. Finally, they consider that the councils should 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.

Nottinghamshire County Council advises on a number of publications that may give further guidance on the matter.

Ravenshead Parish Council state that Affordable housing should be allowed to take many forms and be flexible enough to accommodate a whole variety of occupants. In addition, affordable housing targets should factor in location, so as to avoid isolation, for example.

Saxondale Parish Meeting state that low cost housing should continue to be required.

Radcliffe on Trent Parish Council state that housebuilders should be required to build their affordable housing quotas.

Ruddington Parish Council wish to see a better design of affordable housing.

Summarised comments from developers

Barwood Land, Barwood Homes, Hallam Land Management and Pegasus planning support a wide range of homes and affordable housing options. **The Woolboro Group** state that the existing approach to affordable housing should be retained as it is consistent with national policy. In addition, Barwood Land state that their land at Middlebeck farm could provide a level of affordable housing, and as part of the plan making process they will actively engage with the Local Planning Authority to ensure an appropriate

level of affordable housing can be provided on site. **William Davis** state that the current approach provides a reasonable starting point, however there should be some flexibility, including discounted market housing for sale. Having a mix set out up-front would assist in masterplanning. **Gladmans** have similar views in relation to supporting the current approach, subject to viability. **Global Mutual on behalf of the Victoria Centre Partnership** consider that the Greater Nottingham and Ashfield Housing Needs Assessment identifies a need for 1,112 affordable homes per annum across the plan area, and that, in line with the affordable housing section of the PPG (paragraph 01), affordable housing policies should be set on the basis of both proven need and viability. They also state that strategic targets should be flexible and location specific.

The Burhill Group and Hammonds Farms state that Greenfield / Green Belt sites tend to be more viable than complex brownfield sites and therefore are more likely to provide the greatest levels of affordable housing to meet the needs of the area. **Mather Jamie** state that levels of affordable housing can continue to vary between authorities but should be clearly determined against local viability assessments and tested through Local Plans, and flexibility needs to be provided to each major proposal to ensure development is able to be developed viably over the life of the schemes, a view also shared by **Parker Strategic Land. The Executors of Evelyn Shepperson** state that the allocation of sustainable urban extensions will enable the delivery of affordable housing in locations close to existing established communities.

The Crown Estate say that the current system works well as it provides flexibility to reflect local circumstances. It is suggested that, in addition to targets for the overall provision of affordable housing, targets are provided in terms of the type of affordable housing to be provided, e.g. intermediate housing, affordable rent and social rent. This would help provide certainty for those bringing sites forward for development. They also state that one way to approach the provision of affordable housing would be to focus development on strategic sites that are relatively unconstrained, to ensure that development can deliver the proportion of affordable housing and affordable housing mix for that area.

Persimmon Homes state that meeting the affordable housing need of Nottingham City and Outlier Boroughs represents an important part of the plan. The policy should however be pragmatic acknowledging that one size fits all approaches to affordable % and tenure are not always viable nor what Housing Associations want. Policy guiding a % unless material factors prove why this isn't achievable constitutes a sensible approach. Tenure and type guidance provided to inform negotiations through planning. A discretionary approach empowering each respective Local Authorities capability to establish their own discretionary affordable housing requirement is sensible. The Core Strategy should not seek to impose a top down affordable housing requirement.

Richborough Estates state that the provision of affordable housing should be informed by robust and up to date evidence of local need, whilst also taking full account of scheme viability and the ability of developments to meet the full range of planning obligations and other requirements sought by the Development Plan, a view echoed by **Taylor Wimpey, Crofts developments, Davidsons developments and Harris Land Management.**

Additionally, **Richborough Estates** state that in the event that full affordable housing needs cannot be met whilst also ensuring developments remain viable, the Strategic Plan should seek to increase the total quantum of housing to be delivered, in order to achieve a proportionate increase in the delivery of affordable housing.

Crofts Developments also state that any policy should only apply to major developments (and 10% of the homes should be for affordable home ownership (unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

Rushcliffe Borough Council as landowner consider that affordable housing policy requirements should take account of First Homes and plan wide viability before setting the percentage requirement. It is also essential that the evidence base is kept up-to-date in line with paragraph 31 of the NPPF which states that policies must be “underpinned by relevant and up-to-date” evidence and “take into account relevant market signals

The Trustees of the Locko 1991 Settlement, Taylor Wimpey, Sztejer, Hodgkinson, Hollins Strategic Land and Samworth Farms consider that affordable housing needs and the viability of new development varies across the Plan area. Furthermore, they consider that caution should be made if setting affordable housing requirements for new developments. Given the complexities and variations across the Plan area, they consider that affordable housing requirements could be delivered through subsequent Part 2 Local Plans.

Trinity College support the principle of affordable housing subject to site specific viability considerations, and that SUEs have the potential to deliver affordable housing over a longer period of time over and above smaller site. In addition, **Hammonds Farms** state that a higher level of deliverable green belt site release is required to meet affordable housing need evidenced in the housing needs study. **Inspired Villages** state that affordable housing requirements should be expressly referenced to C3 residential dwellings only for the avoidance of doubt.

The Wheatcroft Family and Jelson Homes state that affordable housing needs should be met in full having regard to the relevant evidence base.

Wilson Bowden Developments state that affordable Housing policy requirements should take account of First Homes and plan wide viability before setting the percentage requirement.

Summarised comments from other organisations

Beeston and District Civic society consider that any approach is likely to be overridden by later consultation. **The CPRE** state that affordable housing targets should be based on an assessment of need. **The Diocese of Southwell and Nottingham** request that a fixed level of affordable housing in new development to avoid ghettos of wealth and poverty. **The Gedling U3A** state that local authorities should build affordable housing or support housing associations to do so. They also suggest that empty properties should be charged higher council tax.

The Home Builders Federation state that policy approach to affordable housing should be consistent with the 2019 NPPF's promotion of affordable home ownership by requiring at least 10% of new dwellings built to be available for this tenure leaving only the remainder for other affordable housing tenures. They also state that viability testing should assess the cumulative impact of affordable housing provision, policy compliant standards, infrastructure and other contributions so that there is sufficient incentive for a reasonable landowner to bring forward their land for development.

Finally, they state that the full economic consequences of the Covid-19 pandemic are as yet unknown and such uncertainty means that a larger viability buffer is necessary. Similar views are also expressed by Davidsons developments.

The Nottingham Green Party state that affordable, secure and comfortable accommodation is a basic human right. Furthermore, they state that the provision of affordable housing should include the construction of new homes, conversion of existing buildings to homes and the refurbishment of empty buildings, and have adequate levels of energy and water efficiency. Finally, they are urging the councils to make more use of empty dwelling management orders. **The Nottingham Open Space Forum** state that affordable housing levels need to be increased in order to address council house waiting lists.

A Ward Member for Ruddington requests that at least 40% of the new houses need to be genuinely affordable or be built as social housing. In addition, the ward member states that Rushcliffe borough could lead on building sustainable social housing for the future. Moreover, they consider that affordable housing should be designed with adequate garden space and enough parking, and that affordable housing should not be placed at the back of developments. **A Ward member for part of West Bridgford** states that we need smaller homes to be built and we also need to provide for downsizing homes.

Summarised comments from local residents

One comment states that developers should provide for good quality affordable housing. One comment suggests that affordable housing is best provided through the development of one estate close to the city. Other comments suggest that affordable housing should be developed within areas that are accessible to jobs and amenities. One comment suggests that affordable housing is best provided within areas of deprivation. Others suggests affordable housing should be located in within and around the city.

A number of comments suggest that developers should not be able to negotiate out of providing affordable housing. One comment suggests that developers suppress build rates which leads to a lower level of affordable housing being delivered. One comment suggests that an increase in stock of affordable housing could be achieved if the councils were allowed to compulsory purchase long term empty properties at a discounted rate. There was some support for the provision of social rented housing.

Another view is that council owned properties for rent should not be sold at discounted prices unless they are replaced. This would ensure that the rental stock is not depleted. In addition, one comment states that those that are sold at discounted prices, if sold on in the future, should be sold at a discounted price. Another comment suggests that household rents should be set according to household income.

In relation to the setting of targets, one comment states that it should be between 10 and 30% across the area. Another comment states that the target should be 20% and not negotiable. One comment suggests that there should be a fixed percentage of social rented housing. Another comment suggests that there should be a higher percentage of affordable housing in areas where there is a need and where it is affordable to live. Others have stated that the policy should specify in more detail what types of affordable housing should be provided. One comment goes further and states that the needs of each area should be assessed so that the appropriate mix of affordable housing should be required.

In relation to affordable housing in villages, some comments supported the provision of affordable housing where there is an identified need, so long as the properties remain affordable in perpetuity. Another comment suggests that villages are unaffordable and that a higher percentage of affordable housing should be sought.

Turning to other matters, a number of comments support the provision of purpose built student accommodation near to universities in order to free up existing housing stock for families. One comment suggests that office blocks could be converted to student accommodation.

2. Question H2 Housing Size, Types and Tenure

What should our role be in influencing the mix of housing size, types and tenure in new development schemes?

Summarised comments from statutory organisations

Amber Valley Borough Council consider that any role is unlikely to have a direct impact on them.

Burton Joyce Parish Council refer back to their answer provided to question H1. **The Group of parishes within the Gotham ward of Rushcliffe Borough**, together with the ward member, state that different settings require a different type of housing and any diversity should be driven by need and not for the sake of it.

Chetwynd: The Toton and Chilwell Neighbourhood Forum consider that two/three bedroom properties are needed for first/last time buyers/renters in terms of affordability as opposed to four to six bedroom ones. They also wish to discourage “housing size creep” where properties are extended adding new bedrooms if the mix of properties in the area does not warrant it.

East Leake Parish Council state that there should be a target mix set for market housing based upon housing projections and market forces. In addition, given the impact on the economy Covid 19 may have, there may be a shift in needs from home ownership to rental. Finally, they consider that a policy on net density for different types of sites needs to be agreed between the authorities and it should apply across the whole housing area.

Granby Cum Sutton Parish Council suggest that local authorities should have a role in ensuring an appropriate mix of homes for all ages and needs are planned for.

Saxondale Parish Meeting suggest the provision of housing to encourage ownership. They also suggest that office space is re-purposed for low cost use in urban areas. They also suggest the provision of apartments and bungalow availability for those who wish to downsize.

Homes England consider that it will be useful for a policy to identify the broad housing mixes that the authorities would expect to see delivered, linked to the outcomes of relevant evidence base. They also consider that that a policy governing housing mix should include sufficient flexibility, and recognise that there may be circumstances where different proportions of size, type and tenure might be suitable.

Linby Parish Council consider that any housing mix should not supersede housing mix policies contained within Neighbourhood Plans.

Nottinghamshire County Council have identified a number of publications that may give further guidance on the matter.

Radcliffe on Trent Parish Council states that the plan should encourage mixed housing in a development with smaller affordable houses ‘pepper-potted’ about the site. Include smaller properties, such as apartments, for ‘downsizing’ seniors, thereby releasing larger properties for family use. They

also consider that office blocks which may no longer be required in Nottingham City could be repurposed into student accommodation and affordable housing for younger people to rent or buy.

Ravenshead Parish Council state that affordable housing should take place in a variety of forms and be flexible enough to accommodate a wide variety of occupants. In addition, they state that guidelines to room size should be given greater weight.

Ruddington Parish Council state that the plan should ensure that the housing type for new developments is mixed and in keeping with the local area. They also consider that affordable/ Social Housing should be interspersed through a development rather than grouped together at the back. Furthermore, they consider that affordable/ Social Housing should include garden and office space. In addition, they consider that driveways and adequate parking for the housing sizes should be mandatory. Finally, they consider that new developments should have walkways between streets to green areas and to access local shops easily

Tollerton Parish Council believe that the mix of housing and all the local detail being consulted on should be left to determination by each democratically elected local authority.

Summarised comments from developers

Barwood Land and Barwood Homes support a wide mix of housing size types and tenures. In respect to their particular site at Middlebeck Farm, they are committed to providing a mix of dwellings on the site which not only meet the identified need within the area, but also reflects market demand.

Trinity College offer similar support subject to viability considerations.

The Home Builders Federation and a number of developers suggest that any policy should consist of broad principles, be flexible and not overtly prescriptive.

Hallam Land management and Pegasus Planning state that it would be appropriate for the plan to contain guidance on housing mix, but cautions that an absolute mix would be restrictive and would fail to allow proposals to reflect local need at that time, or have regard to viability issues e.g. high rise apartments in the city. They suggest that any approach has an element of flexibility to respond to changes over time and site characteristics.

Mather Jamie raise similar issues; however, they state that any approach may require flexibility on phased developments.

Taylor Wimpey state that there is a need to be consideration for the market demand for housing and not just affordable needs. In addition, they state that there should not be a prescriptive mix as the evidence will be based upon a fixed point in time, a similar view that of the **Executors of Evelyn Shepperson**.

Parker Strategic Land state that SUEs can provide for the opportunity for a wide mix of housing which can be agreed through site masterplans.

Gladman consider that a prescriptive housing mix requirement should be avoided with the policy approach providing sufficient flexibility to ensure that new developments are responsive to housing needs evidence across the whole period. In addition, Gladman highlight that any policy requirement for Self-Build and Custom-Build plots must be justified with robust evidence on demand and need for this type of housing. Furthermore, they state that it may not be appropriate to apply a blanket requirement for the provision of self-build plots on major development sites as this does not respond to the differing needs across the region.

Global Mutual on behalf of the Victoria Centre Partnership state that smaller homes are important to diversify the market and provide a local housing need for downsizers or for first time buyers. It should be acknowledged that a lower level of provision of family units will be acceptable in highly sustainable locations, such as Nottingham City Centre. Furthermore, they state that the Councils should recognise the role of Build to Rent development and develop planning policies which help to support it.

Fisher German on behalf of Hodgkinson states that as per affordable housing, housing needs vary across the Plan area. As such the Council should avoid prescribing a strict housing mix, based on a fixed point in time. Flexibility must be ensured to ensure that any eventual housing mix has regard for both updated local need evidence, but also market forces and viability. Again, overtly stringent housing mix requirements can delay and prevent development. Similar views are echoed by **Fisher German on behalf of Sztejer**.

Hollins Strategic Land consider that the need for specific housing types, size and tenure can vary throughout a plan period. They consider that a high level approach would be best within the plan, or possibly a requirement for a more detailed approach through bespoke assessments in support of planning applications or through neighbourhood plans.

The Defence Infrastructure Organisation consider that it will be useful for a policy to identify the broad housing mixes that the authorities would expect to see delivered. This should be linked to the outcomes of relevant evidence base (and we note that a Greater Nottingham and Ashfield Housing Needs Assessment report has been prepared). However, they consider that a policy governing housing mix should include sufficient flexibility, and recognise that there may be circumstances where different proportions of size, type and tenure might be suitable.

Mather Jamie, Crofts Developments, Davidsons Developments and Harris Land Management state that the size, type and tenure of housing expected, including that to meet the needs of different groups, can materially affect the planning contributions that are capable of being delivered on a specific site. They consider that any guidance on size, type and tenure can

provide helpful direction to understand a given area and how development might be delivered but it should remain guidance rather than policy.

Persimmon Homes and Wilson Bowden developments express similar views.

Parker Strategic Land consider that the strategic growth locations should provide a range and mix of housing to meet the needs that arise through the Housing Market Assessment (HMA) and be fine-tuned to meet the specific needs of the locations, subject to their individual viability. On larger sites this can also be a requirement, but the suitability for a range of housing needs to be tested against local needs and the viability of individual sites.

The larger sustainable urban extensions should provide for a range of types and tenures and offer opportunities for a self-build and community housing schemes where a need is identified. Targets can be set for particularly authorities and sites depending on viability.

Positive Homes consider that in wealthy places like Rushcliffe, the biggest problem is just getting on the housing ladder in the first place. So priority should be given to schemes catering mainly to smaller homes in these places.

Richborough Estates view differs in that they would not wish to see a strict housing mix, as this inhibits the ability of developers to respond to changing market demands. They also state that if there is evidence of need for housing to meet the requirements of specific groups, this would be best met through the allocation of appropriate sites; for example, to provide housing for the elderly, for students or self-build plots. This view is supported by **Oxalis Planning**, together with the allocation of a greater number of smaller sites. **Hammonds Farm and Langridge Homes** would ideally like housing size to be determined by the market. They also say that there is a growing demand for an additional room that can be used as a study and provide flexible accommodation.

Rushcliffe Borough Council as landowner do not consider that it would be appropriate for the Strategic Plan to implement a blanket requirement for housing size, types and tenures. A blanket approach will lead to inflexibility. Furthermore, they consider that housing mix should be led by the status of the housing market at the time of application. It may be appropriate for the Council to produce a Supplementary Planning Document (SPD) which sets out a desired mix for the affordable housing element of proposals. This could include details associated with the tenure mix and unit size for each requirement.

Samworth Farms state that housing needs vary across the Plan area. As such the Council should avoid prescribing a strict housing mix, based on a fixed point in time. Furthermore, they state that due to the variations across the Plan area, this is something that could be considered at a District level.

The Woolbro Group would not wish to see a one size fits all approach across the housing market area given the wide differences across it. **Jelson**

and the Wheatcrofts generally echo similar views to **Richborough Estates**, and raise that site specific characteristics should also be a factor.

The Trustees of the Locko 1991 Settlement also have similar views to the above in respect of market housing, and also consider that viability may also be a factor when deciding upon a particular housing mix in a particular development. **IM Land** consider that the emerging plan should not include a prescriptive policy on housing mix, size, types or tenure as needs will change over the plan period. Such a policy would potentially undermine viability and delivery of sites. They consider that any such policy should be dealt with as a supplementary planning document which can be regularly updated and, in addition, they state that there should be no 'blanket' policy as standards should reflect the needs of specific settlements and areas.

Summarised comments from other organisations

The Beeston and District Civic Society state that new development should be matched by the needs of the community rather than the priorities of the developer.

The Nottingham Green Party state that much new housing is of a poor quality, for example with inadequate space and light, or poor energy performance. **A Ward member for Ruddington** states that house types that do not sell well in a particular area should be discouraged.

Summarised comments from local residents

In terms of housing mix, types and tenure a number of comments state that it is essential that new developments are in keeping with their surroundings. In addition, some comments state that affordable housing should be designed so that it is tenure blind, of good design and integrated into development as a whole. Some responses indicate that in order to encourage people to downsize from under-occupied property, bungalows and adaptable homes should be provided. There was also support for the provision of many smaller properties of good quality design. Some comments go further in stating that each development area within the plan should have its own tailored housing mix. One comment suggests that housing mix should be determined or informed by neighbourhood plans. Another comment suggests that the planning process has become too centralised favouring developers, and that there should be more local say into the types of houses that sites should provide.

One comment supports the provision of build to rent rather than buy to let, as this gives more security of tenure for the renter. A further comment states that the subdivision of larger sites to allow for smaller developers may improve housing mix.

One comment supports the intensification of the main built up area of Nottingham and its suburbs, conversely one comment does not support increasing the density of development. There was some support for the

provision of rooms capable of being used as an office within new dwellings. Conversely, some comments state that there is a shortage of smaller starter homes for the market.

3. **Question H3: Meeting the Needs of Different Groups**

How should we address the needs of people with particular housing needs for example, the elderly, disabled and students?

Summarised comments from statutory organisations

Amber Valley Borough Council consider that any approach is unlikely to have a direct impact on them.

Burton Joyce Parish Council refer back to their answer provided to question H1, and advocate the building of smaller homes in suitable areas.

Chetwynd: The Toton and Chilwell Neighbourhood Forum state that new housing should be accessible and adaptable/adapted. They also consider that purpose built retirement living may be appropriate for some, but not all older people want to be segregated from younger members of the community.

Nottinghamshire County Council refer to a number of publications on the subject matter.

A number of Parish Councils across the plan area, and the Ward member for Gotham state that University accommodation needs to be close to where they serve, and that all types of specialist accommodation should have good access to jobs, services and facilities. **Aslockton Parish Council** state that making new housing accessible will encourage intergenerational living.

East Leake Parish Council consider that houses should be constructed to a lifetime homes standard, with wider doors etc. to facilitate use by more of the population

Linby Parish Council consider that managing the needs of different groups is supported through the policies in the Linby Neighbourhood Plan and would not like the policy superseded by the strategic plan.

Ruddington Parish Council wish to see more bungalows, which will also help those with physical disabilities and not just the older generation. More generally, they wish to see the overall design of new development catering for the needs of all.

Finally, they consider that developers see building student accommodation as a cash cow at the expense of the needs of the local community. New developments for student living should be subject to an impact assessment on local housing needs on a case-by-case basis. Where such a development

is approved, the universities & colleges should be required to provide the equivalent of section 106 monies to fund affordable housing for the local community.

Summarised comments from developers

Crofts Developments, Davidsons Developments, Mather Jamie and Harris Land Management state that the size, type and tenure of housing expected, including that to meet the needs of different groups, can materially affect the planning contributions that are capable of being delivered on a specific site. Any guidance on size, type and tenure can provide helpful direction to understand a given area and how development might be delivered but it should remain guidance rather than policy.

Gladman state that should the council wish to adopt optional standards for accessible and adaptable dwellings this must be justified through clear and robust evidence and be analysed through viability testing in relation to any specific requirements the Plan wishes to impose.

Global Mutual, on behalf of the Victoria Centre Partnership consider that the promotion of new sites for Student accommodation is therefore vitally important in managing the growth in student numbers and helping to reduce student concentrations in traditional housing areas. They also consider that locations for new schemes should be focused within Nottingham City Centre, as well as within shopping and commercial frontages, and other areas along main transport routes.

Hammond Farms and Langridge Homes consider that with the proportion of the over 65s rising there is a growing need to provide continuing care communities. Sites are not readily available in built up areas therefore would be most appropriately located within urban extensions. Mather Jamie offer similar views in relation to sustainable urban extensions being able to accommodate specialist housing as part of the mix.

Hollins Strategic Land recognise that older persons housing is a pressing need of our time. They consider that the provision of older persons housing in rural areas would provide for a release of larger properties for families.

The Home Builders Federation state that if the Councils wish to adopt optional standards for accessible & adaptable dwellings, or for national space standards, then this should be based upon evidence as required by national policy, and be tested for viability. In respect of housing for older persons, they state that some will not move from their current home but will make adaptations as required to meet their needs, some will choose to move to another dwelling in the existing stock rather than a new build property and some will want to live in specialist older person housing.

Taylor Wimpey consider that evidence is required on the need for specialist housing which is a bespoke piece of work required to inform options for the next consultation.

Inspired Villages state that it is critical that the plan addresses the housing needs for older people. They state that this can be achieved through adopting the eight recommendations to Local Planning Authorities outlined within the publication 'Representation by Inspired Villages for a Local Plan that will support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population'.

Oxalis Planning and Richborough Estates consider that if there is a need for particular types of accommodation, then this is best met through the specific allocation of sites for these types of housing for example retirement homes and self and custom built homes. Oxalis planning also consider that the allocation for a greater number of smaller sites could help.

Parker Strategic Land state that there is a need to provide for all types of specialist accommodation, and that larger strategic sites could provide for a range of needs and requirements which reflect the needs of the HMA and the local area.

Persimmon Homes consider that demand for student accommodation is typically focused around city university campus sites. The student body around Nottingham is well served with purpose built apartment lets and HMO however where a University identifies a shortage of available accommodation they as principal landowners have the land and means to address any identified shortfall. Elderly and disabled housing needs are in part catered for by Build Regulations Part M4. Sheltered accommodation with ward assisted living is however a specialised sector that few family house builders will have experience working with. Where a shortfall in ward assisted or sheltered accommodation exists the council should look to incentivise the delivery of such schemes. Where demand for specialised housing need exists a relevant planning policy for specialised living could be considered however adaptation of existing housing stock will have a large part to play in addressing evidenced specialised housing needs.

The University of Nottingham consider that the needs of students can be met largely through purpose built student accommodation, managed by the Universities, and should therefore be encouraged in local planning policy and financially incentivised in appropriate locations that place students at the focus of their educational and social life; in the city centre and areas proximate or accessible to the University Campus'. This delivery must not be restricted and will in in turn maintain family accommodation elsewhere and protect the amenity of local communities by focussing contrasting student lifestyles, where they want to be, away from more suburban residential locations.

William Davis state that the Local Plan should include policies to support the delivery of housing for groups with particular needs subject to certain criteria. In addition, they state that for the larger sites and SUEs, the inclusion of an element suitable for the different groups could be encouraged but should not be required. As with the **Home Builders Federation**, they consider that a requirement for a certain percentage of properties should be

built to higher accessible and adaptable standards should be fully evidence and viability tested.

Summarised comments from other organisations

The Nottingham Green Party wish to see all housing as wheelchair adaptable. **The Diocese of Southwell** and Nottingham consider that given the experiences of the pandemic, developments should be such that it encourages a sense of community.

Summarised comments from local residents

In relation to housing for specific groups, one comment states that these groups should be consulted in order to ascertain their needs. One comment suggests that the local plan should set out the types of housing required on sites that suits the needs of the local community. Other comments state that homes should be adaptable. Some comments suggest that bungalows and sheltered accommodation will be needed to meet the needs of the elderly. Some comments go further and state that a percentage should be prescribed. One comment states that ghettos for the elderly and other groups should be avoided. Another comment supports the identification of a retirement village. Some comments state that it is not just the types of housing provided which needs addressing, and that the design and layout of new development should be in a form that is accessible to wheelchair users, including access to gardens. Another comment states that a successful community should consist of a range of properties, and contain green spaces, social facilities and small shops. One comment states that each site should have a prescribed housing mix.

One comment encourages the conversion of offices to homes, and that this could meet the needs of the student population, and encourage a vibrant city economy. Another comment suggest that the needs of students should be met by the educational establishments. Some comments support the provision of student accommodation close to educational establishments.

One comment suggests that there is scope to mediate between landlords involved in buy to let and developers in order to provide for accommodation suitable in this sector.

4. **Question H4: Gypsies and Travellers**

What approach should we take to accommodating the housing and travel needs of Gypsies, Travellers and Travelling Showpeople?

Summarised comments from statutory organisations

Amber Valley Borough Council state that any approach is unlikely to have a direct impact on them.

Aslockton Parish Council state that sites should be widely distributed and restricted to 10 units.

Burton Joyce Parish Council consider that there needs to be provision of entirely self-sufficient well managed sites, close to transport routes.

Chetwynd: The Toton and Chilwell Neighbourhood Forum consider that there should be provision of suitable dedicated affordable sites (possibly subsidised), with appropriate facilities, for these (often temporary) members of the community to use, in order to discourage occupation of other land that is not suitable to live on however temporary it might be. The sites could provide built accommodation for regular returners as well as large enough pitches for travelling caravans. The cost of providing such sites should be offset against the clear-up costs when 'illegal' sites are vacated.

The Group of parishes within the Gotham ward of Rushcliffe Borough, together with the ward member, state that as there are no sites in Gedling and Broxtowe, they could be located close to local amenities there. They cite that the 2016 Gypsy and Traveller Accommodation Assessment reports that the representatives of the community have no preferences to where sites are located across south Nottinghamshire, and that sites already exist in the city and Rushcliffe.

Linby Parish Council state that 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.

Radcliffe on Trent Parish Council state that there should be provision of a designated site so there is less likely to be illegal parking of vans. Ravenshead Parish Council have no comment on the matter. **Saxondale Parish Meeting** wish to see such provision close to urban areas.

Summarised comments from developers

Crofts Developments, Davidsons Developments, Harris Land Management and Mather Jamie consider that requirements to accommodate the housing and travel needs of Gypsies, Travellers and Travelling Showpeople should be identified by robust and up to date evidence. The location of any sites should be carefully identified having regard to travel patterns and routes rather than simply being required as part of strategic allocations.

Parker Strategic Land state that provision should be made where the requirement is identified and sites are available/suitable. Taylor Wimpey await the outcome of the assessment.

A Ward member for part of West Bridgford suggests that we should work with the community to find a solution that suits everyone.

Summarised comments from other organisations

Nottingham Credit Union state that appropriate sites should be provided in order to accommodate Gypsies, Travellers and Travelling Showpeople.

Summarised comments from local residents

One comment states that adequate provision should be made, but needs to be close to facilities and services. One comment states that an assessment should be made for the requirement for permanent and transit sites. Some comments support provision in rural areas, with the provision of serviced sites. Some comments consider that there is no need for additional provision. Other comments prefer smaller sites rather than one large site. One comment supports provision on a larger housing site in order to enable integration. Other comments mirror those of the parish councils in the Gotham ward supporting provision within Gedling and Broxtowe. Another comment suggests provision of a transit site is appropriate in order to prevent unauthorised encampments. One comment suggests that the need is reducing and that sites are being granted planning permission for a traveller pitch and then being sold on for housing. One comment states that provision should be demand led.

One comment suggests that the site next to Hathernware (in Rushcliffe) could be bought by the Council and brought into use, and that other similar brownfield sites should be investigated. Another comment suggests the provision of housing for travellers would allow for better integration.

Chapter Seven: The City and Town Centres

1. Question CTC1: The Network and Hierarchy of Centres

Do you think the network and hierarchy of centres set out within Figure 7.1 remains appropriate?

Summarised comments from statutory organisations

Amber Valley Borough Council commented that the role of Giltbrook Retail Park and similar locations in the retail network and hierarchy should be addressed in the Plan.

The Parish Councils of **Gotham, Barton in Fabis, Kingston on Soar, Ratcliffe on Soar Parish Meeting, and Thrumpton** and the Parish Councils of **Aslockton, Granby cum Sutton, Ravenshead and Ruddington** considered the proposed hierarchy appropriate.

Burton Joyce Parish Council commented that the priorities as set out in paragraph 7.7 are significant and realistic on the large and medium scale, but the importance of convenient shopping in small communities is understated.

Chetwynd: The Toton and Chilwell Neighbourhood Forum commented that broadly yes. However, development within Chetwynd Barracks and at the Hub Station will see local centres in these areas as identified in the Chetwynd: Toton & Chilwell Neighbourhood Plan.

Historic England stated that the network and hierarchy set out is noted but if Erewash is to be considered in relation Plan then the situation of Erewash centres should be clarified.

Linby Parish Council commented that the hierarchy of centres acknowledges Hucknall which adjoins Linby Parish. Linby Parish Council supports a joined-up approach with neighbouring authorities when considering how to create sustainable communities and places.

Radcliffe on Trent Parish Council stated that Radcliffe on Trent is referred to as a 'local centre' in the plan, this is appropriate as we serve the residents of Radcliffe and Shelford in the main.

Rempstone Parish Council stated that the current hierarchy is outdated due to increased development of areas such as East Leake, Ruddington and Radcliffe on Trent.

Summarised comments from developers

Crown Estate comment that the retention of Bingham as a District Centre is supported and confirmed by the Growth Options Study

Hammond Farms considered that recent trends in lifestyle changes, technological changes and Covid-19 meant that centres, including retail parks are under threat and are likely to require major remodelling and refocussing. The impacts will be felt on commuting patterns and therefore transport and transport infrastructure requirements and wider land use planning including re-use and regeneration strategies for centres across the Greater Nottingham will need to be reviewed.

Andrew Granger on behalf of the Hill Family commented that the hierarchy set out within the Figure 7.1 is inconsistent with the Settlement Hierarchy contained within the adopted Rushcliffe Local Plan Part 1: Core Strategy, insofar as this document identifies Ruddington as being a Key Settlement, which is the same position in the hierarchy as Bingham.

Andrew Hiorns on behalf of Parker Strategic Land agree that the current list is appropriate

Positive Homes commented that East Leake should be designated a district centre - as a strategic place halfway between Loughborough and Nottingham this makes sense (just as Bingham performs that role for Nottingham/ Grantham/ Newark).

Taylor-Wimpey suggest consideration of Gamston as a District Centre given its range of amenities and the sizeable catchment area it serves.

Summarised comments from other organisations

Burton Joyce Climate Action group and **Nottinghamshire CPRE** supported the hierarchy.

RBC East Leake ward members stated that greater emphasis should be placed on developing and supporting effective local and neighbourhood centres. Post Covid-19 these are likely to become increasingly important. Policies at Core Strategy level are needed to ensure that effective local centres are created in new strategic allocations.

The Nottingham Green Party is in general agreement with the network and hierarchy, but state that with the move to more working from home and more on-line shopping, there is likely to be an increase in demand for more local shops and a decrease in demand for city centre shops.

Nottingham Credit Union stated that while there will be a return to work in the City, the trend towards more working from home has been given additional impetus by Covid-19. This means more need for resources closer to where people live.

WSP UK Ltd (Agents working on behalf of Global Mutual / The Victoria Centre Partnership) commented that the identified hierarchy reflects the employment, shopping, service and leisure provision within the Region and is appropriate basis for accommodating growth over the plan period. The

hierarchy will be important in determining the scale and nature of main town centre uses suitable in each centre. Development should be concentrated within the designated boundaries of city, town, district and local centres. Given the over-lapping nature of shopping catchment areas it is important development is of an appropriate scale to the role and function of each centre, and that development does not have an adverse impact on any other centre. The continued application of the sequential approach and impact test to site selection will be critical and the plan must provide a clear indication of where main town centre uses will be focused. It is right that NCC remains at the top of the hierarchy and is the focus of growth and development.

Summarised comments from local residents

The majority of residents thought that the hierarchy was appropriate.

One resident generally agreed with the hierarchy but considered that other forms of shopping and employment etc. are increasing and therefore more localised provision should be made.

Two residents commented that some district centres are now town centres but did not specify which ones.

One resident stated that current proposals would Bingham double in size, and the character of this distinctive market town would be overwhelmed.

A resident stated that Bulwell 'town centre' is gradually losing importance, whereas Sherwood is gradually gaining it. It would be useful to note where large super- and hyper-markets are located. It could be argued there are so many around the fringes of Bulwell now that the 'town centre' itself is becoming hollowed-out.

One resident stated that Ruddington would have to move up the hierarchy if the housing developments continued.

A resident considered the 2nd tier centres to be Netherfield, Arnold, Hucknall, Bulwell, Hyson Green, Beeston and West Bridgford. 3rd tier centres where people can go for alternative mainstream or culture are; Giltbrook, Ilkeston, Stapleford, Long Eaton, Clifton, Sneinton, Cotgrave, Bingham, Carlton and Sherwood.

One resident stated that Radcliffe-on-Trent is a thriving growing place and should be a District Centre.

A resident commented that West Bridgford should be defined as Town Centres and Carlton/ Netherfield, East Leake and Cotgrave as District Centres.

One resident considered new centres will be needed e.g. Ratcliffe on Soar/East Leake.

One resident considered that Local Centres are, in the main, in villages and that the Plan should endeavour to protect villages and avoid over developing/extending them.

A resident stated that there should be more attractions, events (e.g. markets, fairs, plays, but not evening outdoor concerts), more green spaces, more individual shops. There has to be a reason to visit and spend money e.g. M&S is a huge draw in West Bridgford for residents and outlying areas.

One resident commented that post Covid-19 people are tending to use quieter/greener places to spend time and that maybe the larger centres could adapt to provide some.

A resident commented that the mix of services provided at each level is no longer appropriate. For example, the provision of "shared offices" at local centres would build on the experience of working from home in Covid-19. In addition, the Local Centres could be used as "collection points" for internet shopping deliveries. New developments should provide Local Centres within a short walk of all households.

A resident stated that this exercise serves to illustrate that Nottingham needs to expand to fit its natural boundaries

2. **Question CTC2: Nottingham City Centre and the Town and District Centres**

How can we help our City, Town and District Centres to adapt to changing shopping habits and other behavioural changes?

Summarised comments from statutory organisations

Amber Valley Borough Council stated that the role of Giltbrook Retail Park and other similar locations in the retail network and hierarchy should be addressed in the Plan.

The Parish Councils of **Gotham, Barton in Fabis, Kingston on Soar, Ratcliffe on Soar Parish Meeting, and Thrumpton** all commented that the Plan should focus on addressing the decline of the City Centre, having regard to the seismic changes faced following Covid-19, exacerbated by the cancellation of the Broadmarsh redevelopment. There is a capacity for improvement and untapped potential. Metro Dynamics' 'Developing a City Centre Strategy for Nottingham' includes a number of suggestions that were highlighted. The best approach is to heavily concentrate redevelopment within the city centre. A delivery partnership should be created to deliver ambitious growth targets in the City Centre. This would allow the smaller centres to concentrate on providing sustainable services to its local people and have a 'levelling up' effect driven by increased attractiveness of the City. Assistance for town and district centres would be best delivered at a local level, tailored to the individual needs of those centres.

Burton Joyce Parish Council commented that it has in great measure undergone this process within living memory, and the commercial heart of

the village survives. Such an area requires urgent investment to create a centre more in keeping with societal and economic developments. Changes required include renewal of old infrastructure, development of “shared space,” (pedestrian/vehicle), improvement to the people environment to make it more attractive to people to stay, to improve its facilities and functionality. The Parish Council has run a two-year project to understand these issues and has developed a plan, which now requires implementation through appropriate funding. The replacement of some specialist shops by homes, public services or hospitality businesses can keep remaining shopping places profitable.

Granby-cum-Sutton Parish Council stated that planners should develop green spaces in the city centre and affordable units to encourage independent traders and artisans, to make centres more unique.

Historic England stated that the plan could consider ways of providing for the reuse and appropriate adaptation of any heritage assets to assist with changes in shopping habits drawing on the experience of Nottingham High Street Heritage Action Zone projects. In addition, Historic England’s Heritage Counts information on Heritage in Commercial Use (2018) and Heritage and the Economy (2019).

Linby Parish Council commented that we can support city, town and district centres by:

- Ensuring ground floor units remain in accessible town centre uses;
- Re-use of centre uses;
- Ensuring there are a good choice of modes of transport into the city and town centres; and
- Recognising the importance of cultural uses and events in making town and city centre uses viable.

Radcliffe-on-Trent Parish Council commented that there will possibly be less impact on our local shops from on-line shopping than that experienced by large shopping areas such as Nottingham City. Encouraging local people into shops and cafes could be enhanced with the introduction of a pavement culture, improved public transport in the evening to some parts of the village would be needed and street clutter could be an issue.

Ravenshead Parish Council considered that City Centre’s, as shopping magnets, are likely to contract and that High Streets will shrink, thus freeing up former retail spaces. Many of these units will need to be re-assigned to residential occupancy and planning decisions will need to reflect this.

Ruddington Parish Council commented that more widespread grants to help regenerate store fronts, more investments to help set up monthly markets or help develop existing ones. More benches or architecture designed to sit on, more planters and investments in hanging baskets in the summer.

Saxondale Parish stated that it should be re-determined which of Radcliffe-on-Trent and Bingham is the local hub. Very little can be done other than to encourage new markets, new investors or start up retailers. Local authorities are not geared up to do this and any effective solution would need to come

from central government. Alfresco dining, local quality products and more flexible opening hours should be encouraged.

The Theatres Trust stated that it is important to facilitate community and cultural facilities within town centres as these help drive footfall and maintain the centres.

Summarised comments from developers

Andrew Hiorns on behalf of Parker Strategic Land commented that the viability of town centre relies on their ability to adapt, which is essentially the ability to change to meet changing consumer demands. This is the basis of the Government's changes to the use classes to provide flexibility under the new E class.

Taylor-Wimpey stated that flexibility of uses within the City/Town/District Centres will help as will investment in the public realm in such locations including access measures.

WSP UK Ltd (Agents working on behalf of Global Mutual / The Victoria Centre Partnership) commented that planning policies should provide flexibility to allow City, Town and District Centres to adapt to changing shopping habits and other behavioural changes. National policy recognises that there are rapid changes affecting the retail and leisure industries and greater flexibilities are also now reflected in recent changes to the Use Class Order (UCO) brought into effect in September 2020 with the new Use Class E (Commercial, Business and Service). Such controls risk curtailing and undermining these national changes. Policy in the emerging plan must allow this flexibility and to reflect the significant challenges town centre now face and in the longer term. In Nottingham City Centre, and at the Victoria Centre, a wider mix of town centre uses is already part of the character of the centre; and is playing an important role drawing visitors from across the region – and this should be allowed to continue.

Summarised comments from other organisations

Beeston & District Civic Society stated that we can best help by careful application of permitted development so that quality is not compromised.

Chetwynd: The Toton and Chilwell Neighbourhood Forum commented that provide a range of high quality cultural, social & leisure facilities within or close by the centres to increase footfall. Discourage any further 'out of town' shopping centre development and instead encourage outlets to occupy the centres, and also increase footfall. Shopping outlets would need to have a unique 'offer' not available online to compete with this increasing mode of purchase. Bespoke items and/or an exceptional personal customer service perhaps?

The Diocese of Southwell & Nottingham commented that some places have placed great emphasis on people meeting and shopping locally, so that the experience enhances wellbeing, and this needs to be reinstated. Can we

encourage independent retailers and places where people don't simply buy goods but participate? How can we encourage a sense of being able to contribute rather than being on the receiving end of what others choose to offer?

RBC East Leake Ward members considered the terminology "Town Centre" is unhelpful as large villages also have "town centres". If the result of post Covid-19 life is a shift of footfall from larger to smaller centres, then the former need to contract to retain a coherent and concentrated centre rather than getting strung out/diluted with residential, and the latter need room to grow.

An RBC ward member commented that more leisure in city- and more small shops.

Nottingham Credit Union stated that the offer in the City and town centres will need to adapt, and this change should be encouraged as it brings many advantages - not least for the environment. However, there will be a need to improve the financial capability of some of our fellow citizens, especially those who are vulnerable.

The Nottingham Green Party stated that public transport should be increased. Flexibility on rates/rents would help, and the availability of smaller retail sites to attract genuinely independent shops would diversify the shops of the high street, attracting greater footfall. At present, if most city centre shops are chains, which are also represented in out-of-town shopping centres, there is little incentive for people to travel to the city centre to shop.

Nottingham Local Access Forum (NLAF) and Pedals both commented that walking and cycling within and to these centres should be made safe and attractive. There is a need to provide adequate/ appropriate cycle parking. With less demand for shop space there is an opportunity to provide more green and open spaces to provide a more attractive environment. The redevelopment of the Broadmarsh Centre, on a major pedestrian route from the station, presents such an opportunity. Where appropriate, more housing should be provided.

Nottingham Open Spaces Forum stated that the '15-minute city approach' should be used.

Nottinghamshire CPRE stated that by providing attractive affordable accommodation and green spaces in town centres, the centres continue to have a purpose and life.

Nottinghamshire Ramblers commented that we should regenerate the City, Town and District Centres and create/enhance GBI routes to and from them to turn them into hubs for exercising and socialising. Make walking and cycling within, to and from these centres safe and attractive. Provide adequate and appropriate short and longer-term secure cycle parking, including undercover provision. The canal side development in Nottingham is a good example of what can be achieved in making vibrant spaces.

Rushcliffe Green Party commented that Covid-19 has increased the trend towards online shopping. Nottingham City Centre has too much retail space and a more mixed use of the city centre should be sought, with more high density housing, entertainment and flexible use high quality office space, and importantly the establishment of more green spaces and urban parks. The Broadmarsh site provides an opportunity to pursue this vision.

‘Tollerton Against Backdoor Urbanisation’ stated that new housing and employment should be located in areas with good transport connections to the city and town centres.

Summarised comments from local residents

One resident and a Councillor for RBC stated the need for more widespread grants to help regenerate store fronts and more investments to help set up monthly markets or help develop existing ones. There should be more benches or architecture designed to sit on, more planters and investments in hanging baskets in the summer. The Councillor also suggested a need to switch policy towards Community Wealth Building philosophy with Parish councils setting up community hubs and using the general Powers of Competency to purchase leases and own buildings in common to keep rents low and affordable for shops. Keeping economic growth locked into local economies is essential. City centres need to develop more residential areas and parks. High streets can be vibrant when diversified.

A resident commented that Paragraph 7.13 of the GNSP Growth Options consultation document refers to the visitor economy and in particular the leisure-focused redevelopment of intu Broadmarsh, but makes no mention of the potential for housing development there. Since the consultation document was written, of course, intu has gone into administration. This opens up a whole new world of possibility for Nottingham, to re-consider how the potential of this area can be optimised, how it can help the city to adapt to the changed shopping habits, and to other behavioural changes, appropriate to life in the post-2020 world. In particular, the city has the opportunity to re-consider the distribution of living and non-living space in the Broadmarsh redevelopment, and develop the area into an attractive and dynamic place to live, work and play, thus capitalising on the potential of what could become an iconic approach to the city from the main train station gateway.

One resident considered that a change from retail to employment, arts, cultural and other uses will be the key to maintaining vitality and viability. Also ensuring that people live close to local facilities will encourage their use, especially for single people and smaller households, students and the elderly who may not have the means or wish to travel further afield.

A resident commented about an amphitheatre for outdoor theatre, music, shows etc. surrounded by wildlife areas to fill what was the Broadmarsh area. With an area to have outdoor ice hockey/ skating just in case the arena is unable to open safely again. Along with outdoor catering areas.

A resident commented that car parking and bus fares in Nottingham are too expensive.

A resident commented that more widespread grants to help regenerate store fronts, more investments to help set up monthly markets or help develop existing ones. More benches or architecture designed to sit on, more planters and investments in hanging baskets in the summer.

A resident commented that the pandemic has meant that demand for town centre shopping and office working have declined, leaving these sites requiring a new purpose. This appears to provide an opportunity for the creation of new communities. Town centres in many European countries, are already adapted for families to live with a strong green infrastructure, schools and well-connected transport systems offering a quieter and cleaner area that is more attractive to raise children safely. This is particularly pertinent when considering the options for Nottingham's Broadmarsh area, but equally apply to smaller towns and villages. Changing the use of central areas would also generate new opportunities for businesses to service the new population. Empty offices could also easily be converted into accommodation both in and out of towns, with many business parks already provided with excellent transport links and access to local facilities/existing housing areas.

A resident commented that it is essential that city centres are regenerated with imaginative housing projects so that they do not become wastelands. Building 'desirable' housing in green fields diverts development from this aim.

A resident commented:

- Shared village and town spaces (e.g. Poynton, East Cheshire)
- Promote cycling friendly centres with safe storage
- Ensure attractive business rates / grants for the retention of small business and local event plans to encourage footfall (markets, celebrations, cultural events)

A resident commented that the answers may be different for each classification of centres. For instance, I see the City's future as a 'day out' rather than a shopping trip. To help with this the city needs to offer more green spaces which include children's playgrounds and picnic areas. Bars etc., which are busy spots during the evening, should be encouraged to be family friendly during the day. In Town centres people want to be able to access such amenities as libraries, banks, solicitors, accountants etc. so these types of services should be supported and encouraged. In District Centres Local authorities can help maintain the vitality and viability of these centres by ensuring that the amenities they are responsible for are kept open.

A resident stated that this Study has fallen awkwardly in timing, as the impacts the collapse of intu and its long-deferred Broadmarsh

redevelopment; and the sudden rapid acceleration of certain social, shopping and flexible working trends driven by Covid-19 - are yet to play-out, by a long way.

One resident stated that the loss of Broadmarsh as a large conventional retail Centre may yet turn out to be a 'blessing in disguise' provided good-quality alternative uses can be found for the site(s). Another stated that the site should be redeveloped for housing. The occupancy levels in the Central Core areas may decline markedly and the underlying owners of premises are eventually obliged to offer lower rentals. This may, in turn, entice more marginal businesses who still need physical premises to relocate into the Central Core, thereby undermining peripheral shopping provision such as Mansfield Road, Hockley etc. It will therefore become highly desirable to allow greater flexibility for 'change of use' of business premises; and a more proactive emphasis on 'zoning' to create clusters and quarters of mutually-supporting businesses. Leeds like Nottingham are very similar in many ways. Leeds has thought about the priorities of all its small towns making each one an exciting place to visit, live and shop. Bulwell, Hucknall and Beeston should have apartment blocks and also encourage more student blocks with increased night-life economy and more leisure attractions and eateries. West Bridgford should be encouraged to attract designer companies and fine dining restaurants following the example of Pudsey. Alfreton Road in Radford, Hyson Green and Sneinton Dale should be encouraged to celebrate its ethnic diversity. Arnold is like Garforth with on-street shopping. Nottingham should have encouraged a new mall in the area of Netherfield and market rather than its big retail park. Arnold, Beeston, Bulwell and Hucknall need to have more high street shopping options; more tourist attractions need to be in these towns or the city centre such as a Museum for British Sports, Sealife Centre etc.

Where office space is planned, this should be placed near existing public transport routes or public transport extensions should be included in proposed developments.

Three residents stated that more funds were needed to help regenerate store fronts, and to help set up monthly markets or help develop existing ones. More benches or architecture designed to sit on, more planters and investments in hanging baskets in the summer.

Two residents made the same comments as Barton-in-Fabis Parish Council – see above.

Two residents stated the need to focus on encouraging good mental health and recognise/provide for spaces that enhance this. It is well evidenced that green spaces/parks/woodlands are beneficial to promoting good health and wellbeing.

One resident stated that transport improvements are needed - pedestrianising more areas; making it easy and affordable to travel and park; providing more cycle racks/stands for those using bikes for shopping.

Residents commented that car parking to access public transport is a real inhibitor to the use of local shops if commuter parking absorbs shopper parking.

One resident stated that shopping collection sites should be provided so that people can shop in the city but collect from an alternative site, e.g. adjacent park & ride like other cities.

Three residents stated that greater housing in close proximity to the city may encourage greater use of city centre facilities and venues thereby enhancing the economy.

Three residents commented many people buy products from high streets chains online, so encouraging more local innovative and independent retailers, cafes and restaurants need to be encouraged to provide a magnet for increased footfall into town/city centres. This inevitably means lower property rents and business rates.

One resident considered that the building out of town retail parks should be stopped.

Two residents stated that we should consider moving to plastic-free shopping. They asked what can the Plan do to encourage zero waste shopping? Stating we should consider siting clothing recycling banks more prominently in the city centre. Asking should local clothing retailers be encouraged to donate a percentage of all unsold clothes to local homeless and refugee charities?

3. **Question CTC3: Acceptable uses on the edge or outside of centres**

Should local impact thresholds be set to protect retail centres? If so, what should these thresholds be and why?

Summarised comments from statutory organisations

Amber Valley Borough Council consider that the role of Giltbrook Retail Park and other similar locations in the retail network and hierarchy should be addressed in the Plan.

The Parish Councils of **Gotham, Barton in Fabis, Kingston on Soar, Ratcliffe on Soar Parish Meeting, and Thrumpton** stated that the thresholds should be based on proximity to the City Centre as well as the scale of the development, and, that Retail Impact Assessments should consider the likely effects of development on the city centre regeneration strategy and impact on the planned investment.

Burton Joyce Parish Council commented that possibly, but it is a complex and contentious issue. The development of out-of-town shopping areas in the past was the subject of much debate. The present growth and power of internet transactions/companies is a subject of national and international debate. For a village such as Burton Joyce there is a timely opportunity to create improvements to the village and its centre that will attract and keep

people, in appropriate numbers. Funding is key. The same principles can be applied to towns and cities.

Chetwynd: The Toton and Chilwell Neighbourhood Forum commented that it would seem appropriate & necessary to do so. However, unable to comment on what the threshold should be & why.

Granby-cum-Sutton Parish Council stated that the collapse of retail businesses as a result of Covid-19 and associated unemployment makes this impossible for them to answer.

Linby Parish Council comment that they need to be as protective as possible of the existing centres particularly now post Covid-19.

Radcliffe-on-Trent Parish Council commented that the Neighbourhood Plan for Radcliffe on Trent specifies that no retail outlet more than 280 square m is permitted. This discourages larger supermarkets.

Ravenshead Parish Council agreed that local thresholds should be set to protect retail centres.

Saxondale Parish stated that local impact thresholds should not be set to protect retail centres – stating that the market will decide. They commented that the chances of many external retail centres surviving Covid-19 is minimal given that the bigger players are withdrawing from such markets.

Summarised comments from developers

Andrew Hiorns on behalf of Parker Strategic Land commented that the existing centres should be protected against being undermined by development outside defined centres, where the centre could have accommodated the development. This ensures facilities are concentrated and supports viable centres.

Hammond Farms stated that in the light of recent trends in lifestyle changes and technological changes and probably speeded up by Covid-19 Centres as well as retail parks are under threat and are likely to require major remodelling and refocussing over the next generation. The challenge is immense and there will be no easy fix to addressing reduced demand for commercial and retail space as well as city centre support services. The impacts will be felt on commuting patterns and therefore transport and transport infrastructure requirements and wider land use planning including reuse and regeneration strategies for centres across Greater Nottingham will need to be reviewed.

Taylor-Wimpey are not aware of any local evidence to inform preparation of local thresholds.

WSP UK Ltd (Agents working on behalf of Global Mutual / The Victoria Centre Partnership) commented that with regards to main town centre uses draft policy should not refer to acceptable uses on the edge or outside of centres. The sequential approach must apply to all main town centre uses

located outside of designated centres. There is no indication that development needs, comprising main town centre uses, cannot be met with the town / city centres, such that sites outside of centres needs to be considered. There should therefore, be no 'acceptable uses' outside of centres with regards to main town centre uses, unless it can be clearly demonstrated that the need for these uses cannot be accommodated within centres. The demand for many town centre uses is likely to be much lower than previously forecast due to the significant challenges now facing the office, retail and leisure sectors. The NPPF also sets out clear tests for development for town centre uses which is not in a centre and not in line with an adopted plan i.e. sequential and impact tests. Making references within draft policies to 'acceptable uses' outside of town/city centres both cuts across national policy; and undermines the protect town/ city centres in the NPPF. Given the pressures on town/city centres as a result of changing shopping patterns and Covid-19, it is even more pressing that centres are protected at this time. At present, in the recently adopted NCC Local Plan Part 2 the impact thresholds are 1,000 sq.m for retail and 2,500 sq.m for other Main Town Centre uses. Given the Covid-19 crisis, the current economic outlook and the new flexibilities for town centre uses in amendments to the Use Class Order, it is appropriate to have one threshold set at a lower level for all relevant main town centre uses. This will ensure all proposals that have the potential to harm centres are able to be adequately and robustly assessed; and decision makers can make informed decisions to adequately protect City and Town Centres.

Summarised comments from other organisations

The Nottingham Green Party stated that in smaller town centres and district centres, a perceived or actual absence of oversight has led to a proliferation of one type of outlet in an area at the expense of diversity.

The Nottingham Local Access Forum and Pedals both commented that development on the edge or outside the centre tend to attract more private car use and contribute to congestion, and that development should be controlled if it will contribute to climate change or hamper the related carbon neutral target. Additionally, Pedals commented that this means that it is also very important to include good standard cycle and pedestrian access as an integral part of these plans. Similar good access is now all the more important also for trips to and from local shopping centres and facilities.

Nottinghamshire CPRE stated that impact assessments should be carried out and there should be a presumption against allocating land for retail remote from where most people live.

Nottinghamshire Ramblers commented that Yes - such developments increase car use contributing to congestion and air pollution. Include Active Travel access as an integral part of these plans.

Trinity College commented that some developments, particularly at the scale of a SUE, would likely result in a local need for retail and that the

inclusion of such units would be necessary to ensure that the SUE is sustainable in its own right. The ability to meet this local need for retail provision shouldn't be restricted by any policy which seeks to protect existing town centre retail.

Summarised comments from local residents

Many residents thought it was important to consider a local threshold which restricts out of town stores and large retail parks and protects centres particularly the City Centre, though 2 residents commented that we should provide support for local, district and town centres to avoid centralisation in city centres.

A resident commented that during the Covid-19 pandemic it is interesting to note that the Central Avenue area of West Bridgford has become like a 'ghost town' as a result of the preponderance of cafe and restaurants that have been permanently closed over this time. Maybe now is the time to encourage proper retail back into Central Avenue now.

One resident stated that existing centres should be protected against being undermined by development outside defined centres, where the centre could have accommodated the development. This ensures facilities are concentrated and supports viable centres. This should not affect the provision of new centres or nodes in the network, and we have identified how the city can be structured around the 15-minute city network, with local centres or nodes distributed along key routes that help reinforce sustainable movement, and support local communities including providing for new communities.

Two residents suggested that a review of local plans is done and the lowest threshold specified is adopted for this Plan.

Three residents stated that the thresholds should be based on proximity to the city centre as well as the scale of the development, and, that Retail Impact Assessments should also be used to consider the likely effects of development on the city centre regeneration strategy and impact on the planned investment.

Two residents both commented that Local Impact thresholds should not be set, with one commenting that if the shopping model has changed, the centre should be protected only by being more efficient. The other resident commenting that the market will decide, and stating that the chances of many external retail centres surviving Covid-19 is minimal given that the bigger players are withdrawing from such markets.

Chapter Eight: Designing Good Places

1. Question D1: Achieving Well Designed Places

Should we promote the use of consistent design principles or standards across the Plan area? If so, what design tools should be used?

Summarised comments from statutory organisations

Amber Valley Borough Council considers that the issue is unlikely to have a direct impact on Amber Valley.

Aslockton Parish Council considers that the highest standards should be applied, based on a parish-level consultation, with local communities aided and encouraged to produce their own design plans.

Barton in Fabis, Gotham and Kingston on Soar Parish Councils and the Ratcliffe on Soar and Thrumpton Parish Meetings consider that there should be consistent design principles, including those in Neighbourhood Plans, BREEAM standards for commercial buildings, National Design Guide (2019) and Living with Beauty (2020). They also propose the use of Local Lists of non-designated heritage buildings and design review panels.

Burton Joyce Parish Council considers that high quality design is important but that there is a need to avoid uniformity; 'creativity and diversity can contribute to the character of an area'.

Chetwynd: The Toton and Chilwell Neighbourhood Forum supports consistent design principles, however 'some local variation may be appropriate'. The Forum suggests the use of Building for Life, BREEAM, Living with Beauty and national and local design codes. The Plan should also promote 'aspirational and low carbon objectives' and 'self-contained developments'.

Derbyshire County Council proposes the use of the Charter for New Homes Chartered Checklist and the Stagecoach guide on bus services in new residential developments. Cycle storage should also be ensured in residential developments.

East Leake Parish Council proposes Building for Life standards.

Granby cum Sutton Parish Council supports the use of principles or standards to create 'beautiful, enduring and successful places'.

Historic England considers that if consistent design principles or standards are pursued, they should ensure that local distinctiveness for a particular place is not diluted as a result. Historic England also comments that 'Conservation is certainly not a stand-alone exercise satisfied by stand-alone policies that repeat the NPPF objectives' but should be embedded in policies for housing, retail, transport etc.

Homes England and the Defence Infrastructure Organisation

recommend the use of Building for a Healthy Life, Built for Life, Building with Nature, site-specific design codes and independent design review.

Linby Parish Council emphasises the importance of sustainable development, and of public participation. It suggests the use of Neighbourhood Plans.

Natural England supports the use of consistent design principles or standards, which should encourage the incorporation of Green and Blue Infrastructure, net gains for nature and access to green spaces. It would also welcome policies which would encourage development to include green roofs/walls, bird and bat boxes, swift bricks and access in fences for hedgehogs. Green Infrastructure requirements should also be incorporated: a schedule of 'good practice' Green Infrastructure considerations is included in Natural England's comments, based on its 'Green Infrastructure Guidance'.

Nottinghamshire County Council recommends: 'Habinteg' guidance; TCPA guidance; the principles of the 'Housing our Ageing Population Panel for Innovation (HAPPI)'; Building for Life 12; the National Design Guide and RIBA's 'Homes for All Ages'.

Ravenshead Parish Council considers that consistent design principles/standards should be used.

Ruddington Parish Council recommends the use of Neighbourhood Plans.

Saxondale Parish Meeting considers that all new housing should be 'future proofed'.

Severn Trent recommends the use of: SuDS design principles as outlined in 'The SuDS Manual'; design principles outlined in the 'Drainage Hierarchy' in the PPG; and design measures to 'minimise the impact of new development on the water cycle'.

Summarised comments from developers

Barwood Homes considers that there should not be consistent design principles or standards, instead design codes and masterplans should be locally-produced.

Barwood Land considers that 'quality design principles' should underpin site design frameworks and masterplans. It recommends (in subsequent comments) the use of design codes (as in the 'Planning for the Future' White Paper) and considers that the design of good cycle infrastructure is important.

Crofts Development, Davidsons Developments and Harris Land Management propose the use of Building for a Healthy Life.

The Crown Estate suggests that the issue is best dealt with in Part 2 Local Plans.

Fisher German on behalf of Joanna Sztejer and Mr Malcolm

Hodgkinson feel that the issue is best dealt with in Part 2 Local Plans and that any standards must 'ensure no undue impact on site viability'.

Gaintame considers that high quality design should be encouraged but that local guides or codes should not be 'overly prescriptive'.

Hallam Land Management considers that the Plan should promote high quality design and that the 'Garden Communities Prospectus' (2018) should be used.

Hammond Farms and Langridge Homes consider that good design should be supported, however both historic and modern design should be supported and a 'rubber stamping' approach should be avoided.

Mather Jamie considers that there should be strategic design codes.

Parker Strategic Land considers that strategic design codes, masterplans and 'inset codes' should be used.

Persimmon Homes considers that the Plan 'shouldn't tackle this matter, which is arguably best left to each local authority'. Area-specific guidance should not duplicate national guidance and Building for a Healthy Life 'should remain a voluntary rather than mandatory policy requirement'.

Positive Homes considers that standards should be set in Neighbourhood Plans.

Richborough Estates and Samworth Farms feel that the issue is not strategic and should only be dealt with in Part 2 Plans.

Taylor Wimpey feels that reference to national planning policy and guidance is important.

Trinity College would like space standards, Building for Life and 'technical standards' to be used.

The 'Trustees of the Locko 1991 Settlement' consider that this is not a strategic matter and would be best dealt with in Part 2 Local Plans.

William Davis and Wilson Bowden consider that design policy should avoid being 'overly prescriptive' or too detailed.

Summarised comments from other organisations

Beeston and District Civic Society considers that the City of Nottingham's design guides are good local examples.

The Home Builders Federation considers that the approach should be consistent with the NPPF, the NPPG and the National Design Code. Any guidance should be locally-specific. Building for a Healthy Life is relevant, however the use of such guidance should be 'voluntary'.

Kase Aero supports the use of consistent design principles/standards.

Keyworth Conservation Advisory Group considers that Building for Life should be used. Design principles should be 'relevant to the local vernacular', however 'standards should be compatible across the Plan area'. 'Sustainable' materials should be required.

Nottingham Green Party recommends the use of the 'Passivhaus Standard'.

Nottingham Local Access Forum supports consistent design principles and considers that they should include infrastructure for active travel, cycle storage and proximity to green spaces.

Nottinghamshire CPRE wants consistent design principles and recommends the use of the CPRE's design guides.

Nottinghamshire Ramblers considers that consistent design principles should be applied; they should encourage walking and cycling, including connections to wider networks and to nature. The Rights of Way network around developments should be reviewed and enhanced.

Pedals (the Nottingham Cycling Campaign) wants consistent design principles to support cycling and walking, and recommends the use of the Department for Transport's 'Core Design Principles for Cycle Infrastructure Design'.

Tollerton Against Backdoor Urbanisation considers that design is very important, however it 'should be left to individual authorities to decide their approach'.

Summarised comments from local residents

Nearly all local residents who made representations on this issue support the importance of good design.

Many people propose the use of: BREEAM standards for commercial buildings; local lists of non-designated heritage buildings; design review panels; the National Design Guide (2019); and Living with Beauty (2020).

Other design tools proposed are Building for Life 12, Lifetime Homes and Designing Out Crime.

Several people however oppose the use of consistent design principles or standards across the plan area on the basis that 'different designs are required to maintain local identities'. Related comments are that: 'every development should be designed given the local context' (including local history, Conservation Areas and Listed Buildings); and that 'design principles and standards should be applied consistently with the character of the local surroundings'.

Several people also emphasised the importance of Neighbourhood Plans and/or felt that design issues should be decided at individual authority level.

Some felt that parking standards should be updated to ensure sufficient off-road provision for modern-sized cars.

Other comments included:

- Building to customer specification should be encouraged;
- Large single-supplier developments should be discouraged;
- There should be more consistency and standardisation;
- However, another resident felt that 'off-the shelf' designs should be avoided;
- Design should encourage home-working;
- 'Trained and independent assessors' should be used at the application stage;
- Enforcement of design principles is important too;
- Pedestrian and cycling linkages are important;
- Designing out crime is important;
- All new homes should be carbon-neutral and have solar panels;
- Any proposed housing should be in keeping with existing housing/architecture.

Several Rushcliffe councillors, making representations as individuals, consider that design is important; they propose that Neighbourhood Plans and trained independent assessors should be used.

2. **Question D2: Conserving and Enhancing the Historic Environment**

How can the Plan provide a positive strategy for the conservation and enjoyment of the historic environment?

Summarised comments from statutory organisations

Amber Valley Borough Council considers that the issue is unlikely to have a direct impact on Amber Valley.

Barton in Fabis, Gotham and Kingston on Soar Parish Councils and the Ratcliffe on Soar and Thrumpton Parish Meetings recommend promoting Local Lists, Neighbourhood Plans and best practice guidance.

Bradmore Parish Council comments that large development near to Bradmore Conservation Area would be inappropriate.

Burton Joyce Parish Council feels that there should be 'a pro-active approach to the listing of buildings and identification of sites of community value'; however, there should not be a 'rigid formula'. Education and information are also very important.

Calverton Parish Council proposes that the Plan could establish a mapped database of heritage assets that benefit from open settings; and that the site selection process should identify heritage assets and their wider settings at the earliest stages.

Chetwynd: The Toton and Chilwell Neighbourhood Forum proposes that the Plan should identify all ‘heritage and non-heritage assets’; it should conserve them and highlight their history and importance to the area and community.

Granby cum Sutton Parish Council recommends making use of the expert knowledge of organisations such as Nottingham Civic Society and English Heritage.

Historic England recommends a ‘positive strategy’ including protecting assets, contributing to local character/distinctiveness and emphasising historic significance.

Linby Parish Council considers that the Plan needs to ‘recognise that heritage is part of the infrastructure of our modern communities and economies’ and that the Plan should recognise ‘the importance of the role of the historic environment in delivering economic and heritage led regeneration’.

Ruddington Parish Council comments that overdevelopment of Ruddington Village ‘would not have a positive effect on the conservation of its history’.

Saxondale Parish Meeting considers that there should be ‘greater drive by Councils to take over historic sites’.

Summarised comments from developers

Hammond Farms and Langridge Homes ‘generally support measures to conserve and enhance the historic environment’.

Parker Strategic Land considers that ‘the value of the historic resource should be identified early in the conception of plans’.

Samworth Farms considers that ‘a balanced approach must be adopted’ and that great weight should be given to ‘sustainability’ issues.

Taylor Wimpey recommends that the Plan should follow national policy and guidance.

Trinity College considers that development schemes should be informed by an understanding of heritage assets but ‘need to be viewed as part of the wider objectives of the Local Plan’.

The ‘Trustees of the Locko 1991 Settlement’ consider that ‘a balanced approach must be adopted’ and that great weight should be given to ‘sustainability’ issues.

William Davis considers that early identification of assets is important and that a balance is needed between protection and allowing sensitive development.

Summarised comments from other organisations

Kase Aero proposes that the Plan should allocate land for the expansion of Edwalton Churchyard and new community facilities, in connection with development plans for the golf course.

Keyworth Conservation Area Advisory Group considers that new development should be sympathetic to local character, however 'not necessarily a carbon copy of what has gone before'.

Nottingham Green Party considers that buildings of special historic interest need to be conserved for future generations.

Nottingham Local Access Forum considers that historic green spaces should be conserved and promoted.

Nottinghamshire Ramblers wants the Plan to ensure more areas free of traffic and parked vehicles, in order to allow pedestrians and cyclists to 'immerse themselves' in historic environments (such as Beeston Canal).

Tollerton Against Backdoor Urbanisation considers that new development should be 'at a suitable distance from historic areas and buildings'.

Summarised comments from local residents

Nearly all local residents who made representations on this issue support the protection of the historic environment.

Many local residents echo the views of Ruddington Parish Council regarding protection of the village's heritage.

Two people consider that a 'balanced approach' is needed between the protection of heritage assets and 'ensuring a sustainable pattern of development', including considering climate change and boosting housing supply.

Other comments included:

- Preserving and nurturing sites of historic value and beauty should be a priority;
- There should be a consistent approach across all areas;
- The Plan should identify and assess all historic buildings and structures;
- The Plan should ensure that any development protects the context of listed buildings as well as the buildings themselves;
- Heritage assets have 'significant meaning' for communities;
- Plans for development should be required to highlight historic sites;
- The Plan should 'attempt to establish a mapped database of the heritage assets which benefit from an open, undeveloped setting', and protect these assets;
- Grantham Canal should be preserved and restored;

Several Rushcliffe councillors, making representations as individuals, consider that 'protective areas' need to be defined around historic settlements and that it needs to be ensured that traffic from large new development does not harm these settlements.

Chapter Nine: Infrastructure to Support Growth

1. Question IN1: Infrastructure to Support Growth

Are there any barriers to future housing or economic development in terms of necessary infrastructure provision, and if so what are they?

Summarised comments from statutory organisations

Most comments from Parish Councils related to specific settlements and their existing infrastructure capacity in relation to their ability to accommodate future housing growth.

Bradmore Parish Council noted that there are deficiencies in strategic infrastructure for any form of development at the site Land East of Loughborough Road.

Radcliffe on Trent Parish Council commented that the A52 is extremely busy and unable to support existing planned development in Rushcliffe East let alone potential new development. Further development in Rushcliffe East should be put on hold until further transport impact studies have been carried out and commitment and funding secured for fundamental improvements to the A52 East including a new link road from the Saxondale A46 / A52 junction to Holme House or an upgraded link from the Stragglethorpe A46 junction to Holme House. Improvements to the train service are needed. Additional capacity is also needed at the Health Centre which is currently unable to cope.

Ruddington Parish Council commented that there is no way to improve the infrastructure within Ruddington and so it is not sustainable to build more houses here. Traffic within the village is close to crisis point prior to the four approved schemes being built.

Tollerton Parish Council commented that poor access onto the A52/A606 would mean traffic mitigation through Tollerton would be required. This would include Green Lane designations and the creation of off-road cycling and walking routes.

Urban Vision Enterprise on behalf of Linby Parish Council noted that the AECOM report stated that the road infrastructure around Linby and Top Wighay is at capacity and requires further modelling. Funding is also needed to remove barriers such as the lack of public transport provision (bus network in particular); community infrastructure (e.g. health care and education); and communications infrastructure including 5G and super-fast fibre broadband.

Statutory consultees also made suggestions for specific infrastructure that should be considered, for example **Amber Valley Borough** suggested the plan should propose a tram extension along the A610 corridor, potentially extending to Langley Mill, Heanor and Ripley. This would enhance

employment opportunities for Amber Valley residents and make the eastern part of the borough more attractive to businesses.

Granby cum Sutton Parish Council suggested that finance should be provided to extend transport links and high-speed communications to rural areas.

Several Parish Councils, including **Barton in Fabis, Gotham and Ratcliffe** commented that suggestions within the Planning for the Future White Paper should be carried through to the Growth Plan, such as the proposal to capture land value uplift when permission is granted. This would ensure the provision of facilities and enhance communities.

Ravenshead Parish Council noted that the current approach to securing funding often led to a hiatus between the completion of a new development and the infrastructure being provided, with infrastructure being key to making good places to live. Aslockton Parish Council agreed, suggesting development should be prevented until the needed infrastructure is provided.

Severn Trent was the only utility provider to respond to this question, stating that further detail was needed on the potential development sites to understand the impact on infrastructure. They noted that significant growth in Hucknall would require significant improvements.

HS2 limited also commented that they supported the aspiration for HS2 to be a catalyst for growth. They suggested future versions of the document should mention land safeguarded for Phase 2b as some sites do intersect the route and that further flexibility should be incorporated into the plan as changes to Phase 2b may arise.

Melton Borough Council also asked to be consulted on any policies and strategies that would impact areas and settlements within their area, with the Councils needing to work together to create benefits for the regions current and future residents.

In terms of future healthcare provision, **NHS Nottingham West Clinical Commissioning Group (CCG)** highlighted that current British Medical Association guidance suggests around 1800 patients per GP so it is incumbent on the NHS and the local authority to look further ahead to ensure appropriate healthcare provision for the increase in population of future housing developments. The CCG requests that each local authority notifies the CCG when housing applications are received from developers in order that Section 106 monies can be secured at an early stage to ensure viability of the development in terms of healthcare provision.

Summarised comments from developers

Landowners and developers who responded promoting their own sites, in terms of these being able to provide infrastructure to support the proposed development but also commented that the delivery of infrastructure itself, whilst important, can act as a barrier to development coming forward. This is

due to several factors, including reliance on multiple stakeholders, viability issues, lack of co-ordination between developments and a lack of investment.

Both the **Crown Estate and Hallam Land Management** suggested that locations with good existing infrastructure or where new infrastructure is planned, would be the most appropriate places for strategic sites to ensure development comes forward and avoid some of the barriers identified.

Both **Hammond Farms and Langridge Homes** identified Gedling as an area that has suffered from a lack of investment. Future investment in infrastructure is needed to unlock the potential in this area.

Marrons Planning on behalf of Davidsons Developments Ltd highlighted it is the responsibility of plan makers to engage with stakeholders and set realistic, deliverable policies for strategic sites. The consultation document includes transport-led and green and blue infrastructure-led growth strategies. This hybrid approach is supported but the timescales for the transport and infrastructure elements of this must not prejudice delivery or delay growth. It is imperative that growth is not reliant on the delivery of major infrastructure projects such as HS2 or improvements/extensions Nottingham Express Transit given the potential for funding barriers, delays and/or non-delivery.

Persimmon Homes commented that S106 and Community Infrastructure Levy contributions must be set at a viable threshold based on a full plan viability to ensure the deliverability of the Plan isn't compromised. Contributions should be allied to each development requirement. Where broad infrastructure improvements are needed these should be costed and identified with state grant funding actively sought to offset costs.

Positive Homes Ltd said that Nottinghamshire has lots of poorly used stations - a metro style turn up and wait train service should be created from every existing station within 30 minutes of Nottingham as a minimum and those towns and villages developed accordingly. This should link to an expanded tram system to Gedling, the airport and Ruddington, and ideally a park and ride at the A46/ A606 junction. This is easier than adding more roads.

Taylor Wimpey (agent Savills) said that the current consultation by the Government might abolish S106 and CIL and therefore suggested that the authorities take a lead from this level.

Other comments received included support for an Infrastructure delivery plan from **Avison Young on behalf of Homes England and Defence Infrastructure Organisation**.

Summarised comments from other organisations

Comments from other organisations concentrated largely on identifying what infrastructure is needed to enable good developments and communities. This included considering internet connectivity and its impact on economic development; access to financial services in small towns and villages; increasing solar and wind energy developments to support future

developments; creating charging points for electric vehicles; improving access to public transport - including better rail connectivity over the River Trent as well as an additional river crossing over the Trent.

Rushcliffe Borough Council Leake Ward members also noted that the current approach to securing funding often led to a hiatus between the completion of a new development and the infrastructure being provided, with infrastructure being key to making good places to live.

Councillor Rex Walker for the Gotham Ward, commented that suggestions within the Planning for the Future White Paper should be carried through to the Growth Plan, such as the proposal to capture land value uplift when permission is granted. This would ensure the provision of facilities and enhance communities.

Rushcliffe Borough Councillor Mike Gaunt, who represents the Ruddington Ward, commented that there is no way to improve the infrastructure within Ruddington and so it is not sustainable to build more houses here. Traffic within the village is close to crisis point prior to the four approved schemes being built.

Nottingham Green Party, Nottingham Local Access Forum and PEDALS commented that Chapter 9 did not refer to walking cycling and infrastructure within the area which will be key to promote more sustainable methods of transport. They suggested the importance of the new Trent Basin/ Lady Bay foot-cycle bridge should be acknowledged within the plan and integrated with other developments, such as the Trent Gateway Project proposed by the Environment Agency.

PEDALS also outlined that the DfT Transforming Cities Fund (Tranche 2) was a key opportunity to fund proposals such as extending the Eastern cycle corridor and improving routes to connect beyond Nottingham, such as creating active travel routes with Derby.

Equipped2 Succeed and Second Chance Learning Academy said that infrastructure planning must not forget about people development as this enables thriving communities. Solutions need to be the focus rather than issues and enable people to create a positive future for themselves, their families and communities.

The Homes Builders Federation and Keyworth Conservation Advisory Group both commented that funding and viability is key to consider. Contributions from developers are essential and The Homes Builders Federation suggested a whole plan viability assessment should be undertaken.

Railfuture (East Midlands Branch) commented that new and existing residents should have easy and efficient access to employment, amenities, and leisure and that a sustainable, reliable public transport network is needed to support expansion of housing in the Nottingham area. There is sufficient additional capacity within the existing heavy rail network to

integrate this into a 'metro style' network including the NET system and fast bus routes. The opportunity therefore exists to use the need to provide new housing to help justify a much improved 'metro style' transport network of rail, NET and express bus services in which the location of new housing is planned in areas where existing underutilised rail and potential new NET line extensions are situated.

Summarised comments from local residents

Just under half of the responses received to Question IN1 were from local residents. Most comments noted the importance of providing infrastructure alongside planned growth, with some making specific suggestions on the types of infrastructure needed and commenting on specific settlements.

Most respondents emphasised the importance of delivering infrastructure to support housing growth and development, with infrastructure seen as essential to building good communities. Many suggested that prior to choosing which sites should progress, infrastructure capacity within an area should be assessed with consideration given to the cumulative impacts of existing and planned developments on the capacity. Key stakeholders should also be involved before any decisions on sites are made. There was also concern that infrastructure provision was not evenly spread across Nottingham, with a few residents suggesting new development should occur only where there is existing infrastructure. Surface water and drainage should also be considered.

Some respondents also suggested that infrastructure should be developed prior to any housing development to ensure it is in place before additional demand is added. Developers should be penalised if the promised infrastructure is not completed. One resident even suggested that consultation on infrastructure development should have occurred prior to developing this plan to ensure there was more up to date information available. One resident stated the information was already out of date as it was collated before the COVID pandemic.

Residents voiced concerns that the existing road infrastructure cannot cope with extra cars with one resident commenting that is often quicker to cycle than take the bus. It was suggested there should be a new south river crossing within Rushcliffe so roads could cope with increased traffic from new developments. Although the Plan outlines that improvements to the A52 junction are needed, this does not support large developments east of Nottingham.

Residents also considered the importance of ensuring improvements to alternative transportation methods to promote healthy lifestyles. Suggestions included extending the tram network to East Midlands Airport, improving cycle routes, and creating green corridors. It was suggested that the former mineral railway line in Gedling be converted into a multi-user route to connect major developments already occurring within Gedling with green spaces such as Colwick Park and Holme Pierrepont.

Residents also made comments on specific settlements, notably areas that have recently experienced growth from multiple housing developments such as East Leake, Calverton and Ruddington. Concerns were raised that current infrastructure, such as sewage, roads schools and doctor surgeries, is already unable to cope due to the recent growth. Therefore, before considering more housing developments within these settlements, serious investment is needed.

2. **Question IN2: Priorities for Development-Funded Infrastructure**

Are there any priorities for development-funded infrastructure that we should set out?

Summarised comments from statutory organisations

Comments from statutory organisations were mainly focused on specific infrastructure requirements and suggestions.

Amber Valley Borough Council suggested a tram extension to serve Giltbrook retail park and Langley Mill.

Barton Parish Council commented that school sites are old and constrained.

Derbyshire County Council commented that their Key Cycle Network will complement and enhance the local cycle network, enabling sustainable journeys to local and more distant destinations across the County.

Nottinghamshire County Council commented that the Plan will need to include policies on developer contributions with solutions for education incorporated into the plan from the outset. The cumulative impact of sites also needs to be considered, with developers working collaboratively to help deliver sufficient school capacity.

Radcliffe on Trent Parish Council suggested increasing the number of stopping trains at the local station, connecting the train with East Midlands Parkway and the Robin Hood line, and using the line between Radcliffe and Colwick for communities and freight. They also suggested upgrading Holme Lane for cycling and increasing the number of charging points for electric vehicles in Rushcliffe.

Ravenshead Parish Council said that infrastructure was key to place making.

Urban Vision Enterprise, on behalf of Linby Parish Council, suggested the creation of more green areas and better cycle and walking links.

Woodborough Parish Council commented that development funded infrastructure was best achieved through urban extensions rather than rural development.

Summarised comments from developers

Comments from developers largely focused on ensuring that capacity of infrastructure needed to be considered and that the plan should be transparent in outlining what infrastructure is required for which developments and how this will be funded. Where improvements to infrastructure is identified, these projects should be prioritised with pooling between private and public funding occurring to ensure its delivery. **Marrons Planning on behalf of Crofts Development Ltd, Davidsons Developments Ltd, Harris Land Management, and Mather Jamie Ltd**, commented this would prevent much needed growth being delayed due to lack of infrastructure provision.

Detailed comments were also made in relation to specific sites and how development could aid with planned infrastructure. **Geoffrey Prince on behalf of Langridge Homes** made wider comments on the need for infrastructure commented in the East and North East areas of the plan area, with investment needed to improve/upgrade the A60 Mansfield Road Corridor, extending the LRT along Mansfield Road to Leapool Island and building a park and ride site.

Oxalis Planning on behalf of several unknown landowners and developers also suggested that opportunities to help bring forward investment in infrastructure which will enable sustainable growth to occur should be explored. For example, the development of new link roads, tram extensions and active travel (cycling and walking) connections will all help to promote sustainable transport.

Positive Homes Ltd commented that public transport and cycling should be prioritised ahead of cars. All land use is a choice, and we should choose to dig up roads and replace them with cycle lanes and create a proper metro train and tram service.

Summarised comments from other organisations

Comments received from other organisations largely focused on providing more sustainable and active transport, ensuring that all housing developments had viable alternatives to personal car use. **Nottinghamshire CPRE** outlined that this was key with resources needing to be pooled together and developers aware of what element their contributions relate to.

Nottingham Local Access Forum and **Pedals** support a coordinated approach to ensure well connected and coherent links. **Rushcliffe Green Party** suggested rapid and frequent connections between the cities of Nottingham, Derby and Leicester via a metropolitan style rail network which could connect to the tram networks.

Railfuture (East Midlands Branch) commented that the need to provide new housing is an opportunity to help justify a much improved 'metro style'

transport network of rail, NET and express bus services in which the location of new housing is planned in areas where existing underutilised rail and potential new NET line extensions are situated. Most development options are on the edges of existing suburbs and towns within the conurbation, with major new employment and commercial opportunities being planned for the areas bounded by Toton, East Midlands Airport and Ratcliffe on Soar. Other major employment areas include the two universities, QMC, and developments on the former Boots and Plessey sites in Beeston. With improved physical links between the NET, rail services at Nottingham Station, and the nearby bus station, the full potential of the 'metro' network could be realised. More frequent services would remove the need for the expensive option of a new road crossing. New Park & Ride facilities should also be established; for example, at Bingham / Saxondale.

Rushcliffe East Leake Ward members were concerned how much unplanned development would be approved prior to the Infrastructure Development Plan.

Summarised comments from local residents

The majority of respondents felt developers should be fully responsible for funding any infrastructure requirements that arise due to their development. Some residents suggested that developers should be penalised if they fail to deliver infrastructure and that infrastructure should be in place prior to homes being developed to ensure a good sense of community, particularly in larger housing sites.

A number of residents also commented on key infrastructure that was required, such as health care and education facilities, provision of cycle ways, green and open spaces, internet connectivity and upgrading road networks.

Several residents suggested potential infrastructure projects such as a park and ride for Bingham and utilising the old mineral railway line from the Chase Farm development into Netherfield, as well as re-configuring the train lines and stations in the Carlton/Netherfield area to link up with such a tram line. One resident suggested a northern outer loop road would be needed for any proposed sites north of the conurbation to release the pressure upon the road networks.

One resident suggested the money instead should be given to local people to decide where it should be spent.

3. **Question IN3: Timely Provision of Infrastructure**

How can we ensure the timely provision of necessary infrastructure?

Summarised comments from statutory organisations

Comments from statutory organisations again largely focused on the importance of infrastructure and its delivery. Several comments were also made about specific settlements and related infrastructure.

Amber Valley Borough Council again raised concerns that the plan did not mention a tram extension to serve Giltbrook Retail Park and Langley Mill, with potential to extend to Heanor and Ripley.

Bradmore Parish Council commented that site R12.4 should not be considered further, and **Long Bennington Parish Council** also raised an objection to the site R05. **Radcliffe on Trent Parish Council** suggested that a link road should be provided to join the A46 and A52 to bypass Radcliffe on Trent. If this is not possible, it is important to urgently examine the feasibility of dualling the A52 between Nottingham and Grantham with by-pass sections. Securing funding and commitment to this should be a key priority for the Greater Nottingham Strategic Plan.

The Department for Education stressed the need to ensure an adequate supply of sites for schools. Future drafts of the plan should highlight the requirement for contributions to enlarge existing schools and provide new schools. However, a degree of flexibility is necessary as the need can vary over time. Any contribution will be confirmed at the planning application stage.

Derbyshire County Council noted that the levers available via the planning system should help ensure infrastructure is provided in a timely manner.

Granby cum Sutton Parish Council suggested the plan should be worked backwards to provide a realistic timetable for provision and that payments should be by results and penalties imposed to hold companies to account.

Papplewick Parish Council and Ravenshead Parish Council both outlined how infrastructure was essential to deliver sustainable development and deliver good places and communities, as estates without infrastructure are often soulless.

Severn Trent also agreed that infrastructure should be provided in a timely manner, with clear locations and plans for development needed alongside confidence in the development and timeline to be able to understand the service provision needed.

Urban Vision enterprise, on behalf of Linby Parish Council, agreed that timely provision of infrastructure is key though suggested contributions and the infrastructure should be provided prior to occupation of developments.

Summarised comments from developers

Several developers considered the issue of funding infrastructure. **Marrons Planning on behalf of Davidsons Developments Ltd, Harris Land Management and Mather Jamie Ltd, and William Davis** commented that any infrastructure plan should detail specific infrastructure requirements and how this will be funded. This will prevent developments being delayed by reliance on the delivery of national infrastructure. **Oxalis Planning**, on behalf of several unknown landowners and developers, agreed that the GN Authorities should ensure that a lack of investment in infrastructure does not

prevent strategic growth from coming forward over the plan period. Opportunities to secure investment therefore need to be explored.

Savills, on behalf of Taylor Wimpey, suggested that public sector investment was needed to forward fund development, with **Andrew Hiorns Planning, on behalf of Mather Jamie**, suggesting that government proposals to allow authorities to borrow against future income from developments should be explored. **Geoffrey Prince Associates, on behalf of Hammond Farms and Langridge Homes Ltd**, recommended that local authorities should fund infrastructure by issuing low interest-bearing bonds, with varying payback dates, to the investment sector so authorities could claw back funding from development charges, public land sales and user charges.

Andrew Hiorns Planning, on behalf of Mather Jamier, Avison Young on behalf of Jelson Homes and the Wheatcroft Family, and Parker Strategic Land Ltd commented that only sites which can demonstrate they can deliver the infrastructure required; are viable, and free from physical constraints should be allocated.

Bidwells, on behalf on Trinity College, commented that viability is a key consideration for proposed sites because, if sites are not viable, development will stall.

Comments from a number of developers focused on specific sites which they had put forward for consideration, stating how these sites could help deliver planned infrastructure, or would not harm existing infrastructure, and could be delivered in a timely manner.

Summarised comments from other organisations

Several respondents highlighted the need to co-ordinate and ensure forwarding planning of infrastructure. **Nottingham Local Access Forum and PEDALS** commented that coordination is key to delivering coherent active transport infrastructure. **Beeston District and Civic** society noted that subsequent Planning for the Future consultations may provide practical centralised options and that there may be good examples elsewhere.

Nottinghamshire Green Party suggested that funding from central government should become freer following COVID and Brexit but private money is still needed to fund infrastructure and achieve sustainability.

Nottinghamshire CPRE again commented that housing or employment sites should deliver necessary infrastructure prior to being occupied.

Tollerton Against Backdoor Urbanisation said that areas with current development should not have sites allocated so to avoid delays in development coming forward.

RBC East Leake Ward Members emphasised the importance of infrastructure and that the growth options need to be fully examined and the cumulative effects considered to ensure the necessary infrastructure is

delivered at the right time. As soon as funds are collected infrastructure should be provided as soon as possible.

Railfuture (East Midlands Branch) commented that consideration should be given to possible NET extensions that could support decisions on housing development. With improved physical links between the NET, rail services at Nottingham Station, and the nearby bus station, the full potential of the 'metro' network could be realised. Locating new housing in areas where existing underutilised rail and potential new NET line extensions are situated will encourage people to use the 'metro' system, taking advantage of clean, environmentally sustainable and integrated transport for access to employment, leisure and education, thereby reducing their reliance on cars and helping the carbon reduction targets set for Greater Nottingham to be achieved.

Summarised comments from local residents

Most responses from local residents highlighted the importance of planning for, and delivering, infrastructure early on within any new development. This would then ensure infrastructure does not have to be retrofitted and allows for infrastructure to be provided in a coordinated,

logical manner. Many residents went further and suggested that developers should be required to deliver the infrastructure prior to housing being occupied. For example, the tram extension should commence now so it is in place prior to housing being built. Where infrastructure is not provided, penalties should be applied.

Some residents also discussed how infrastructure should be funded, with a suggestion that, since borrowing will be needed to fund infrastructure, a levy should be paid on the development. Annual payment of the levy should be agreed with the developers before development can commence and shall not be varied by the speed with which the development takes place. The risk would then lay with the developer and not the Council. Another resident suggested Bank bonds should be used so that there is funding available if a developer fails to complete the infrastructure.

One resident commented that local authorities fail to consult local people and if there was regular dialogue and involvement of local people this would benefit long term planning. Councillors' powers to approve such things should be reduced and power given to the local people.

Another commented that Rushcliffe is already facing massive growth in housing in East Leake, West Bridgford, Bingham, Keyworth, Radcliffe and other settlements and the three strategic sites at Edwalton, Fairham Pastures and East of Gamston. The pressure these will exert on the facilities of towns and the implications for congestion and pollution are serious. The impacts on the A52 and at Trent crossings should be addressed before any more development is allowed.

Chapter Ten: Any Other Issues, Commenting on this Document and Next Steps

1. Question OI1: Any other issues

Are there other issues you wish to raise, if so what are they, and what topic do they come under?

Summarised comments from statutory organisations

Aslockton Parish Council Summary of sustainable development from the NPPF (2012) provided. Sustainable development must be at the heart of any planning for future development and planning must be evidence-based and transparent if it is to fulfil basic conditions of good governance. The Greater Nottingham & Ashfield Housing Needs Assessment Final Report was issued only a week before the end of the consultation period and so there was insufficient time to examine contents and respond accordingly. The consultation period should have been extended.

Barton in Fabis Parish Council Covid-19 pandemic has reduced number of responses.

Coal Authority: pleased to see that the Growth Options document indicates that geo-environmental considerations will be assessed as part of the growth options. It is assumed that this will include assessing any risks and/or constraints posed to growth options/development proposals by past coal mining activity. No comments on the specific questions asked in the consultation.

Derbyshire County Council The lack of prior and constructive engagement between EBC and the neighbouring upper and lower tier authorities within the Derby and Greater Nottingham HMAs on strategic matters could undermine the 'soundness' of the Erewash Core Strategy.

'Urban Intensification' supported in principle but not at the expense of good urban design principles. Lack of reference to landscape throughout the document.

Given the locations of sites for potential growth, do not anticipate any significant impact schools generally though site B07 in South Broxtowe may have an impact. Reference should be made to the Derbyshire Developer Contributions Protocol.

Environment Agency: are currently working to produce a local version of flood risk standing advice (LFRSA) which will be applicable across the Greater Nottingham area, so the EA will no longer need to be consulted for bespoke comments. Could the LFRSA be incorporated into the Strategic Plan, or as part of an updated Strategic Flood Risk Assessment (SFRA)?

Erewash Borough Council congratulates the councils on conducting a consultation that respects the COVID-19 restrictions without having to make any formal amendments to the four SCIs which establish the legally binding arrangements for public consultation activities through the plan-making process.

Flintham Parish Council wish to raise very strong concerns on suggestions included in some proposals put forward for the Strategic Plan and wish our points to be looked at in connection with roads, schools and medical facilities. The council feel in this sphere of life in our area there will have to be extremely careful thought given to what is developed and what facilities are to be provided, to ensure that the current lack of them is not worsened.

Kegworth Parish Council (KPC) wants to see sustainable transport solutions and improvements and has developed an Active Travel Plan. We support improved cycling and walking routes and good connectivity. Long Lane, potentially a 'Quiet Lane', is used for cycling and walking/leisure and stretches from Kegworth northwards over the A453 towards the Ratcliffe-on-Soar Power Station and Rushcliffe. KPC wishes to reduce air and small particle pollution and noise pollution. As a last resort in any proposed development, KPC asks that the impact on viewpoints and landscape should be mitigated against with landscaping, tree planting for carbon capture and other climate friendly measures.

Linby Parish Council commented that the additional points are primarily about ensuring that future growth is sustainably located and where new development is sited that appropriate levels of infrastructure are included: 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. 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.

North West Leicestershire District Council: Areas in Rushcliffe borough (R15.1, R15.2 and R15.3) have the potential to impact upon the environment and transport infrastructure of the locality, including the A453, M1 and A50 and the area around Kegworth in North West Leicestershire. There is also a question regard how deliverability of the International gateway might be impacted by growth in the southern Nottingham area.

It is important, therefore, that the Greater Nottingham Strategic Plan should have regard to a wider area than just that covered by the plan, including the

need to take full account of the potential cumulative impact upon the wider area.

Nottingham Local Access Forum Active travel is critical to any consideration of travel, transport and growth options in the future. The Covid pandemic has emphasised that good access on foot and by bike to attractive green open spaces is a vital way of helping to promote peoples' mental and physical health.

Nottinghamshire County Council: The Government are currently consulting on Planning Reforms and there are proposals for devolution in the East Midlands, including a Combined Authority. This needs to be embraced. Support BO2.1 and RO7.1

Stanford on Soar Parish Council consider new housing through urban regeneration to be the preferred strategy for meeting housing needs up to 2038.

Where housing need cannot be met solely through urban intensification (our preferred strategy option), the parish council would support a transport led strategy - Sites such as close to the M1, A453 and A52. HS2 could further improve the transport links thus giving further opportunity for development.

A more dispersed growth strategy impacting on green belt/ land suitable for agricultural not supported. Suitable expansion should be on a case by case basis

Green and blue infrastructure led strategy not supported. Ecological/Flooding implications questioned. The current road networks and infrastructure would need some major improvements to make this strategy achievable.

Strongly object to R17 site as:

- The site is grade 2/grade 3a land, protected by NPPF.
- Adverse impact to public rights of way, listed buildings, including detrimental effect of the character and setting of the Grade I listed Church of St James. impact on traffic
- (creating a rat run for motorists between Loughborough and the M1).
- Stanford on Soar is already facing large scale development (Riggetts Green).
- Significant flooding in surrounding area and new development would exacerbate.
- little commercial benefit to Nottingham businesses.
- previous application reference: 14/01589/FUL refused and appeal dismissed by Planning Inspectorate.
- site R17 considered totally unsuitable and believe an urban intensification strategy should be favoured over new developments in open countryside which would result in the loss of vital good quality agricultural land and green space.

Thrumpton Parish Meeting Object consultation process has been poorly communicated and pandemic also impacted public meetings etc. Request that the process is suspended given multiple issues associated with the consultation, its underpinning data, factual errors, and missing information. This letter will not be considered until the Greater Nottingham Joint Planning Advisory Board meets on 22 September – obviously after the consultation period has closed. Particularly concerned that the underpinning Greater Nottingham Growth Options Study July 2020 (GNGOS) is now out of date given all assumptions are based on a pre-COVID-19 world. Consider it to be fundamentally flawed in terms of its scope and “study and principles” and contains serious inaccuracies, with limited or missing analysis – particularly related to the assessment of the A453 corridor (Site R15).

Tollerton Parish Council Object to consultation conducted during the traditional summer holiday and post lock down.

Whatton-in-the-Vale Parish Council: Very concerned about the potential for merging of villages to create a conurbation. Already seeing this with the development at Edwalton. Keyworth (along with East Leake) is currently seeing substantial housing developments. Keyworth already has a village plan so why is it there is a need to discuss further potential development? The land east of Stanton (R14) which has been marked down as a possible growth option is a huge area. Its potential purpose is listed as 'Non-strategic development'. Can you advise us on the description of this land? Any development there would have a big impact on traffic on the A606, quite apart from the destruction of valuable farming land and green belt. Looking further afield, it's stated that the HS2 hub at Toton will be highly accessible to all within the Greater Nottingham area. We disagree with this - in this area we will have no easy public transport links to this so it could only see increased use of cars to access it. Regarding out of town office developments. we can see a danger of Nottingham city centre becoming a ghost town if large out of town office developments are allowed, particularly now that many people have experienced working from home and employers have realised that this is a viable option.

Willoughby on the Wolds Parish Council Willoughby on the Wolds parish council should strongly object to the overall Strategic Plan which they felt would adversely affect their area because so many properties were being put forward as proposals for new housing in Rushcliffe. The council are concerned that existing traffic difficulties will be multiplied if the development plans for the Rushcliffe area went ahead.

Woodborough Parish Council Objects to site G08 to be developed for housing as during flooding episodes, this site stands in the path of excessive flows of water and sediment. The development itself may flood and flooding in the village may worsen as the developed area reduces the amount of water able to seep away before entering the village. In addition, development of this land for housing will remove the possibility of construction of a scheme to mitigate flooding.

Furthermore, there is no opportunity within this consultation process to comment upon the areas identified in the Appendices for development.

Woodland Trust: Objects to the proposed land allocation for development at Stubbingwood Farm. This adjacent to a 6ha Ancient Semi Natural Woodland called Starth Wood. Development which is near to ancient woodland can cause damage to the woodland and so would like this allocation reconsidered.

Summarised comments from developers/agents

Landridge Homes Ltd Unclear how estimated supply of houses has been calculated. Should include unimplemented planning permissions, allocations, windfalls and SHLAA sites.

nineteen47/Richborough Estates Approach taken in preparing joint plan enabling full housing and development needs to be met within the plan area supported.

Further work required to understand full level of housing need (overall quantum/where need arises). Robust approach to ensuring sufficient sites to meet needs important. Significant weight to the extent of affordable housing need and delivery important to maximise the supply of market and affordable homes.

The plan must not place too much reliance on a single source of supply (brownfield sites/major SUEs/new settlements) which have long lead-in times, inherent delivery risks and cannot be relied upon to deliver housing in early years of the plan period, the plan must be flexible to slippage.

The land at Oxtan Road, Calverton has been assessed against the AECOM Greater Nottingham Growth Options Study criteria. It is suitable for development with no constraints identified which would prevent the immediate delivery of housing.

Savills/ Taylor Wimpey Grateful for opportunity comment and supportive of a co-ordinated approach to planning for development across Greater Nottingham but raise some concerns in respect of the consultation document. Some concerns are raised in respect of the consultation document; some of which will need to result in changes ahead of the next consultation.

Welcome the opportunity to comment on the growth options consultation but request report of consultation prior to the next round of consultation.

Supportive of the co-ordinated approach across Greater Nottingham but concerns have been raised in respect of the consultation document. Anticipate changes to the document will be needed ahead of the next consultation. A meeting is requested to discuss comments to inform the next version of the document.

It is helpful to have the opportunity to comment on the growth options consultation. However, there are many matters emerging and so currently

unknown and hence it would be useful for full reporting on responses to this consultation and the authorities' responses to be published and made available prior to the next consultation on the emerging plan. We are supportive of a co-ordinated approach to planning for development across Greater Nottingham and it is encouraging to see this early stage consultation. We would be grateful for a meeting to discuss our comments which will in part inform the next consultation version of the Greater Nottingham Strategic Plan which is currently expected to be a draft Strategic Plan published in 2021.

Stantec (formerly Peter Brett Associates) Barwood Homes The site at Hollygate Lane, Cotgrave represents an opportunity to deliver approximately 90 new homes in a sustainable location adjoining a key settlement that will deliver a range of important benefits without harming the purposes of the Green Belt. This site is deliverable in the short term and is not reliant on the provision of major new infrastructure; The site is now tightly enclosed by existing new housing development and a Memorial Woodland and its development would not therefore encroach upon the wider countryside; Rushcliffe Council's evidence base shows that the site has no overriding technical or environmental constraints and an appropriate environmental buffer can be provided alongside the Grantham Canal; and the development of the site would constitute sustainable development in one of Rushcliffe Council's identified key settlements and thereby help to meet the area's increasingly challenging development needs

William Davis Consideration will need to be given to the expected timetable for preparation of the Strategic Plan alongside the introduction of the changes proposed through the White Paper. These changes will radically alter the format and content of Local Plans.

Summarised comments from other organisations

Beeston Civic Society Asked how the adopted Broxtowe Local Plan, the carbon neutral target and the 'Planning for the Future Consultation' will be taken into account

Asked why does the Landscape Character Assessment not require a review.

Greater reference needed to heritage and Nottingham City Homes

There is reference to the Green corridor and the Trent Valley, but no specific mention of the Attenborough Nature Reserve.

The Innovation Campus associated with HS2 is believed to include 11k jobs and 5k housing, implying considerable land allocation and infrastructure on the Toton boundary of Broxtowe and Erewash. There are more general difficulties in excluding Erewash from this study.

The Chetwynd Neighbourhood Plan, mentioned in passing, has yet to be approved. Also associated policies arising out of this plan might be taken into account.

Councillor for Bingham Town Council The government's proposed changes renders the evidence not credible. Questions need for new sites.

Carlton and Gedling U3A Consultation process is inadequate. All communities should be consulted, with substantial displays in every library and council office and public meetings, were these to become possible

Nottinghamshire Campaign to Protect Rural England Questions the relationship between the Development Corporations proposed for the Toton hub and the site of Ratcliffe on Soar power station and the Greater Nottingham Strategic Plan. The new entities should be guided by the Strategic Plan as this plan is drawn up by public authorities accountable to the public.

Rushcliffe Borough Council East Leake Ward members 2011 census is significantly out of date in terms of growth of East Leake. Capacity of infrastructure is incorrect. There are school, highways and sewage issues. It is an unsustainable location for growth.

The areas of growth identified are being considered individually, but if selected in combination their impact would be greater than the sum of the parts, particularly in terms of coalescence.

Given increased working at home post COVID, ensuring good, fast and reliable broadband is essential.

Residents management companies on new estates and charges are problematic and policies should protect residents through planning conditions.

Oppose growth at R15.3, R16, and R17. It is rural good quality farmland with recreational value. It has historic villages which would be detrimentally affected by new development.

Recent rapid growth at East Leake compromises the data used in the Options for Growth Study - 2011 census data for East Leake it inaccurate due to the recent housing growth.

Statements about infrastructure capacity in the Study is likely to be out of date. seem to be well out of date.

Areas of growth identified are being considered individually. In combination impact would be greater (examples provided)

If one of the changes post COVID is increased working at home, then ensuring good, fast and reliable broadband is of paramount importance, and this may need to be included in policies.

Consideration should be given to policies that protect future residents via conditions on planning approvals re issues of charges applied by new management companies.

Rushcliffe Borough Councillor No loss of Green Belt protection should be allowed on sites R12.1, R12.2, R12.3 and R12.4. Detailed reasons why development at each of the sites should not be permitted are set out. Furthermore, consultee considers that Ruddington does not have capacity to support further development in terms of transport infrastructure and local services.

equipped2succeed and Second Chance Learning Academy Must not forget about people development when planning for strategic growth. It is important to build the capacity of people in terms of their knowledge, skills and qualifications as well as empowering, enabling and equipping people to confidently aspire, aim high and achieve. This is key to enabling people to effectively use qualifications and skills so we have thriving communities, rather than keeping some of communities impoverished and feeling they are second class.

Councillor Leo Lanzoni, Ruddington Parish Council Remove sites R12.1, R12.2, R12.3 and R12.4 from the list of Strategic sites. No loss of Green Belt should be allowed. Ruddington is a 'town' under the terms of the Green Belt coalescence aims as accepted in all previous planning policies such as the Rushcliffe Local Plan Part 2. Development on these sites would be less sustainable than sites in a new Garden Village. Stating a 'preference' for a site need to allow for an explanation as to why, i.e. they would substantially benefit from the development personally. Specific dispreferences to be noted against specific sites. Sites R12.1, R12.2, R12.3, R12.4 are not suitable for housing development for the following reasons; Ruddington is at capacity in terms of roads, NHS/health facilities, and car parking. Three sites already under construction around Ruddington and have not been taking into account. Site R12.1 should be discounted as a site for the following specific reasons; the site will conjoin with the new development of 3000 houses in Clifton which is against the objectives of the document; destruction of the natural environment at Fairham Brook Nature Reserve including the habitat of rare moth; floodplain and increased flood risk; school, tram stop and village centre all further than 1600m DoT walking distance guidance; therefore unsustainable for the environment, travel infrastructure and amenities. Site R12.3 should be discounted as a site for the following specific reasons; the conglomeration of Ruddington, Edwalton and Tollerton over Green Belt land; the document has not considered the new development at Flawforth Lane; additional facilities required but no space for them; additional housing unsustainable for Ruddington; schools, tram stop and village centre all further than 1600m DoT walking distance guidance; and destroy a significant portion of

Green Belt land. Site R12.4 should be discounted as a site for the following specific reasons; the conglomeration of Ruddington and Bradmore which is against the primary objectives of the document; the document has not considered the new development at Flawforth Lane; schools, tram stop and village centre all further than 1600m DoT walking distance guidance; borders Rushcliffe Country Park and building works/pollution would in the long-term

disrupt eco environment of the area; and would destroy a significant portion of Green Belt.

Tollerton Against Backdoor Urbanisation (TABU) Object to further development of Tollerton. Further development should be avoided in areas that already have large housing allocations. It is very important to take into account Neighbourhood Plans.

Summarised comments from local residents

General Comments from residents/individuals:

- The negotiations on the planning principles by developers should not be allowed on economic grounds.
- Growth options based on flawed/incomplete evidence base
- Impact to Green Belt
- Not invited to put forward site to be included in Appendix 2.
- Wish to see consent granted for land at Melton Road, Stanton on the Wolds, for 20 dwellings (site in 2017 SHLAA and has permission for 1 dwelling)
- It is simply not possible to redesigned villages such as Ruddington
- Protection of all agricultural land and wildlife habitats must be preserved as a priority
- Figures given in App 1 seem to indicate that there is sufficient housing supply already identified to 2038, and that further areas to develop are not required.
- It would seem sensible (and more cost effective) to build new homes and places of work near to motorways, the A46, A1, HS2 rail, NET (tram) etc.
- The areas of natural beauty and woodland must be protected for future generations as in short supply.
- The countryside along the A614/A60 corridors must be protected, due to potential impact on tourism linked to Robin Hood and proximity to Centre Parcs and the Major Oak.
- Support concept of an accessible new market town and associated infrastructure.
- Health and Education should have a higher priority throughout this document.
- Planning and development should be holistic and strategic, rather than isolated and piecemeal
- The focus of southwest Rushcliffe tends to be southwards. Developments in these parts are as likely to become, in substance, additions to Greater Loughborough.
- The photos included on the documents are of open areas that have no proposed developments.
- Tram extension proposal would be costly and not necessary.

- Nottingham City should not lead this joint plan owing to mismanagement of Robin Hood Energy and as they do not represent the boroughs.
- River transport is impractical.
- Development up to 2028 has been fully addressed in current Local Plans and any additional development should relate only to the period 2028-2038.

Resident/Individual consultation comments regarding consultation exercise

- Inadequate advertising of the consultation.
- concerned people won't have the bandwidth to respond to this consultation given the circumstances. Why is the consultation being started during Covid and semi lockdown?
- Expecting consultees to fill in and email potentially 54 forms to answer 54 questions is neither easy nor a good use of time
- Feedback doesn't neatly fall into questions. Questions don't cover all feedback.
- The form was not user friendly; unable to copy and paste, i.e. to be able to share comments between members of a group. This is a basic error for such an important document. All comments should be grouped into one e-mail rather than sent individually.
- The plans should wait - as the report is measuring working and living habits by pre-COVID standards.
- The city centre could many, which could be ideal conversions for students and first time buyers.
- With home working from home going forward, easy transport links might well be an old barometer of where is best to plan new housing - as standards of living will not necessarily resemble the report compiled.

The following sections contain summaries relating to specific sites. The majority of comments were submitted in response to questions within Chapter 2: Overall Strategy or Chapter 10: Any Other Issues.

Site Specific Comments: Broxtowe

1. B01 Brinsley Extension

Summarised comments from statutory organisations

Amber Valley Borough Council considers that the sites submitted for consideration within area B01 would not have any material impact on Amber Valley.

Summarised comments from developers

Barratt David Wilson Homes supports development at site B01.1 for reasons including that it is a logical extension of the site to the north which is allocated in Broxtowe's Part 2 Local Plan

Summarised comments from local residents

Two local residents oppose development at site B01.1 because of impact on a nearby nature reserve.

2. B02 Eastwood Extension

Summarised comments from statutory organisations

Amber Valley Borough Council considers that the sites submitted for consideration within area B02 would not have any material impact on Amber Valley.

Summarised comments from developers

Mr C Nott supports development at site B02.2 for reasons including that it is enclosed by the existing road network and there are employment opportunities in immediate proximity.

Persimmon Homes supports development at site B02.2 as it is 'good strategic urban extension opportunity'.

Summarised comments from other organisations

Nottinghamshire Campaign to Protect Rural England opposes development at site B02.2 'due to one or more of the following factors': local amenity value; landscape value and sensitivity; risk of coalescence; 'a Green

Belt or remote location'; and remoteness from services and sustainable travel options.

Summarised comments from local residents

Two local residents support development at sites B02.1 and B02.2 as they would be 'logical infill developments' and well connected to the local road network.

Two other residents support development at area B02 (particular sites are not referred to) because it 'does not involve building on greenbelt'. One of these residents also supports it because it is 'near City/employment or tram stops'; the other because it does 'not add to traffic congestion on roads such as A52 since near tram'.

3. B03 Northwest of Bulwell

Summarised comments from statutory organisations

Aslockton Parish Council supports development at sites 'close to the City of Nottingham and its suburbs' (although particular sites/areas are not referred to).

Summarised comments from local residents

Two local residents oppose development at site B03.1 as it would represent urban sprawl into the Green Belt, unless the site was 'extended to the south'.

4. B04 Watnall Extension

Summarised comments from developers

Knights support development at site B.04.1 for reasons including that it would maintain the physical separation of built-up areas, is well contained by physical features, would provide a mix of uses, is highly accessible and would help sustain nearby businesses.

Summarised comments from local residents

Two local residents oppose development at site B04.1 because it would be isolated from the rest of Kimberley and because of concerns about air quality, unless it was developed as a 'self-contained eco-village'.

Two other residents support development at area B04 (particular sites are not referred to) because it 'does not involve building on greenbelt'. One of these residents also supports it because it is 'near City/employment or tram

stops'; the other because it does 'not add to traffic congestion on roads such as A52 since near tram'.

5. **B05 Nuthall Extension**

Summarised comments from statutory organisations

Aslockton Parish Council supports development at sites 'close to the City of Nottingham and its suburbs' (although particular sites/areas are not referred to).

Summarised comments from developers

Gaintame supports development at site B05.2 for employment purposes for reasons including having excellent access to the M1 and A6002, being only a short journey from Toton and representing a 'logical extension to the Broxtowe urban area'.

Wilson Bowden Developments supports development on land at New Farm Nuthall (which is not a site specified at Appendix 2) for employment purposes for reasons including it being served by regular bus services and 'the history of Green Belt releases to meet identified needs in this location'.

Summarised comments from other organisations

Tollerton Against Backdoor Urbanisation (TABU) supports development at (unspecified) areas at Nuthall because of good transport infrastructure.

Summarised comments from local residents

Two local residents oppose development at sites B05.1 and B05.2 because of air quality concerns due to the location close to the M1, A610 and A6002.

6. **B06 Awsworth Extension**

Summarised comments from developers

Hall Construction Services supports development on land east of Awsworth (which is not a site specified at Appendix 2) for reasons including that it has good public transport, good access to the M1 and would not harm the purposes of Green Belt.

7. **B07 North of Trowell**

Summarised comments from developers

Strawsons Group Investments supports development at parts of site B07.1 for reasons including that it 'can be effectively contained within the landscape and defensible boundaries', 'relates well to an existing settlement' and is not heavily dependent on major infrastructure.

Summarised comments from other organisations

Tollerton Against Backdoor Urbanisation (TABU) supports development at (unspecified) areas at Trowell because of good transport infrastructure.

Summarised comments from local residents

Two local residents support development at sites B07.1, B07.2 and B07.3, despite reservations about air quality, as they could be developed as a 'self-contained eco-village'.

8. B08 Land off Woodhouse Way

Summarised comments from statutory organisations

Aslockton Parish Council supports development at sites 'close to the City of Nottingham and its suburbs' (although particular sites/areas are not referred to).

Calverton Parish Council supports development at sites B08.1, B08.2, B08.3, B08.4 and B08.7 for reasons including that they are 'urban extensions', have good current and future transport infrastructure and have high levels of employment provision.

Summarised comments from developers

Barratt David Wilson Homes supports development at site B08.5 (which is in Nottingham City) for reasons including that it is a logical extension to an existing major residential scheme adjoining the Nottingham Business Park.

Gaintame supports development at site B08.6 for employment purposes for reasons including having excellent access to the M1 and A6002, being only a short journey from Toton and representing a 'logical extension to the Broxtowe urban area'.

Parker Strategic Land supports development at sites B08.1, B08.2, B08.3, B08.4 (excluding the Scheduled Monument) and B08.7 for reasons including that it provides an opportunity for 'strategic scale growth', has good public transport options, has the potential for strong local green and blue infrastructure connections, has facilities nearby, and does not fulfill Green Belt objectives.

Trustees for the Estate of Mrs Joan Winifred Briggs supports development at site B08.3 for reasons including that it does not fulfill the purposes of Green Belt; however, the site should be extended to the south to include land at Chantry House.

Wilson Bowden Developments supports development at site B08.6 for employment purposes, in particular for businesses being displaced at Nottingham Business Park by HS2, for reasons including excellent access to the M1 and A52 and only a short journey from Toton. It also supports development at site B08.5 (which is in Nottingham City) for reasons including that it would form a logical extension to the existing residential area and is accessible by sustainable modes of transport.

Summarised comments from other organisations

Nottinghamshire Campaign to Protect Rural England opposes development at sites B08.1, B08.2, B08.3, B08.4 and B08.7 'due to one or more of the following factors': local amenity value; landscape value and sensitivity; risk of coalescence; 'a Green Belt or remote location'; and remoteness from services and sustainable travel options.

Summarised comments from local residents

One local resident supports development at sites B08.1, B08.2, B08.3, B08.4 and B08.7 as they would constitute extensions to the existing urban area. Two other residents support development at area B08 (particular sites are not referred to) because it 'does not involve building on greenbelt'. One of these residents also supports it because it is 'near City/employment or tram stops'; the other because it does 'not add to traffic congestion on roads such as A52 since near tram'.

Two local residents oppose development at these sites because of a need to preserve 'this thin strip of green land between the M1 and edge of Nottingham'. They also oppose development at site B08.6 because of air quality concerns due to the location close to the M1, A610 and A6002 (The residents refer to site 'B06.6', however it is understood that they have in mind site B08.6.)

9. **B09 Northeast of Toton**

Summarised comments from statutory organisations

Aslockton Parish Council supports development at 'sites close to HS2 hub at Toton' (although particular sites/areas are not referred to).

Calverton Parish Council supports development at sites B09.1 and B09.2 for reasons including that they are 'urban extensions', have good current and future transport infrastructure and have high levels of employment provision.

Chetwynd: The Toton and Chilwell Neighbourhood Forum supports development at site B09.2 for reasons including that it would provide the means for a new link road from the Chetwynd Barracks development to the A52 and the proposed Toton link road, and that it would provide opportunities for links of various kinds to surrounding areas.

Homes England and the Defence Infrastructure Organisation, with regard to sites B09.1 and B09.2, comment that 'priority [should be] given to ensuring delivery of sites that have already been allocated in Local Plans', such as Chetwynd Barracks.

Radcliffe on Trent Parish Council supports development at area B09 (particular sites are not referred to) because it is 'close to the regeneration site of Ratcliffe Power Station'.

Summarised comments from developers

Bloor Homes Midlands supports mixed use development at site B09.2 for reasons including: good access to public transport, services and facilities; the site being 'within the main built-up area of Nottingham and will therefore not lead to encroachment of development or sprawl'; and the HS2 Hub Station plans representing an 'unrivalled' opportunity to deliver 'sustainable' development.

Oxalis Planning supports development at parts of site B09.1 for reasons including that it has excellent public transport, is well related to the urban area and could integrate with development to the east of Toton Lane

Stone Planning Services has no objection to development at site B09.2 but considers that the site should be extended to include the Japanese Water Gardens and Bardills Garden Centre, as these are brownfield sites which do not serve Green Belt purposes.

University of Nottingham, with regard to site B09.2, comments that the site should include land west of Bramcote, north-east of B09.2, which is 'well positioned to deliver sustainable development'.

Summarised comments from other organisations

Nottinghamshire Campaign to Protect Rural England opposes development at sites B09.1 and B09.2 'due to one or more of the following factors': local amenity value; landscape value and sensitivity; risk of coalescence; 'a Green Belt or remote location'; and remoteness from services and sustainable travel options.

Tollerton Against Backdoor Urbanisation (TABU) supports development at (unspecified) areas at Toton because of good transport infrastructure.

Stapleford Town Council opposes development at site B09.1 because it is existing Green Belt.

Summarised comments from local residents

One local resident supports development at sites B09.1 and B09.2 as they would constitute extensions to the existing urban area. Another resident supports development at these sites because it would 'minimise the impact on climate change and efforts to achieve carbon neutrality'. Two further

residents support development at area B09 (particular sites are not referred to) because it 'does not involve building in greenbelt'. One of these residents also supports it because it is 'near City/employment or tram stops'; the other because it does 'not add to traffic congestion on roads such as A52 since near tram'.

Two local residents support development at site B09.1 as it would be 'infill development', however they have reservations about air quality. They oppose development at site B09.2 as it would 'effectively join up Stapleford and Bramcote' and because of concerns about air quality due to the proximity of the A52.

Site Specific Comments: Gedling

1. G01 Ravenshead Extension (General Comments)

Summarised comments from statutory organisations:-

Papplewick Parish Council considered that with the paucity of public transport to G01, the southern section of G01 would result in increased traffic through the Papplewick village as it would rely principally on the use of the A60 for N-S access and the B6011/B683 for E-W access to the M1 and the western suburbs of Nottingham.

Ravenshead Parish Council did not support further allocations in G01. They support the broad areas of search that focus on sustainable urban extensions rather than increasing allocations in main settlements.

Summarised comments from developers:-

Development of the land at Silverland Farm (both sites) to the north of Ravenshead is fully supported by **Mr Voce** who is the landowner of the sites.

Summarised comments from other organisations:-

No comments.

Summarised comments from local residents:-

One resident stated the areas with the best connections, including G01, are best to develop first.

One resident stated G01 is preferred because it leaves a gap between the city and the development i.e. the city is buffered from these developments and urban sprawl is avoided.

Two residents stated G01 would present opportunities to create eco-villages, with good infrastructure connections possible by rail.

One resident stated G01 is not preferred as this growth option is highly location sensitive. The expansion of existing settlements to a point at which their character is lost, as well as significant highly prized green belt, is definitely not preferred.

One resident stated these are relatively small rural developments however their impact on the village of Ravenshead would have to be considered. Unless there is sufficient infrastructure for health and education, facilities could be overloaded. Travel to Nottingham would involve the A60 and lead to considerable congestion.

One resident stated G01 is an unsustainable settlement.

G01.1 Silverland Farm, Ricket Lane Site A

Nottinghamshire County Council, as the minerals and waste planning authority, stated the eastern part of this site is an historic landfill site called Rickett Lane Tip (ceased in 1982). If this site was to progress further they recommend that further advice be sought from the EA and the County Councils Landscape and Regeneration Team to understand what site investigation may be required as well as engineering measures that may be needed to manage the risk of possible site settlement and/or landfill gas emissions.

Nottinghamshire Wildlife Trust objected to the site. PPSPA – in close proximity to Natural England Core Areas for birds. Major intrusion into the wider countryside.

G01.2 Silverland Farm, Ricket Lane Site B

Nottinghamshire County Council, as the minerals and waste planning authority, stated there are no mineral or waste issues in terms of safeguarding at this time.

Nottinghamshire Wildlife Trust objected to the site. PPSPA – in close proximity to Natural England Core Areas for birds. Major intrusion into the wider countryside.

G01: New sites

D2H Land Planning Development Ltd promoted their site “West of Kighill Farm” to the south of Ravenshead.

Woolbro Morris promoted their site “Land at Cornwater” to the south of Ravenshead.

2. **G02 Newstead Extension (General Comments)**

Summarised comments from statutory organisations:

Nottinghamshire County Council, as the minerals and waste planning authority, stated there are no mineral or waste issues in terms of safeguarding at this time.

Ravenshead Parish Council did not support further allocations in G02. They support the broad areas of search that focus on sustainable urban extensions rather than increasing allocations in main settlements.

Summarised comments from developers:

No comments.

Summarised comments from other organisations:

Councillor Ellwood stated G02 seems reasonable as it has good transport links via the Robin Hood Railway Line for Newstead.

Summarised comments from local residents:-

One resident stated the areas with the best connections, including G02, are best to develop first.

One resident stated G02 is preferred as it will connect areas and benefit local shops and it will make it easier for emergency services and other services. Gedling is the most disadvantaged as it is not on a major road route (M1, A453, A610 or A46), no strong rail links and the borough is mainly used as a commuter area and thus produces a population that works in the factories, offices and hospitals around Nottingham. Gedling should focus residential development on sites including G02.

Three residents stated G02 is preferred because it is serviced by the NET tram or extension to tram network, involves minimising car journeys to major employers and schools in the area and is not bordering edge of highways.

One resident stated G02 is not preferred as development on site would encroach on Hollinwell golf course and Newstead Abbey.

One resident stated G02 is non strategic.

3. **G03 North of Hucknall (General comments)**

Summarised comments from statutory organisations:-

Linby Parish Council stated current infrastructure is insufficient to support the existing strategic site in the Aligned Core Strategy and therefore it is equally insufficient for any additional site allocations. Linby Parish Council has already taken a significant level of additional growth through other sites in the past five years and this has overwhelmed local infrastructure. They also stated the development of existing Green Belt land or safeguarded land should not be prioritised for new development because the AECOM document shows there is land identified “well above the requirements for development land for the coming plan period to meet housing and employment need”. This is an evidence-based opportunity to update the Green Belt boundary and place the Top Wighay Farm safeguarded land (i.e. sites G03.1 and G03.2) back into the Green Belt.

Ravenshead Parish Council did not support further allocations in G03. They support the broad areas of search that focus on sustainable urban extensions rather than increasing allocations at main settlements.

Severn Trent stated if significant growth is allocated in the north west of Nottingham towards Hucknall then there is potential for significant

improvements to be required. They would like to work with the Councils to understand the scale and programme of development so that they can support the delivery of infrastructure within the appropriate timeframe.

Summarised comments from developers:-

Development of the land at Top Wighay Farm (both sites) to the north of Hucknall is supported by **Nottinghamshire County Council and Hallam Land Management** who are the landowners. An illustrative masterplan shows that the proposed development on the safeguarded land would deliver a minimum of 900 homes. In addition, the strategic site would provide a local centre, employment development, a new primary school and significant green infrastructure. A planning application for the current strategic site was submitted in January 2020 and is pending consideration by Gedling Borough Council. A separate application made to Nottinghamshire County Council in relation to two new access junctions at the A611 to provide access into the Top Wighay Farm site (ref. FR3/4054) was approved in January 2020 and work to deliver the highway infrastructure has now commenced. Site investigation work is being undertaken to support the strategic growth at Top Wighay Farm demonstrates there are no technical reasons preventing the site from being brought forward for development. The required infrastructure to support development at the 'safeguarded land' at Top Wighay Farm has been considered as part of the development proposals in the current planning application. The development proposals in relation to the current planning application have been carefully designed to ensure that the potential future development of the safeguarded land is not prejudiced. The highways infrastructure work has been supported by £8.8m of funding from Homes England and D2N2 to frontload the key infrastructure required to serve future development of the Top Wighay Farm site. A future NET tram extension route is safeguarded to allow for a sustainable transport option. The drainage infrastructure has suitable capacity to be used by the wider site and the primary school has been designed to be "future proofed" to accommodate the additional pupils generated by the wider development. There are no technical reasons to prevent the delivery of this strategic site.

Aldergate considered that the Plan Area should include Hucknall or provide for this part of Ashfield to fulfil its role in meeting the needs of the remainder of the Core Area. Figure 1.1 should be revised to include the Hucknall part of Ashfield or an indication should be given to Ashfield as to the number of houses it is to provide within the Hucknall area.

Hammond Farms and **Langridge Homes Ltd** had concerns about sites G03.1 and G03.2. The land was first allocated in the 2005's Gedling Replacement Local Plan for development in the period to 2011. However, the site has failed to come forward for development and should not be considered for further development up to 2038 and that alternative locations be found in Gedling to replace the existing allocation. There are many problems involved in bringing this site forward including the high costs of upfront infrastructure and also environmental issues. The Top Wighay site was also opposed by Ashfield Borough Council due to the capacity of Hucknall to cope with significant growth on land adjoining its northern

boundary. The bulk of Gedling's population live in Arnold and Carlton and this is where more homes are needed.

Summarised comments from other organisations:-

Councillor Ellwood stated G03 seems reasonable as it has good transport links via the Robin Hood Railway Line for Hucknall.

Summarised comments from local residents:-

One resident stated Gedling should concentrate around Hucknall and G03 is preferred because it will connect areas and benefit local shops and it will make it easier for emergency services and other services. Gedling is the most disadvantaged as it is not on a major road route (M1, A453, A610 or A46), no strong rail links and the borough is mainly used as a commuter area and thus produces a population that works in the factories, offices and hospitals around Nottingham. Gedling should focus on residential development on sites including G03.

One resident stated the areas with the best connections, including G03, are best to develop first.

One resident stated the obvious priorities for development would be broad areas, including G03, along the current and proposed tram routes.

One resident stated development should be concentrated along the current and proposed tram routes, with extensions as appropriate, on the northern and western tram corridors (i.e. the Beeston-Stapleford tram line, the A453 Clifton/Gotham tram line and the Nottingham to Top Wighay tram line).

One resident stated both these sites are close to the Nottingham Express tram system and therefore are likely to have good access into Nottingham. They may therefore be suitable for development.

One resident states that G03 is close to established transport routes and would help provide a flexible workforce and is near existing business parks reducing travel if required.

Three residents stated G03 is preferred because site is serviced by the NET tram or extension to tram network, site involves minimising car journeys to major employers and schools in the area and site not bordering edge of highways. Urban extension is preferred option as G03 is one of the sites that does not involve building on Green Belt land and is near city/employment or tram stops.

One resident stated G03 is not preferred due to the development encroaching on Hollinwell golf course and Newstead Abbey.

One resident stated although sites G03.1 and G03.2 are safeguarded land and have precedence over any Green Belt release the scope for a large

extension to the existing strategic allocation is limited due to the safeguarded land being dependent on access from the existing allocation and also the allocation is unlikely to start delivering 845 homes until 2023 or be completed until at least 2033 only leaves the prospect of a limited additional dwelling allocation in this area.

G03.1 Top Wighay Farm east

Nottinghamshire County Council, as the minerals and waste planning authority, stated there are no mineral or waste issues in terms of safeguarding at this time.

Nottinghamshire Wildlife Trust stated there would be impacts on the following Local Wildlife Sites (Top Wighay Farm Drive, Top Wighay Road Grassland and Joes Wood). They refer to the need to consider cumulative impacts with adjacent existing core strategy strategic site. Major intrusion into the wider countryside.

One resident stated G03.1 is preferred due to existing development and transport links.

G03.2 Top Wighay Farm north

Nottinghamshire County Council, as the minerals and waste planning authority, stated there are no mineral or waste issues in terms of safeguarding at this time.

Nottinghamshire Wildlife Trust stated there would be impacts on the following Local Wildlife Sites (Top Wighay Farm Drive, Top Wighay Road Grassland and Joes Wood). They refer to the need to consider cumulative impacts with adjacent existing strategic site in the Aligned Core Strategy. Major intrusion into the wider countryside.

Councillor Ellwood stated G03.2 is already being built as an existing development within the Local Plan.

GO3: New sites

A landowner promoted their site “Land at Hayden Lane” to the north of Hucknall.

4. **G04 North of Burntstump Hill (General Comments)**

Summarised comments from statutory organisations:-

Papplewick Parish Council considered the paucity of public transport to G04 would result in increased traffic through the Papplewick village as it would rely on the use of the A60 for N-S access and the B6011/B683 for E-W access to the M1 and the western suburbs of Nottingham.

Ravenshead Parish Council did not support further allocations in G04. They support broad areas of search that focus on sustainable urban extensions rather than increasing allocations to what are defined as main settlements.

Summarised comments from developers:-

Development of the “Land at Forest Farm, Papplewick” (i.e. the G04.1 site) is fully supported by **Mr Stubbs and Mr Whittington** who are the landowners of the site. It should be noted that the site area that they are promoting is now larger than the one shown on Appendix 2 of the Growth Options document and now includes the land south of the disused railway line.

Summarised comments from other organisations:-

Councillor Ellwood stated the northern part of Gedling covers large parts of the Green Belt and if G04 and other sites G05.2, G06.3 and G07.1 are all built then the Green Belt in Gedling would be subdivided. It makes sense to have a well-defined boundary for the Green Belt so care should be taken to avoid developing all these sites.

Summarised comments from local residents:-

One resident stated the areas with the best connections, including G04, are best to develop first.

One resident stated G04 is preferred because it leaves a gap between the city and the development i.e. the city is buffered from these developments and an urban sprawl is avoided.

One resident stated G04.1 is not preferred as it would have an impact on Burntstump Country Park.

One resident stated G04 is unsuitable Green Belt site.

G04.1 North of Burntstump Hill, Mansfield Road

Nottinghamshire Campaign to Protect Rural England stated that G04.1 is unsuitable for development due to one or more of the following factors: local amenity value; landscape value and sensitivity; risk of coalescence; a Green Belt or remote location, which if developed would make brownfield development and regeneration of urban areas more difficult; remoteness from services and sustainable travel options (no safe walking or cycling and poor or now public transport and little prospect of better PT provision).

Nottinghamshire County Council, as the minerals and waste planning authority, stated the site area north of the railway line lies immediately to the South of the permitted Bestwood II quarry which extracts and processes Sherwood Sandstone. The quarry has recently gained permission for an

Eastern extension and the emerging Minerals Local Plan (Publication Version, August 2019) allocates a further Northern extension to the quarry under Policy MP3d. As outlined in the delivery schedule if the northern extension were to be permitted, extraction is expected to continue until 2035. If this site was to progress further within the Greater Nottingham Strategic Plan, the County Council would seek to be involved within this process and discuss further the detail of this site and potential mitigations that could be put in place along the northern boundary of the proposed site to prevent the mineral and the quarry operation itself being sterilised. It is also recommended that the operator, Tarmac, are involved within these discussions and throughout the consultation process.

Nottinghamshire Wildlife Trust objected to the site. Impacts on the following Local Wildlife Sites (Longdale Plantation, Longdale Heath, Longdale Lane Plantation and Seven Mile Railway). PPSPA – adjacent to IBA and Natural England Core Areas for birds. The site is within Blidworth to Calverton Biodiversity Opportunity Map (BOM) Focal Area. Major intrusion into the wider countryside.

One resident stated G04.1 is not preferred as the road traffic generated would be considerable and would lead to serious congestion on the A60/A616 routes into Nottingham. The site is in a rural location with no infrastructure in place. It would need health facilities, schools, shops, village hall etc. It is adjacent to the A60, a main route into Nottingham, which could be advantageous.

5. **G05 Bestwood Village / Redhill Extension(s) (General Comments)**

Summarised comments from statutory organisations:-

Papplewick Parish Council considered the paucity of public transport to the G05, the northern and western parts of G05 would result in increased traffic through the Papplewick village as it would rely principally on the use of the A60 for N-S access and the B6011/B683 for E-W access to the M1 and the western suburbs of Nottingham.

Ravenshead Parish Council did not support further allocations in G05. They support broad areas of search that focus on sustainable urban extensions rather than increasing allocations to what are defined as main settlements.

St Albans Parish Council had concerns about the erosion of the Green Belt and impact on wildlife in the area, implication for flooding in the area and encroachment of Bestwood County Park. Development should be in urban areas with redevelopment on brownfield land. The road infrastructure around the development is completely inadequate to support the increased amount of traffic that the new development would generate, as traffic would be prevalently directed south and east towards the centres of Nottingham and Gedling. There is no alternative than to channel this traffic toward the

A60 or towards the residential Bestwood Lodge Drive. The A60 is a narrow funnel that cannot be widened and Bestwood Lodge Drive is a residential road totally unsuitable for high traffic and with the only exit towards Queen Bowers Road/Oxclose Lane (B6004). These two directives are already busy and adding traffic would lead to gridlocks at rush time.

Summarised comments from developers:-

Development of G05.1 and G05.2 is fully supported by **Trinity College** who are the landowner of the site. Opportunities for the provision of infrastructure needs could be made on site including new schools, health care provision and retail units as well as provision for employment uses. Land safeguarded in the Aligned Core Strategy for a new park and ride facility for the north of Nottingham is located within the boundary of the site and Nottinghamshire County Council are actively progressing plans for this facility.

Hammond Farms and **Langridge Homes Ltd** had concerns about the disparities between the conclusions of the SHLAA and the Growth Options study for sites G05.1 and G05.2. Gedling's 2019 SHLAA concluded that the site (ref 6/1130) is not deliverable and not developable whilst the AECOM growth options study concluded that it represents a potential area for strategic growth. Langridge Homes Ltd had previously investigated bringing land at New Farm, Redhill forward for development but concluded that there are too many constraints to overcome including topography, landscape and visual appearance, surface water drainage strategy, the barrier to development imposed by a high pressure national gas pipeline. It is not a site which lends itself to piecemeal development and a such upfront infrastructure costs would be extremely high and impact on scheme viability.

Summarised comments from other organisations:-

Councillor Ellwood stated the northern part of Gedling covers large parts of the Green Belt and if G05.2 and other sites G04, G06.3 and G07.1 are all built then the Green Belt in Gedling would be subdivided. It makes sense to have a well-defined boundary for the Green Belt so care should be taken to avoid developing all these sites.

Councillor King questioned the benefits of the proposed park and ride site for Arnold residents as they are most likely to continue with their habitual pattern by driving to the Forest Park and Ride site which meant the best access road for Bestwood Lodge Drive would be the existing A60 Mansfield Road with very little increase in traffic.

Councillor Payne had concerns about the further pressure on local public services and infrastructure in and around the Redhill and Arnold areas if future housing growth were to be pursued in G05.1, G05.2 and other site G07.1. Any additional housing growth would add further pressure and congestion on the A60 Mansfield Road from Leapool Roundabout in Redhill through the urban area of Redhill and onwards towards Daybrook Square. Development at G05.1 and G05.2 would alter the character of the area

currently surrounding Bestwood Country Park and significantly increase vehicular traffic on Bestwood Lodge Drive – giving rise to safety concerns, the loss of idyllic countryside and adding further congestion at the already busy traffic junctions on Queens Bower Road and Oxclose Lane. Nottinghamshire County Council has not consulted regarding any concept for an access road from the proposed Park & Ride to Bestwood Lodge Drive. The areas around Bestwood Lodge Drive and Thornton Avenue/Mansfield Road/Springfield Road have suffered from flooding on a number of occasions in recent history and continue to be areas of concern for the agencies responsible for flood risk management. It would be an unforgivable mistake to pursue any option for housing growth that further exacerbated the known problems with potential flooding in these areas.

Summarised comments from local residents:-

One resident stated G05 is connected to the existing urban area and is a practical location for further development provided high standards of design are used.

One resident stated the areas with the best connections, including G05, are best to develop first.

One resident stated the obvious priorities for development would be broad areas, including G05, along the current and proposed tram routes.

One resident stated G05 is preferred as it will connect areas and benefit local shops and it will make it easier for emergency services and other services. Gedling is the most disadvantaged as it is not on a major road route (M1, A453, A610 or A46), no strong rail links and the borough is mainly used as a commuter area and thus produces a population that works in the factories, offices and hospitals around Nottingham. Gedling should focus residential development on sites including G05. G05 could become an employment space with surrounding areas being residential making use of the link from Nottingham to Mansfield.

Three residents stated G05 is preferred because it is serviced by the NET tram or extension to tram network, site involves minimising car journeys to major employers and schools in the area and site not bordering edge of highways. Urban extension is preferred option as G05 is one of the sites that do not involve building on Green Belt land and are near city/employment or tram stops.

One resident stated their concern on the impact of G05.1, G05.2 and other site G07.1. This is a large loss of Green Belt land and impact to the Redhill area would be affected by any large scale development, from infrastructure strain to increased population and transportation links. Proposed tram extension does not give any direct benefit to Redhill area and the proposed Park & Ride at Redhill is unlikely to resolve traffic flows. Green Belt land was developed to prevent the spread / sprawl of large built up areas and development of G05.1 and G05.2 could eventually lead to sprawl of areas from Bestwood into Redhill. Details of how this would be managed and

prevented should be included. Additional resources and infrastructure projects should be included in any development plans.

One resident had concerns over the Green Belt, countryside and impact on wildlife. There is a huge farm operation on site which employs many people. The A60 Mansfield road has been recorded as being one of the most busy roads in the County. Need to consider long-term impact of coronavirus as work patterns and how people shop changed. This plan needs to consider how people will start using their home and local areas. Questioned the demand for housing for G05 area.

Two residents stated there are several other identified sites preferred including Bestwood Village Country Park as these currently have the supporting infrastructure in place.

G05.1 Land to the west of the A60, Redhill

Nottinghamshire County Council, as the minerals and waste planning authority, stated there are no mineral or waste issues in terms of safeguarding at this time.

Nottinghamshire Wildlife Trust objected to the site. Impacts on adjacent Bestwood Country Park and on numerous Local Wildlife Sites (Raceground Hill, Bestwood Sand Quarry, Bestwood Country Park, Bestwood Parkside Grasslands). PPSPA – close to IBA and Natural England Core Areas for birds. The site is within Blidworth to Calverton Biodiversity Opportunity Map (BOM) Focal Area. Major intrusion into the wider countryside with potential significant loss of S41 Priority Habitats.

Councillor Ellwood stated G05.1 would be a logical extension to the existing urban conurbation as the site is surrounded by urban land.

One resident stated G05.1 is not preferred as the road traffic generated would be considerable and would lead to serious congestion on the A60/A616 routes into Nottingham. This is a smaller site and although it is close to the A60 it would seem to be more suitable for development.

One resident stated G05.1 is preferred due to infill development.

One resident stated G05.1 is potentially suitable however access, landscape, heritage and flooding issues.

G05.2 Land to the north of Bestwood Lodge Drive

Nottinghamshire Campaign to Protect Rural England stated that G05.2 is unsuitable for development due to one or more of the following factors: local amenity value; landscape value and sensitivity; risk of coalescence; a Green Belt or remote location, which if developed would make brownfield development and regeneration of urban areas more difficult; remoteness from services and sustainable travel options (no safe walking or cycling and poor or now public transport and little prospect of better PT provision).

Nottinghamshire County Council, as the minerals and waste planning authority, stated there are no mineral or waste issues in terms of safeguarding at this time.

Councillor King had concerns about safety issues outside Arnbrook School, where parents park along Bestwood Lodge Drive as the proposals would cause a large increase in traffic. Three years ago, Gedling Homes replaced some garage blocks with housing which has resulted in the loss of parking spaces and more on-street parking on Bestwood Lodge Drive. Bestwood Lodge Drive is already used as a “rat run” in both directions and any further increase in traffic will exacerbate the situation. The narrowing of the footpaths will create a safety hazard and also increase unacceptable traffic noise to residents along Bestwood Lodge Drive. Bestwood Lodge Drive has problems with flooding during heavy rainfall, particularly in the area where the road widening and intersection to the access road is proposed. The proposed route, over a field, would remove natural “soak away” of water and excess water would flow down to Bestwood Lodge Drive and increase the risks of flooding. An increase in flooding would have severe implications on local housing, including those owned by Gedling Homes. The proposed route would be detrimental to essential green field land and wildlife.

One resident stated G05.2 is not preferred because the site is the size of a new township and covers areas of the countryside currently accessible to many residents of North Nottinghamshire. It would appear to be an area of historic interest with Gaunt's Hill and sections of ancient forest close by. A huge housing estate will undermine this area of countryside currently available to residents of nearby Bestwood, Redhill and Hucknall.

One resident stated G05.2 fails predominantly on landscape and purposes of Green Belt when going any further north than New Farm itself confirmed by Gedling’s 2015 Green Belt review. Also clearly access/traffic issues despite a planned Park and Ride at Leapool island.

G05.3 Land at Westhouse Farm, Bestwood Village

Nottinghamshire County Council, as the minerals and waste planning authority, stated there are no mineral or waste issues in terms of safeguarding at this time.

Nottinghamshire Wildlife Trust stated the site is within the River Leen Catchment Biodiversity Opportunity Map (BOM) Focal Area.

One resident stated this would seem to be an area suitable for development because it is a relatively small site close to leisure facilities and close to the Nottingham Express tram line for access into Nottingham.

One resident stated that Moor Road is not suitable for further housing development as traffic is already difficult for residents in Bestwood Village and additional housing will exacerbate this. There is a lack of facilities for such a growth in population.

One resident stated G05.3 is unsustainable settlement, only half safeguarded land and none strategic.

G05.4 Broad Valley Farm, Park Road

No comments.

6. **G06 Calverton Extension (General Comments)**

Summarised comments from statutory organisations:-

Papplewick Parish Council note that developing G06 might provide the means for a relieving road parallel to the B6011 however it would result in the increased suburbanisation of their rural community.

Ravenshead Parish Council did not support further allocations in G06. They support the broad areas of search that focus on sustainable urban extensions rather than increasing allocations to what are defined as main settlements.

Summarised comments from developers:-

Development of the land off Oxton Road (i.e. the G06.1 site) is fully supported jointly by **Richborough Estates, Northern Trust and Persimmon Homes**. They state the land off Oxton Road is considered preferable to either Ramsdale Park Golf Centre Site A or Site B (i.e. sites G06.2 and G06.3) within the wider Calverton Extension broad area of search.

Persimmon Homes stated G06.1 was released from the Green Belt as part of Gedling Borough's Part 2 Local Plan. The balance of safeguarded land should therefore be allocated in the GNSP to facilitate the continued expansion of Calverton. The release of safeguarded land should therefore take priority over allocating new Green Belt or non-Greenbelt land as the principal of development has already been accepted.

Development of the land at both Ramsdale Park Golf Centre Site A and Site B (i.e. sites G06.2 and G06.3) is fully supported by **Burhill Group Limited**. **Langridge Homes Ltd** had concerns about sites G06.1 and G06.2. These sites do not adjoin the built-up area of Calverton and the SHLAA has concluded that these sites are not developable. Instead the growth option should be replaced by land immediately adjoining the built-up area of Calverton to the west between main Street and Georges Lane.

Summarised comments from other organisations:-

Councillor Ellwood stated the northern part of Gedling covers large parts of the Green Belt and if G06.3 and other sites G04, G05.2 and G07.1 are all

built then the Green Belt in Gedling would be subdivided. It makes sense to have a well-defined boundary for the Green Belt so care should be taken to avoid developing all these sites.

Summarised comments from local residents:-

One resident stated G06 is preferred because it leaves a gap between the city and the development i.e. the city is buffered from these developments and urban sprawl is avoided.

One resident stated G06 is best suited for development due to an increasing demand for rural living post covid-19 pandemic (i.e. less office working).

Three residents stated the Calverton Neighbourhood Plan, which outlined additional future housing, has been completely ignored by Gedling Borough Council.

One resident objected to housing development adjacent to Calverton as the village has had a lot of housing built already recently.

One resident states that the vast majority of the additional need should be allocated making the most of deliverable non-Green Belt land (safeguarded land). The allocation of further dwellings at Top Wighay and/or a large dependence on a SUE around the A60 will not aid any improvement in the five year housing land supply as neither site will provide dwellings for at least 6-10 years from adoption of the plan in 2023. It is only the safeguarded land at Calverton that has any prospect of early delivery and actually aid the current and persistent shortfall in the delivery of dwellings to meet housing need in Gedling Borough.

Two residents stated the Council should build housing on brownfield sites where there is already the right infrastructure to cope with development and there are plenty of brownfield sites in the rest of Gedling and Nottingham area that are not protected Green Belt. Sites to support HS2, trams from Nottingham/Derby and the M1 would be much better suited.

Several residents stated the following issues:-

- Flooding, drainage, traffic parking, doctors and schools are already a problem. There are no plans for any new roads, schools, doctors surgery, sewers etc. The new development will be separated by a main road, is out of the village, away from all amenities/schools, so transport will be needed and will be the size of a small village in itself. The current infrastructure cannot cope with the village size as it is. Calverton only has a local bus service. There is no City bus service, no tram route or proposed tram route and definitely nowhere near HS2. The plan offers no extra infrastructure to accommodate new development and all extra traffic will cause congestion, parking problems and pollution. No extra stores for retail will over stretch current retailers and services. Continued and further erosion of the natural environment and wild life.

- Building so many houses which depend upon at the very least driving to Arnold or nearby areas for shopping, schools, work etc. There will be a significant increase in traffic onto the 6386 Oxtan Road and in particular Whinbush Lane which is used by many as a route around Arnold and Nottingham to get to the A60 and junction 27 of the M1 since Gravelly Hollow was closed off. There will be an increase in traffic onto the 6386 Oxtan Road and A614 which is extremely busy at peak times anyway, as well as additional traffic onto the Woodborough Road and into Arnold and Mapperley.

Gedling Borough Council has set a target to be Carbon Neutral by 2030 and cannot see how this is possible due to more cars needed for commuting. The village is serviced by a bus company and suffers with flooding due to its topography and being in a valley and the main sewers already cannot cope.

G06 is not preferred as this growth option is highly sensitive location, significant highly prized green belt and significant recreational value and it is important that these areas are kept free from new development. The loss of Green Belt would be significant, encroaching on the Southern Ridge Area and Ancient Scheduled Monument (Cockpit Hill) in addition to the loss of a well-used golf course, old woodland and a Millennium Commission community wood. The former colliery area has become an important natural resource and has important Local Wildlife Sites. The wooded areas to the south and southwest of the village have good connectivity that could be enhanced further - as well as developing networks linking to the expansive wooded area (along with the former colliery land) to the north. Part of the ridge to the south of Calverton has been designated as Open Access land and this has the potential for enhanced ecological opportunities. Recreational land that is well used should not be built on G06 unless it is proved that the site is not well used and has no environmental value for wildlife.

G06.1 Land off Oxtan Road

Nottinghamshire County Council, as the minerals and waste planning authority, stated the western boundary of the site, along Hollinwood Lane, is adjacent to the permitted waste management facility Tuxford Exports. If housing was to be proposed within the western area, it is likely this would pose a sterilisation risk to the permitted waste management facility. If this site was to progress further within the Greater Nottingham Strategic Plan, the County Council would seek to be involved within this process and discuss potential mitigation to prevent the sterilisation of this waste management facility. It is also recommended that the operator, Tuxford Exports, are involved with these discussions and throughout the consultation process.

Nottinghamshire Wildlife Trust stated there would be impacts on Local Wildlife Site (Calverton Colliery Yard) and that the site is within Blidworth to Calverton Biodiversity Opportunity Map (BOM) Focal Area.

One resident stated this site would add to the traffic accessing Nottingham from the A616 and A60. The infrastructure available in Calverton needs to be assessed so that health and education facilities are not overloaded. The desirability of this site for development depends on other sites alongside the A60 and A616. Traffic congestion would appear to be a major concern.

One resident stated G06.1 is not preferred if combined with other development around Calverton. The north of the village is the only area which could now be developed, however there are far better options.

One resident stated G06.1 is already approved for development and with no thought to supporting infrastructure.

One resident stated while G06.1 would appear to have the least impact on the geography of the village, based on the number of houses the infrastructure required is another matter. The loss of farm land to housing is not ideal, though far less taxing on the village than the other two site options.

One resident stated G06.1 is non Green Belt land, safeguarded land, sustainable settlement, supported by neighbourhood plan, existing public transport and will additionally benefit from planned park and ride at Leapool island.

G06.2 Ramsdale Park Golf Centre Site A

Nottinghamshire Campaign to Protect Rural England stated that G06.2 is unsuitable for development due to one or more of the following factors: local amenity value; landscape value and sensitivity; risk of coalescence; a Green Belt or remote location, which if developed would make brownfield development and regeneration of urban areas more difficult; remoteness from services and sustainable travel options (no safe walking or cycling and poor or now public transport and little prospect of better PT provision).

Nottinghamshire County Council, as the minerals and waste planning authority, stated there are no mineral or waste issues in terms of safeguarding.

Nottinghamshire Wildlife Trust stated there would be impacts on Local Wildlife Site (George's Lane Scrub) and that the site is within Blidworth to Calverton Biodiversity Opportunity Map (BOM) Focal Area.

Sport England objected to the loss of this site and site G06.3 and stated that appropriate evidence of impact, justification and mitigation for the loss would be required.

One resident stated this site and site G06.3 are not preferred as the road traffic generated would be considerable and would lead to serious congestion on the A60/A616 routes into Nottingham. As a golf course and a riding club, unless these facilities are replaced nearby, building here will lead to a loss of leisure facilities for the North Nottingham area. Both sites are in

a rural location and would need infrastructure to ensure that surrounding villages are not overloaded.

One resident stated this site and site G06.3 are not preferred due to loss of the golf course, woods, Green Belt and impact on Calverton.

One resident stated this site and G06.3 will have the effect of turning a large and already poorly provided for village into a suburb of Arnold and Nottingham City. There is no suggestion of supporting infrastructure provision.

One resident stated G06.2 is removing an area of beauty from the village and the area is full of rabbits, small birds, pheasants, buzzards, kestrels and sparrow hawks etc. Any additional housing here will have a negative impact on the village.

One resident stated there is a well-established circular walk around Calverton which includes five woods (Watchwood Plantation, Gorse Covert, Thorndale Plantation, Fox Wood and Fox Covert (Millennium Wood)). Part of this route follows the edge of the existing golf course. These locations are hundreds of years old and should remain intact. Any future development needs to be mindful of this and ensure they are not disrupted in any way at all.

One resident stated G06.2 is Green Belt land and not supported by the neighbourhood plan.

One resident stated the scheduled historic monument at Cockpit hill is an integral part of the hill side at Ramsdale golf course. There could be further archaeological remains in this area and a thorough study should therefore be undertaken accordingly. Also the golf course is a major and prestigious attraction for Calverton and would be a tremendous loss of income to the area, as well as a loss of leisure activities.

One resident stated that they understood local Golf Courses were given permission on the understanding they may be returned to agricultural land.

G06.3 Ramsdale Park Gold Centre Site B

Nottinghamshire County Council, as the minerals and waste planning authority, noted that the site partially lies within the MSA/MCA for Sherwood sandstone with the north-west corner of the site opposite the permitted quarry of Burnstump/ Calverton which extracts Sherwood Sandstone. At this proximity, there may be some environmental impacts detectable at the proposed site and so development within this corner of the site may sterilise the permitted mineral reserve. If this site was to progress further the County Council would wish to discuss potential mitigations to prevent the mineral and the quarry operation itself being sterilised. It is also recommended that the operator, Tarmac, are involved throughout the consultation process.

Nottinghamshire Wildlife Trust objected to the site. Impacts on Local Wildlife Site (George's Lane Scrub) and that the site is within Blidworth to

Calverton Biodiversity Opportunity Map (BOM) Focal Area. Major intrusion into the wider countryside with potential significant loss of S41 Priority Habitats. Golf courses in general support much biodiversity.

Sport England objected to the loss of this site (as well as site G06.2) and stated that appropriate evidence of impact, justification and mitigation for the loss would be required.

One resident stated this site and site G06.2 are not preferred as the road traffic generated would be considerable and would lead to serious congestion on the A60/A616 routes into Nottingham. Both sites are currently a golf course and a riding club. Unless these facilities are replaced nearby, building here will lead to a loss of leisure facilities for the North Nottingham area. Both these sites are in a rural location and would need infrastructure to ensure that surrounding villages are not overloaded.

One resident stated this site and site G06.2 are not preferred due to loss of the golf course, woods, Green Belt and impact on Calverton.

One resident stated this site and site G06.2 will have the effect of turning a large and already poorly provided for village into a suburb of Arnold and Nottingham City. There is no suggestion of supporting infrastructure provision.

One resident stated G06.3 is a huge change to the village. The western end of the village would become almost the centre of the new town. The impact on wildlife would be much the same, though to a greater extent as I have stated for G06.2. This is the worst option.

One resident stated there is a well-established circular walk around Calverton which includes five woods (Watchwood Plantation, Gorse Covert, Thorndale Plantation, Fox Wood and Fox Covert (Millennium Wood)). Part of this route follows the edge of the existing golf course. These locations are hundreds of years old and should remain intact. Any future development needs to be mindful of this and ensure they are not disrupted in any way at all.

One resident stated G06.3 is Green Belt land and not supported by the neighbourhood plan.

One resident stated the scheduled historic monument at Cockpit hill is an integral part of the hill side at Ramsdale golf course. There could be further archaeological remains in this area and a thorough study should be undertaken. Also the golf course is a major and prestigious attraction for Calverton and would be a tremendous loss of income to the area, as well as a loss of leisure activities.

One resident stated that they understood local Golf Courses were given permission on the understanding they may be returned to agricultural land.

G06: New sites

Langridge Homes Ltd promoted their land to the west of Calverton between Main Street and Georges Lane (SHLAA sites G33 and G45).

7. **G07 Arnold Extension (General Comments)**

Summarised comments from statutory organisations:-

No comments.

Summarised comments from developers:-

Development of the land at Land at Stockings Farm, Redhill (i.e. site G07.1) is fully supported by **Hammond Farms**.

Development of the land at Land at Middlebeck Farm, Mapperley (i.e. site G07.2) is fully supported by **Barwood Land**.

Summarised comments from other organisations:-

Councillor Ellwood stated the northern part of Gedling covers large parts of the Green Belt and if G07.1 and other sites G04, G05.2 and G06.3 are all built then the Green Belt in Gedling would be subdivided. It makes sense to have a well-defined boundary for the Green Belt so care should be taken to avoid developing all these sites.

Councillor Payne had concerns about the further pressure on local public services and infrastructure in and around the Redhill and Arnold areas if future housing growth were to be pursued in G07.1 and other sites G05.1 and G05.2. Any additional housing growth would add further pressure and congestion on the A60 Mansfield Road from Leapool Roundabout in Redhill through the urban area of Redhill and onwards towards Daybrook Square.

Summarised comments from local residents:-

One resident stated Gedling should concentrate around Arnold.

Three residents stated G07 is preferred because site is serviced by the NET tram or extension to tram network, involves minimising car journeys to major employers and schools in the area and is not bordering edge of highways. Urban extension is the preferred option as G07 is one of the sites that do not involve building on Green Belt land and are near city/employment or tram stops.

One resident stated G07 is connected to the existing urban area and is a practical location for further development provided high standards of design are used.

One resident stated the areas with the best connections, including G07, are best to develop first.

One resident stated G07 is preferred as it will connect areas and benefit local shops and it will make it easier for emergency services and other services. Gedling is the most disadvantaged as it is not on a major road route (M1, A453, A610 or A46), no strong rail links and the borough is mainly used as a commuter area and thus produces a population that works in the factories, offices and hospitals around Nottingham. Gedling should focus on residential development on sites including G07.

One resident stated that development on G07 would not impact significantly on the Green Belt.

One resident stated they are against the development in the eastern area of G07 in particular due to the traffic concerns along the B684 as well as the impact on Green Belt and views into the western Dumbles area. However, the southern tip of the western part of G07 (between existing development, the A60 and the brickworks on Lime Lane) is an understandable area for development. However, the western part of G07 should not extend North of Lime Lane.

G07.1 Land at Stockings Farm, Redhill

Nottinghamshire County Council, as the minerals and waste planning authority, noted that this site is within the MSA/MCA for brick clay. As per paragraph 204 of the National Planning Policy Framework and Policy SP7 in the emerging Nottinghamshire Minerals Local Plan, if this site was to be taken forward within the Greater Nottingham Strategic Plan, it will need to be demonstrated that development on site will not needlessly sterilise mineral resource and there is a clear need for non-mineral development in this area. Prior extraction will also be sought where practical. The eastern boundary borders the permitted Dorket Head brick clay works and current permitted clay reserves (to the east of the brick works) are expected to last until 2033, however the brickworks could continue beyond this date if further reserves are identified in the future. It is recommended that the operator, Ibstock, is involved throughout the consultation process if this site was to be taken further within the Greater Nottingham Strategic Plan. In relation to waste, the rectangular area in the south-east corner which is not covered by the proposed area is the historic landfill site of Calverton Road (ceased in 1978). If this site was to progress further within the Greater Nottingham Strategic Plan, the County Council would recommend that further advice be sought for the EA and the County Councils Landscape and Regeneration Team to understand what site investigation may be required as well as engineering measures that may be needed if the site is impacted by possible site settlement and/ or landfill gas emissions.

Nottinghamshire Wildlife Trust stated there would be major intrusion into the wider countryside.

One resident stated G07.1 is preferred due to infill development between major roads.

One resident stated G07.1 is not preferred as the road traffic generated would be considerable and would lead to serious congestion on the A60/A616 routes into Nottingham. This site would appear to be more suitable for development than others adjacent to the A60 as it is moderate in size and is close to the facilities of Arnold. However access should not be directly onto the A60.

One resident stated their concern on the impact of G07.1 (as well as other sites G05.1 and G05.2). This is a large loss of Green Belt land and impact to the Redhill area would be affected by any large scale development, from infrastructure strain to increased population and transportation links. Proposed tram extension does not give any direct benefit to Redhill area and the proposed Park & Ride at Redhill is unlikely to resolve traffic flows. Green Belt land was developed to prevent the spread / sprawl of large built up areas and development of G07.1 could eventually lead to sprawl of areas from Dorket Head into Calverton. Details of how this would be managed and prevented should be included. Additional resources and infrastructure projects should be included in any development plans.

One resident stated once the required 250m buffer is applied to the Ibstock brick factory, which will remain in operation beyond 2038 and the primary ridge-line is taken into account, the area of G07.1 available for development is very limited. The resulting narrow development area stretches away from the PUA appearing as urban sprawl conflicting with the purposes of Green Belt, confirmed by the Gedling 2015 Green Belt assessment where it scored highly. Landscape is a major constraint.

G07.2 Land at Middlebeck Farm, Mapperley

Nottinghamshire Campaign to Protect Rural England stated that G07.2 is unsuitable for development due to one or more of the following factors: local amenity value; landscape value and sensitivity; risk of coalescence; a Green Belt or remote location, which if developed would make brownfield development and regeneration of urban areas more difficult; remoteness from services and sustainable travel options (no safe walking or cycling and poor or now public transport and little prospect of better PT provision).

Nottinghamshire County Council, as the minerals and waste planning authority, stated this site lies within the MSA/MCA for brick clay. As per paragraph 204 of the National Planning Policy Framework and Policy SP7 in the emerging Nottinghamshire Minerals Local Plan, if this site was to be taken forward within the Greater Nottingham Strategic Plan, it will need to be demonstrated that development on site will not needlessly sterilise mineral resource and there is a clear need for non-mineral development in this area. If this can be demonstrated, prior extraction will also be sought where practical and so any proposed development will need to demonstrate this has also been considered and if found not to be practical nor viable, why this is the case.

Nottinghamshire Wildlife Trust objected to the site. Impacts on Local Wildlife Sites (Mapperley Plains Paddocks and Grassland/ Hedge Lambley).

One resident stated G07.2 is on the edge of a large built up area which could put pressure on infrastructure. There is reasonable access to Nottingham City centre and also areas such as the City Hospital.

One resident stated G07.2 is not preferred due to traffic concerns on B684, loss of Green Belt and impact on the views into the Dumbles area.

One resident stated G07.2 fails on the purposes of Green Belt.

G07: New sites

Conlon Construction (Nottm) Ltd has promoted their site “Extension to Land at Middlebeck Farm, Mapperley” to the south of site G07.2 Land at Middlebeck Farm, Mapperley.

8. **G08 Woodborough Extension (General Comments)**

Summarised comments from statutory organisations:-

Ravenshead Parish Council did not support further allocations in G08. They support the broad areas of search that focus on sustainable urban extensions rather than increasing allocations at main settlements.

Woodborough Parish Council stated development within a small village with limited resources and facilities would not be preferable. Woodborough village is experiencing flooding with increasing regularity and the Environment Agency identified site G08.1 as the optimal location for a scheme to capture flood water upstream and hence reduce risk of flood in Woodborough. The scheme did not reach fruition due to a change of heart on behalf of the former landowner but the project planning reached an advanced stage. It is hoped that the scheme can be revived.

Summarised comments from developers:-

No comments.

Summarised comments from other organisations:-

No comments.

Summarised comments from local residents:-

One resident stated G08 is preferred because they leave a gap between the city and the development i.e. the city is buffered from these developments and an urban sprawl is avoided.

One resident stated there are some areas shown on the map which appear to be ridiculous including G08.

G08.1 Land North of Bank Hill

Nottinghamshire County Council, as the minerals and waste planning authority, stated this the western area of this site lies within the MSA/MCA for brick clay. As per paragraph 204 of the National Planning Policy Framework and Policy SP7 in the emerging Nottinghamshire Minerals Local Plan, if this site was to be taken forward it will need to be demonstrated that development will not sterilise mineral resource and there is a clear need for non-mineral development. Prior extraction will also be sought where practical.

Woodborough Parish Council stated G08.1 is unsuitable for housing as the site stands in the path of excessive flows of water and sediment during flooding episodes. Flooding in the village may worsen as the developed area reduces the amount of water able to seep away before entering the village. Development on site will remove the possibility of construction of a scheme to mitigate flooding.

One resident stated a small development in the south-eastern part of G08.1 would be understandable, however this should avoid the stream running through the valley.

One resident stated to maintain the rural environment the number of houses on site would have to be restricted and the viability of infrastructure maintained. There would not appear to be any employment opportunities close by and therefore residents would need to travel.

One resident stated that infrastructure for schools, shops and surgeries would not be viable, it would change the character of the Green Belt area and the area is subject to surface water flooding which is occurring more frequently. The removal of washed over green belt areas for half the village has encouraged higher density of development through extensions and the intension of ensuring the Conservation Area provides protection for this change has not been achieved in full.

One resident stated the development of G08.1 does not respect local context and would be entirely out of the character of the area. The proposed site will have a detrimental impact on the villages drainage, which already has significant issues.

One resident stated the centre of Woodborough village lies in a valley, surrounded by farmland and is subject to regular flooding. The existing watercourse runs through the village in an easterly direction, rising in farmland to the west of the Woodborough. This watercourse becomes inundated during severe weather. Floodwater then runs along Main Street putting additional properties at risk. The farmland between Bank Hill and the stream in the bottom of the valley acts as a soakaway and should not under any circumstances be developed. The village of Lowdham also suffers from flooding. An increase in floodwater in that direction from Woodborough will only exacerbate their problems.

One resident stated G08.1 is non strategic site.

9. **G09 Carlton Extension (General Comments)**

Summarised comments from statutory organisations:-

No comments.

Summarised comments from developers:-

No comments.

Summarised comments from other organisations:-

Councillor Ellwood stated part of G09.1 is currently within the Local Plan for Gedling allocated for 110 houses. There are significant concerns about traffic safety in the immediate area if this site was expanded and any houses allocated to this site in future Local Plan.

Summarised comments from local residents:-

One resident stated the obvious priorities for development would be broad areas, including G09, along the current and proposed tram routes.

One resident stated G09 is preferred if the existing tram network expand to connect to the site.

Three residents stated G09 is preferred because site meet the priority which they are site serviced by the NET tram or extension to tram network, site involves minimising car journeys to major employers and schools in the area and site not bordering edge of highways.

One resident stated that once the new Gedling By-Pass (i.e. Gedling Access Road) is completed, it is not clear why the area of land surrounded by built-up areas and the Gedling Country Park has not been considered for development.

G09.1 Land off Lambley Lane

Nottinghamshire County Council, as the minerals and waste planning authority, stated this site lies within the MSA/MCA for brick clay. As per paragraph 204 of the National Planning Policy Framework and Policy SP7 in the emerging Nottinghamshire Minerals Local Plan, if this site was to be taken forward within the Greater Nottingham Plan, it will need to be demonstrated that development on site will not needlessly sterilise mineral resource and there is a clear need for non-mineral development in this area. If this can be demonstrated, prior extraction will also be sought where practical and so any proposed development will need to demonstrate this

has also been considered and if found not to be practical nor viable, why this is the case.

Nottinghamshire Wildlife Trust objected to the site. Impacts on Local Nature Reserves Gedling House Wood and Gedling House Meadow.

One resident stated G09.1 is preferred if the tram extended.

One resident stated there is already a large development taking place on land adjacent to the A6211 which provides a main route into Nottingham and the additional development on G09.1 would add to any traffic congestion. There is the Nottingham to Grantham train line which could be accessed at Netherfield and Colwick and if this site were to be developed it would add to the infrastructural needs of the Gedling area.

One resident stated G09.1 is non strategic.

G09: New sites

The landowners promoted their site "Land at Gedling Wood Farm" to the east of Carlton.

10. **G10 Burton Joyce Extension (General Comments)**

Summarised comments from statutory organisations:-

Burton Joyce Parish Council stated that there is a strong case against development in G10 for geo-environmental, rural fringe retention and local impact reasons. G10 is agricultural land or uniquely wooded escarpment and plays a significant part in providing a habitat for wildlife and maintaining better air quality. G10 is important in coping with the danger of flooding resulting from surface-water run-off, a problem to which Burton Joyce being confined to the narrow space between the high ground to the north and the Trent to the south. The sloping land is always at risk of land slippage so new building would be both at risk itself and a threat to existing dwellings below. Transport systems, such as the A612 and other local roads, are already inadequate for the traffic of Burton Joyce at its present size and an expansion of the traffic demands from a greater population would make problems much worse. The extra pressure on the road system already due to arise from the completion of the Gedling Access Road and associated new building only increases the unsuitability of any additional traffic burden. The Burton Joyce Neighbourhood Plan sets out community objectives and plans for sustainable development which would be destroyed by inclusion of G10 in the final Strategic Plan.

Nottinghamshire County Council, as the minerals and waste planning authority, stated this broad search area lies within the MSA/MCA for brick clay. As per paragraph 204 of the National Planning Policy Framework and Policy SP7 in the emerging Nottinghamshire Minerals Local Plan, if this site was to be taken forward within the Greater Nottingham Strategic Plan, it will need to be demonstrated that development on site will not needlessly

sterilise mineral resource and there is a clear need for non-mineral development in this area. If this can be demonstrated, prior extraction will also be sought where practical and so any proposed development will need to demonstrate this has also been considered and if found not to be practical nor viable, why this is the case.

Ravenshead Parish Council did not support further allocations in G10. They support the broad areas of search that focus on sustainable urban extensions rather than increasing allocations to what are defined as main settlements.

Summarised comments from developers:-

No comments.

Summarised comments from other organisations:-

No comments.

Summarised comments from local residents:-

One resident stated Gedling should concentrate around Burton Joyce and G10 is preferred as it will connect areas and benefit local shops and it will make it easier for emergency services and other services. Gedling is the most disadvantaged as it is not on a major road route (M1, A453, A610 or A46), no strong rail links and the borough is mainly used as a commuter area and thus produces a population that works in the factories, offices and hospitals around Nottingham. Gedling should focus on residential development on sites including G10.

One resident stated the obvious priorities for development would be broad areas, including G10, along the current and proposed tram routes.

One resident stated G10 is best suited for development due to an increasing demand for rural living post covid-19 pandemic (i.e. less office working).

Three residents stated G10 is preferred because site meet the priority which they are site serviced by the NET tram or extension to tram network, site involves minimising car journeys to major employers and schools in the area and site not bordering edge of highways.

One resident stated G10 is preferred if the existing tram network expand to connect to the site.

One resident states Burton Joyce has not seen the rate of expansion as other villages in the Gedling Borough area. This is mainly due to topography and flooding issues, however there are pockets of land within and adjacent to the village that could be developed and these sites should be explored. Burton Joyce has not seen the rate of expansion as other villages in the Gedling Borough area. This is mainly due to topography and flooding issues,

however there are pockets of land within and adjacent to the village that could be developed and these sites should be explored.

One resident referred to the change to the Green Belt boundary to the rear of his property which was agreed through the adoption of the Gedling Borough's Part 2 Local Plan which has not been reflected in the Growth Options document.

Two residents stated there are several other identified sites preferred including Lambley Lane, Burton Joyce/Glebe Farm as these currently have the supporting infrastructure in place.

GO10: New sites

Persimmon Homes promoted their site "Colwick Loop Road" to the south of west of Burton Joyce.

The landowners promoted their land (SHLAA sites G830 and G923) adjacent to the existing housing allocation H21 Orchard Close in Burton Joyce.

Site Specific Comments: Nottingham City

1. **B08.5 Extension to Woodhouse Park**

Summarised comments from statutory organisations

Nottinghamshire County Council commented that the site is within a Minerals Safeguarding and Consultation Area for surface coal and so the Coal Authority, which is based in Mansfield, would need to be contacted for further advice.

Nottinghamshire Wildlife Trust objects to the inclusion of this site due to : Impacts on Stonepit Plantation LWS, geological site and Wildlife Trust nature reserve and Strelley Hall Park LWS. Potential impacts on protected and priority (Section 41 NERC Act) species (Common toad and great crested newt), as Strelley village area supports exceptional populations of both these species.

Summarised comments from developers

Savills on Behalf of Wilson Bowden support the inclusion of Site B08.5 'Extension to Woodhouse Park' as a preferred development site. Site B08.5 is located within Area B08 which has been assessed in the Greater Nottingham Growth Options Study (July 2020) as a 'high potential area for strategic growth' and site B08.5 within it is considered to be 'potentially suitable'. Page 119 of the Growth Options Study states that the reason site B08.5 has been assessed as 'potentially suitable' rather than 'suitable', is that the authorities seek to understand the impacts on heritage assets and coalescence risk with Woodhouse Park and the wider strategic opportunity. As only 7 areas have been identified as being 'high potential area[s] for strategic growth', we therefore consider that the sites within these areas, whether they are 'suitable' or 'potentially suitable' should be prioritised for development over sites within Areas that have been assessed as a 'potential area of strategic growth'. We consider that the development of Site B08.5 would form a logical extension to the existing residential area. The Nottingham City SHLAA 2019 has assessed the site as 'not suitable' for development (SHLAA reference 2499). The key reason for this assessment was related to policy constraints which are considered can be overcome if Site B08.5 is released from the Green Belt and allocated in this Strategic Plan. WBD has sought technical advice on a range of matters and it is considered that there are no environmental or heritage constraints that would impact on the ability of Site B08.5 delivering housing.

Summarised comments from local residents

2 residents thought the site looks like a logical extension to an existing estate and preserves a green corridor between Nottingham and the M1. However, is the air quality in this location likely to be safe for residents given the proximity of the M1 and A6002?

A resident thought the site could be developed as it extends an already existing site and there is easy access to a supermarket and a business park. It is separated from the older part of Strelley by the A6002 which provides access to the M1 and the HS2 Hub at Toton. Currently it would seem that families have to cross the busy A6002 to access schools and health provision. This would need to be considered as a safety issue.

Site Specific Comments: Rushcliffe

1. R01 East Bridgford

Summarised comments from statutory organisations:-

East Bridgford Parish Council object to their parish being identified in a growth zone. It highlights that the parish has already been allocated significant level of housing through the RBC Local Plan Part 2, and the lack of supporting infrastructure in the area to support any further growth in addition to that. It also objects on due to the loss of Green Belt.

Nottinghamshire County Council (Minerals and Waste) highlights that part of this area of search, near the River Trent, lies within the MSA/MCA for sand and gravel. As per National Policy (Paragraph 204) and Policy SP7 in the emerging Nottinghamshire Minerals Local Plan, if this site was to be taken forward within the Greater Nottingham Plan, it will need to be demonstrated that development here will not needlessly sterilise mineral resource and there is a clear need for non-mineral development in this area. If this can be demonstrated, prior extraction will also be sought where practical and so any proposed development will need to demonstrate this has also been considered and if found not to be practical nor viable, why this is the case.

Summarised comments from developers:-

As site promoters for land included in this development zone (land north west of East Bridgford), **Taylor Wimpey** supports development in this area. It suggests that R01 qualifies as a strategic site and should be included in draft plan. It supports this as part of an overall strategy that combines some rural development alongside urban concentration.

The landowners Mr and Mrs Hammond support development at R01 as a “non- strategic growth option” and promotes two additional sites for residential development at Closes Side Lane and Springdale Lane. They state focusing development on the south east of the village would focus development on the less sensitive parts of the growth area and be more accessible with the option of exploring integration with employment development at Margidunum (a separate land holding by the same landowner is submitted for employment development) and land north of Bingham.

The Stagfield Group supports development within this growth zone as landowners of part of the area. It states support for further growth in East Bridgford which could elevate the settlement to that of a “key settlement”. Its representation includes two vision documents – one promoting a larger

village extension to the A46 with further employment beyond, and one for a small village extension.

Summarised comments from other organisations:-

Nottinghamshire Wildlife Trust object to the inclusion of the site due to the impact on parish nature reserves (including Springdale Wood and Meadow, Bridgford Street Meadow and Copse) and Local Wildlife Sites (Trent Hills Wood). It considers it would constitute a major incursion into the countryside.

Summarised comments from local residents

A small number of respondents (less than five) supported the growth zone citing its accessible location and its appropriateness for mixed use development.

A small number (less than five) also highlighted the suitability of the site as an eco-village.

A small number of respondents (less than 10) objected to the growth zone on the basis of the loss of Green Belt and insufficient capacity on surrounding highways network, lack of public transport accessibility, scale of recent housing development in the nearby area and Rushcliffe, lack of other infrastructure capacity and concerns over exacerbation of existing flooding issues and impact on landscape character, rural character and historic character, loss of significant area of agricultural land.

Coalescence with the village of Shelford was also raised as an objection.

2. R02 RAF Newton

Summarised comments from statutory organisations:-

Saxondale Parish Meeting objects due to the lack of justification provided for further housing, significant levels of recent housing development in the area, lack of supporting infrastructure to support any further growth, and lack of capacity on the A52 corridor.

Calverton Parish Council support development in this location, citing the Growth Study's conclusion of it having high potential for strategic growth, high levels of accessibility and good local employment opportunities (due to proximity of available employment land and suitability for the logistics industry due to accessibility).

Summarised comments from developers:-

The Defence Infrastructure Organisation (site owners) support redevelopment of R02.2 area, citing the positive sustainability credentials of reusing a redundant brownfield site and the suitability in terms of its location adjacent to the existing allocation at RAF Newton. One of the few sites that are strategic in scale. Other identified advantages – low risk of flooding, not within or near to any statutory designations, no designated heritage assets, good accessibility given proximity to strategic road network.

The Crown Estate query whether the site would have the critical mass to meet the criteria of a co-dependent new settlement as set out in the study. It states that R03 would be preferable to R02 due to its closer proximity to Bingham, railway stations etc.

Stagfield Group highlight the lack of achievable access for site R02.2 as a key constraint.

Newton Nottingham LLP supports allocation of the site for housing development, citing its lower importance in Green Belt terms, lower landscape impact (as recognised by the Growth Options study), logical suitability due to the neighbouring area forming the RAF Newton strategic allocation with its associated facilities, infrastructure and services this will provide, which, along with the development north of Bingham will provide a critical mass capable of delivering significant employment led growth. It suggests the growth zone should be expanded to include land in between the R02 zone and the existing allocation with their submission including full details. It states this area is in their control and available for development.

Summarised comments from other organisations:-

Nottinghamshire CPRE object on the basis of poor sustainability given the distance of the site from key services and facilities and lack of public transport provision.

Nottinghamshire Wildlife Trust refers to the Biodiversity Opportunity Mapping report citing the site specific recommendations contained in it. It objects to R02.2 as a major intrusion into the wider countryside, away from the brownfield footprint of the airfield. It also highlights the need to consider the wider cumulative impact on biodiversity of other local plan allocations.

Ward Members for East Leake raise concern about scale of growth if considered cumulatively with R03, R04, R05 and R06 and resultant sprawl.

Summarised comments from local residents

A small number of respondents (less than five) support development, citing the Growth Options study's assessment of the area as being one of "high

potential”, its good accessibility due to proximity of A46 and the ability of the site to integrate with the existing strategic allocation, established bus service and relative proximity of Bingham railway station and the capacity of area for future employment growth.

A small number of respondents supported R02 as a preferable strategy to developing areas adjacent to main urban area which leads to sprawl.

A small number of respondents highlighted the suitability of the site as an eco-village.

A small number of respondents (less than 10) object on the basis of the significant levels of housing growth in the area over growth over recent years and the levels of existing commitments and the lack of infrastructure capacity (including secondary school provision) to support any further growth. Respondents also objected on the basis of loss of Green Belt, distance from key facilities and lack of capacity on local road network and lack of sustainable transport options which would result in poor sustainability due to increased car journeys and consequent negative impact on climate change.

A small number (less than five) expressed preference for development closer to Nottingham city centre.

A small number also objected on the basis of the size of the growth zone and scale of development that it would result in, and the consequent merging of settlements.

3. **R03 Bingham extension**

Summarised comments from statutory organisations:-

Saxondale Parish Meeting object stating their objection to further growth along the A52 corridor due to sprawl, lack of public transport accessibility, lack of supporting infrastructure, specifically schools, community centres, green spaces, small shopping provision as opposed to large supermarkets – the types of development needed to give a sense of community and identity. Saxondale Parish Meeting object stating their objection to further.

Erewash BC request the councils consider releasing this site for development to help meet Erewash’s unmet housing need as a preferable to releasing Green Belt sites in Erewash.

Nottinghamshire CPRE object to R03.2 due to local amenity value; landscape value and sensitivity; risk of coalescence; remote location, which if developed would make brownfield development and regeneration of urban areas more difficult; remoteness from services and sustainable travel options

(no safe walking or cycling and poor or now public transport and little prospect of better PT provision)

Nottinghamshire Wildlife Trust object to all sites identified under the R03 zone arguing they constitute a major intrusion into the countryside when considered alongside existing Local Plan strategic allocations. It also identifies the need to refer to the recommendations of the Biodiversity Opportunities Mapping report for each site.

Sport England highlight that R03.2 shares a boundary with the Butts Field sports ground – consideration will be needed on the expansion of cricket of cricket at the site with regard to ball strike and the need for a risk assessment and impact on football.

Calverton Parish Council support development in this location, citing the Growth Study's conclusion of it having high potential for strategic growth, high levels of accessibility and good local employment opportunities in proximity.

Summarised comments from developers:-

The Crown Estate, as landowners, support development in this location. It supports the Growth Study's assessment of the site as suitable and of high potential and emphasise it is the only site outside the Green Belt that is assessed as being of high potential. It states the AECOM assessment of sites should take greater account of the Green Belt constraints, emphasising the advantage of this site as being one of the few strategic locations available outside the Green Belt. It also highlights the following other advantages: the situation of the site on a multi modal transport corridor, the ability to integrate with the existing allocation, and the advantages in terms of deliverability of the site being in single ownership. It also highlights the sustainability in terms of the exiting employment commitments, and the plans for a new leisure centre and the other uses (community hall, bus services, and town park) being developed as part of the existing allocation. It objects to the AECOM study's assessment of flood risk in relation to the site. The study states that the reservoir to the south of the site puts the area at high risk of flooding. The Crown Estate states that the reservoir is a flood mitigation measure designed for the existing allocation and designed to remove flood risk and approved by the Environment Agency. The Crown Estate requests that any future assessment of the site against environmental considerations is amended to acknowledge the role of the lake. It also disagrees with the assessment's consideration of heritage impact and request this be upgraded to a "green" assessment.

The Stagfield Group, owners of a land in the R01 growth zone, query the deliverability of the three sites identified (R03.1, R03.2 and R03.3) due to the single ownership of the sites by the Crown Estate, along with their existing

local plan allocation that is currently part way through a long build out with the majority still to be sold on to a developer. It queries the deliverability of further sites within the plan period on this basis, citing market saturation and lack of incentive to release the land to a developer.

FH Farms Ltd are landowners of an alternative site outside the growth zone ("Land west of Car Colston") and suggest the growth area is extended to include that site. It argues the growth area is highlight accessible and of lower landscape value.

The executors of Evelyn Shepperson support development in the growth zone, in particular land east of Bingham north of the A52 and south of the railway. Their land interest forms two small parcels of land which fall just outside the boundary identified for R03.3. They state the land is free of constraints, and highlights the Growth Study's conclusion of the area as being of high potential for strategic growth. They suggest R03.3 is extended to include their client's land.

Summarised comments from other organisations:-

Ward Members for East Leake raise concern about scale of growth if considered cumulatively with R03, R04, R05 and R06 and the resultant sprawl.

Summarised comments from local residents

A number of respondents from Aslockton objected to the identification of the growth zone, principally citing scale and the coalescence of Aslockton and Bingham and loss of identity that would result, insufficient capacity on the road network and resultant congestion, poor public transport accessibility (referring to the infrequent rail service), negative impact on historic character, exacerbation of flood risk and general lack of infrastructure to support the level of growth. Some comments specifically highlighted perceived contractions within in the AECOM report in terms of consideration of coalescence (which was considered a negative) with a positive consideration of the presence of the railway station links (which in order to benefit from would result in coalescence). A resident of Car Colston also objects due to the impact on the village in terms of traffic generated.

A large number stated their preference for an urban intensification strategy instead of development in this location. A number of respondents objected due to the high level of housing growth already permitted in Bingham and the impact of any additional growth on infrastructure (specifically the local road network secondary school provision, Green Belt and the need for more car parking in the village). Some specifically cited the need for a fourth Trent Crossing and the need for improve road links south of the Trent. Other

objections included the loss of high quality agricultural land, concerns over road safety, the ecological impact of growth and the lack of sustainable transport options.

Those who supported development cited the good availability of employment opportunities, the good level of accessibility due to proximity to A52 and A46 and a preference for a strategy that wouldn't lead to urban intensification.

4. R04 Aslockton Extension

Summarised comments from statutory organisations:-

Aslockton Parish Council has made no specific comments in terms of this particular location. It has made general comments in relation to the growth strategies, which are unsupportive of a dispersed pattern of growth.

Nottinghamshire County Council (Minerals and Waste) highlights that In relation to minerals, this broad search area lies within the MSA/MCA for gypsum. As per National Policy (Paragraph 204) and Policy SP7 in the emerging Nottinghamshire Minerals Local Plan, if this site was to be taken forward within the Greater Nottingham Plan, it will need to be demonstrated that development here will not needlessly sterilise mineral resource and there is a clear need for non-mineral development in this area. If this can be demonstrated, prior extraction will also be sought where practical and so any proposed development will need to demonstrate this has also been considered and if found not to be practical nor viable, why this is the case.

Summarised comments from developers:-

Mr J Breedon considers that Aslockton is an appropriate location for growth. Their preferred site relates to Land north of Abbey Lane, Aslockton for non-strategic housing growth. The site is 17ha and forms the north western area of 'RO4 – Aslockton Extension'. Our client's land is available in whole or in part to accommodate housing development proportionate to Aslockton and boost the supply and choice of housing in the Nottingham Core Housing Market Area. There are no known development constraints in terms of land conditions or other constraints and the site has good access from the main road network serving the village.

Davidsons Developments considers that Aslockton provides a range of facilities that satisfies a far greater number of the destinations required for the accessibility assessment and on the basis that the village is able to meet the essential day-to-day needs of residents and provide rail services to Nottingham, Grantham, the midlands and wider country, the village should support sustainable housing growth. It identifies Land North of Abbey Road as being suitable.

Hollins Strategic Land support the identification of part of R04 (Aslockton extension) as a growth option road area of search. HSL is representing two landowners on the south-west edge of the settlement. The land could be developed for 130-160 homes with significant areas of landscape planting and open space. The site is a short walking distance from the train station and the local primary school. **HSL** is an experienced land promoter and developer with a housebuilding sister company called Hollins Homes

Summarised comments from other organisations:-

The Leake Ward members consider that development at Aslockton in combination with other sites identified would lead to a long finger of development along the A52. A vicar representing the Cranmer Group of Parish churches echo comments raised by others as outlined below.

Summarised comments from local residents

There were a number of comments received from individuals. Some comments state that the settlement would not serve Nottingham's needs given the distance from Nottingham where most employment is located, and development would increase car dependency and lead to greater CO2 emissions. Other comments have stated that Aslockton has poor public transport to areas with jobs and facilities in terms of quality and frequency. Other comments state that the Aslockton extension is unsustainable in terms of highways and transport and would lead to a significant increase in commuting.

Some comments are concerned that it is not possible to expand the secondary school and primary capacity in the area. Others raise concerns in relation to the lack of facilities at Aslockton and in the wider area. Particular concerns were raised in relation to highway safety along New Lane, around schools at pick up and drop off time and the safety of other accesses from minor roads in the area onto the A52. Another comment raises concerns that there are a lack of foot and cycle paths along Abbey Lane. In addition, some comments observed that the A52 was a single carriage road along its length, and that it was already congested.

Concerns have also been raised in relation to flood risk from rivers and also from surface water. Other comments have pointed that development in this location would lead to the loss of high quality agricultural land. One comment does not support further development based on the quality of the development at Aslacr Park, including poor non-native planting and the poor quality park. Another comment is concerned that the development would lead to an erosion of village character, in particular its historic character. Other comments consider that the development of this option, together with the larger option at Bingham would effectively merge the two settlements

together, something that the growth options study states that it is important to avoid.

Conversely, one comment supports development along the transport corridor, including the R04 at Aslockton. Another comment prefers sites that are further away from the city as they would leave a green gap around it.

5. **R05 South of Orston**

Summarised comments from statutory organisations:-

Orston Parish Council (OPC) objects to potential housing growth. It believes the proposal fails to address the issues identified in the Government's Garden Communities Prospectus – including that garden villages must be sited on predominantly brownfield sites and have the ability to expand substantially further in the future. OPC also believes that R05 would not meet key issues that the Growth Options documents states should be addressed, including generating new jobs and increasing bio diversity. OPC believes the Growth Study Report seriously overstates the potential of the site through error, omission, and inadequate analysis. OPC also argues against development on the grounds that include: it would destroy the settlement pattern of Orston, Elton and Bottesford by coalescing them over time; it would place an unacceptable burden on Bottesford's infrastructure; the junction with the A52 is incapable of being improved to safely support the level of traffic that would be generated; and it would cause unacceptable harm to the setting of the Orston Conservation Area.

Elton on the Hill Parish Meeting objects to R05 due to road safety concerns relating to the nearby A52 junction; congestion and pollution as a consequence of significant additional traffic; impact on recreational users such as cyclists and hikers in the vicinity of the site; the lack of Infrastructure locally to support development; the availability of other more suitable sites; the inadequacy of rail service on the Grantham to Nottingham line; the adverse impact that would result on the rural character and locally attractive views; the lack of integrated planning in the way proposals have been progressed; an absence of any economic reasons to support development; and the unacceptable loss of agricultural land that would result.

Nottinghamshire County Council (NCC) highlights that this broad search area lies within the Mineral Safeguarding and Consultation Areas (MSA/MCA) for gypsum. As per NPPF (paragraph 204) and Policy SP7 in the emerging Nottinghamshire Minerals Local Plan, if this site was to be taken forward within the plan, NCC advises that it would need to be demonstrated that development would not needlessly sterilise mineral resource and there is a clear need for non-mineral development in this area. If this can be demonstrated, NCC advises that prior extraction would also be

sought where practical and so any proposed development will need to demonstrate this has also been considered and if found not to be practical nor viable, why this is the case.

Erewash Borough Council (EBC) notes that the Growth Options study has identified a number of non-Green Belt development opportunities, including R05 (South of Orston). EBC wishes to formally ask whether any of these potential development options are available to help avoid the need for EBC to develop land within Erewash's Green Belt.

Summarised comments from developers:-

The landowner consortium (south of Orston) supports the identification of this broad area of search for a number of reasons and argues that there are sound planning grounds for development of around 3,000 homes. This includes the availability of sustainable transport as the site is situated along the Nottingham/ Grantham line growth corridor, with the Elton and Orston railway station located centrally within the site; its location close to the A52 which provides close access to Nottingham and Grantham; a new settlement can be provided based on the Garden City principles to ensure the delivery of a high quality place; the site is immediately available for development and can come forward within a period of 0-5 years; the good cycling connections locally; the site can be master planned to allow sufficient buffers and stand offs to the Orston Conservation Area; and future master planning could ensure biodiversity enhancements and ecological mitigation are made to the landscape, and could weave these into the development to create a sense of place.

British Gypsum – Saint Gobain (BGS) raises concerns over the potential sterilisation of nationally important future gypsum resources. BGS states that, although not permitted, these resources are important as gypsum can only be mined in very few locations in the UK. Nottinghamshire is one of these locations and the County Mineral plan identifies the outcrop that should be protected from development. Specifically concerning R05, BGS highlights that it includes the former Orston mine and factory, which it believes has potential for extraction and should be protected from development that sterilises the gypsum resources.

Summarised comments from other organisations:-

Girlguiding Nottinghamshire and 36th Nottingham (Special Needs) Guides and Rangers both raise concerns about the potential effect on the Girlguiding Nottinghamshire Elton/Orston Guides campsite. Girlguiding Nottinghamshire believes that it would result in the total and unacceptable loss of this facility, whose benefits are outlined – including that more than 800 young people and leaders camped on the site in 2018 and 2019. Girlguiding Nottinghamshire believes that the additional housing could be

better accommodated in one of the more urban alternative development options.

Nottinghamshire Wildlife Trust objects to the potential development within R05 on the basis of: impacts on Local Wildlife Sites (LWS) including Orston Quarry and Grasslands, and Orston Railway LWS; impacts on the Orston Plaster Pits Site of Special Scientific Interest; intrusion into countryside; and because it is within the River Smite Focal Area.

Summarised comments from local residents

Responses and a petition were received from a total of around 440 local residents, residents groups or others objecting to potential major development within R05, with a range of views expressed in opposition to potential development and many reflected in those points made by Orston Parish Council and Elton on the Hill Parish Meeting.

Those views commonly mentioned by residents include the following. The land is greenfield within an area of significant beauty and a conservation area of great historic importance, including for archaeology. That delivery is uncertain because of need to redevelop road and drainage infrastructure and local services. Orston had its worst flooding in living memory in 2020 and development would increase local flooding. It would create a 'commuter suburb' because there is no accessible major employment sites locally, which would lengthen commuting and increase greenhouse gases, making it harder to achieve carbon neutrality by 2028. The site is not of an adequate scale or strategically suitable to be a garden village as there is insufficient land to support the range of supporting uses required, it would not offer re-use previously developed land redevelopment, job opportunities, community infrastructure, schools or community assets. It would harm the setting of the Orston Conservation Area setting. The A52 is heavily congested and dangerous, especially the Elton junction. There would be extra traffic through villages on unsuitable roads. There would be disruption to the Site of Special Scientific Interest site. The development would be visible from walks along the Smite and many other places. The development would destroy reasons for living in the countryside.

Many residents advocate the urban intensification growth strategy, as focusing development within and adjoining the Nottingham main built up area will make best use of Nottingham's many brownfield sites and protect greenfield sites, and allows for housing delivery in locations with access to job markets, use of existing infrastructure and emerging transport networks. Whereas, they contend that R05 site offers no such benefits.

A number of residents question the adequacy of public transport provision locally to support development, including to make the point that rail services

on the Nottingham to Grantham line are limited and especially so outside peak hours. A number also highlight the existence of solar farm within R05 and question the wisdom and foresight, including in respect of achieving carbon reduction goals, of its removal to make way for housing development.

The potential for the Vale of Belvoir to be designated as an Area of Outstanding Beauty is another reason mentioned why development would be unsuitable. The presence of Girl Guides campsite is another reason mentioned. One Rushcliffe resident believes does not believe development of R05 would pass a Strategic Environmental Assessment test, and any cost benefit analysis would immediately rule such a garden community out of consideration.

A small number of residents, while not necessarily supporting the principle of development, suggest ways in which development might be made more acceptable, including to scale down the extent of development and to 'green' it.

One respondent supports the development of R05 ahead of options closer to Nottingham. It is argued that should be a preferred location because it would leave a gap between the city and the development, meaning that the city is buffered from these developments and an urban sprawl is avoided.

6. **R06 Radcliffe on Trent Extension**

Summarised comments from statutory organisations:-

Radcliffe on Trent Parish Council consider that RO6.1, [Shelford Road], would be a skyline development and degrade the landscape on the Southern side of the Trent Valley. Furthermore, it considers that the slope has already presented problems whilst in agricultural use, with water run-off from heavy rainfall causing erosion of the cliff bank and contributing to flooding of the land below, which is a local wildlife site. In relation to RO6.2, [Hall Farm], the Parish Council considers that it is an extremely large piece of land that includes a woodland area, planted approximately 30 years ago as part of the National Forest. Overall, it considers that Radcliffe on Trent is unsuitable for further development due to the very poor existing infrastructure and the constraints on the single carriageway A52.

Saxondale Parish Meeting consider that more dispersed growth along the A52 corridor should be avoided. In particular, it considers that development around Saxondale and surrounding settlements should be avoided as heavy congestion and limited rail services.

Summarised comments from developers:-

Barwood Homes observe that Broad Area of Search R06 ('Radcliffe on Trent Extension') has been assessed as having a "high potential area for strategic growth", even though it includes site R06.1, which is assessed as 'potentially unsuitable'. It questions the assessment scoring as currently suggested in the published Growth Options Study.

Jelson Homes and the Wheatcroft Family state that the Radcliffe on Trent Extension (reference R06) is fully supported. The settlement should be extended towards the south where there is excellent potential to create a highly accessible and sustainable, mixed use development within a defensible landscape boundary. Other land to the north and west of Radcliffe on Trent is constrained by flooding and topography

Samworth Farms agree with the conclusions of the Growth Options study. It considers that its land to the east of Radcliffe on Trent has potential for growth. It states that the site could deliver around 700 homes, and is liaising with the landowner to the north of the site if a larger area is considered to be appropriate.

Summarised comments from other organisations:-

Together with other sites across the plan area, the **CPRE** state that the site R6.02 is unsuitable for development. It refers to a number of constraints that may apply to this and other sites that it objects to.

The Leake Ward Members consider that to the east of Rushcliffe, a combination of R06, R02, R03, R04, R05 could extend a near-continuous built-up finger from Nottingham miles out into the open countryside more than half way to Grantham. They consider that fingers of development need to be consciously broken up for visual impact, separation of communities, and to provide wildlife corridors across the development.

The Nottinghamshire Wildlife Trust object to the locations at R6.01 and R6.02. For R6.01, the councils need to consider the cumulative impacts with the approved development south of the proposed site. They consider that R6.02 represents a major intrusion into the wider countryside and breaches the barrier formed by the A52. They have also highlighted potential impacts on features of nature conservation importance for both sites. Finally, for R6.01, they state that the biodiversity opportunities mapping identifies the opportunity to create woodland on the escarpment to the north of the site.

Summarised comments from local residents

One comment suggests that together with a number of locations R07 should be a development zones with a mixture of residential, retail, industrial and office sites. One comment suggests that this location has one of the best connections for development. One comment states that R06.1 is a small development which if sensitively designed could sympathetically fit into the rural landscape. In addition, they state that additional building adds to the need to upgrade the infrastructure, and point out that Shelford Road is a narrow country road.

Conversely, some comments disagree with development along the A52 corridor and at Radcliffe due to traffic and infrastructure concerns. Some comments state that development would lead to further erosion of the green belt in this location. One comment states that R06.2 on the South side of the A52 should not take place. The A52 is a main transport corridor and any additional turnings should be avoided. A couple of comments consider the area to be isolated.

One comment states that the evidence in the Growth Options study for R06 is inaccurate, misleading and conclusions lack contextual understanding. In particular, there are inconsistent conclusions regarding Radcliffe on Trent primary school (page 45 and page 48). Page 43 should recognise that the delivery of a health centre at Shelford Road is not yet certain. Page 48 – A52 should be recognised as a barrier to integration, not as an ‘anchor’. Page 104 Radcliffe on Trent primary school does not have two primary schools – one is infant and one junior. Fails to take account of local topography, and consequential impact on travel mode preferences. It fails to acknowledge the impact of the A52 as a barrier to intra-village movement. At Radcliffe on Trent primary school it fails to consider the location of existing community infrastructure, travel patterns and options for the ability to access potential new or improved community infrastructure.

7. R07 Gamston

Summarised comments from statutory organisations:-

Holme Pierrepont and Gamston Parish Council (HPGPC) state that site R07.1 should never be brought forward for development as it is within the functional floodplain. It also includes the popular Regatta Way Sports Ground and is ideally suited for recreational use. HPGPC also oppose locating schools on this site due to these constraints. HPGPC state that sites R07.2 and R07.3 cannot be linked with Gamston due to the A57. They are dependent upon infrastructure within neighbouring allocation being delivered and will engulf the settlement of Bassingfield. In addition, the site is liable to flooding, there are no facilities, nor major commercial premises, and development would erode the Green Belt between Radcliffe on Trent and the main urban area.

Sport England state that, in accordance with the NPPF, the playing field within R07.1 should be protected or full site/facility replacement provided prior to any loss. If the facility is retained the impact of housing around the playing field would need to be addressed.

Tollerton Parish Council state that the broad areas of search fail to include the potential for a new form of regeneration in town and city centres. It believes that R07 is not appropriate without significant further improvements to existing road and junction capacity, new off road cycling provision and traffic calming/green lane measures.

Nottinghamshire County Council (Minerals and Waste) highlights that, in relation to minerals, this broad areas lies within the MSA/MCA for sand and gravel. As per National Policy (Paragraph 204) and Policy SP7 in the emerging Nottinghamshire Minerals Local Plan, if this site was to be taken forward within the Greater Nottingham Plan, it will need to be demonstrated that development here will not needlessly sterilise mineral resource and there is a clear need for non-mineral development in this area. If this can be demonstrated, prior extraction will also be sought where practical and so any proposed development will need to demonstrate this has also been considered and if found not to be practical nor viable, why this is the case.

Summarised comments from developers:-

Barwood Land (landowner of R07.2 and R07.3) supports the Growth Study's conclusions that R07 is capable of delivering an urban extension in conjunction with the East of Gamston/North of Tollerton SUE. The A52 strategic Green Belt boundary has been breached with the allocation of the Gamston SUE and allocated land to the north would not materially alter the level of expansion that has already occurred. R07 can be delivered as a stand-alone development and is physically distinct from the allocated site due to location of Grantham Canal and independent highways access can be achieved. The Broad area of search for R07 should be re categorised from "potential area for strategic growth" to "high potential area for strategic growth". The limitations of R07.1 bring down the score for R07.2 and R07.3 which are the more sustainable parcels. Green Belt, landscape, flood risk and impacts on Bassingfield can be mitigated.

Croft Development Ltd believe that its 'Land at Simkins Farm should be included within R07.1. Land at Simkins Farm is available and suitable for development and does not have any significant constraints which would prevent development. The land has an excellent relationship with the built area of West Bridgford, immediately to the west, as well as Gamston and the wider R07 broad location area to the south. The Greater Nottingham Growth Option Study (AECOM, July 2020) positively assesses Area 3 (within which this site is located).

Taylor Wimpey highlights the opportunities to deliver sustainable development on the edge of the main urban area and support the allocation of R07. Taylor Wimpey controls land within R07.3 and consider growth in this location is appropriate being well connected to existing and emerging development.

Davidsons submission relates to areas R07 and R11. The submission is summarised under R11.

Nottingham County Council (landowner of R07.1) support the allocation of R07.1. In relation to minerals, R07.1, R07.2 and R07.3 are all within the Mineral Safeguarding and Consultation Areas for sand and gravel. If these sites were allocated, it will need to be demonstrated that development here will not needlessly sterilise mineral resource and there is a clear need for non-mineral development in this area. If this can be demonstrated, prior extraction will also be sought if practical to do so.

Summarised comments from other organisations:-

A Rushcliffe Borough Councillor for Leake believes that R07.2 and R07.3 should be allocated, as well as or possibly instead of the current allocation at Gamston which appears to have stalled and may be undeliverable in the timescale required, but should be retained for development as soon as is feasible. If they are not allocated they should be safeguarded.

The Nottinghamshire Wildlife Trust objects to R07.1, R07.2 and R07.3. R07.1 is adjacent to Grantham Canal and Gamston Pits Local Wildlife Sites (LWS). Half this site is within unprotected flood zone 3. R07.2 and R07.3 comprise a major intrusion into the wider countryside and cumulative impacts with adjacent existing core strategy strategic sites should be considered. They also breach the natural border constraint created by Lings Bar Adjacent to Grantham Canal LWS and Gamston Pits LWS.

TABU (Tollerton Against Backdoor Urbanisation) do not support the allocation of R07 stating that development should be located north of the River Trent, or if within Rushcliffe, along the A453 or A46 (Parkway, Gotham, Bingham and Radcliffe on Trent).

The Regatta Way Sports Club and Rushcliffe Green Party have objected to the allocation of R07.1 due to the land's location within a flood zone and the loss of the sports facility. Both of which are contrary to the plans objectives. An online petition objecting to the loss of the Regatta Way Sports Ground has been signed by more than 6,000 people (<https://www.change.org/p/nottinghamshire-county-council-save-regatta-way-sports-ground-from-developers>).

The Rushcliffe Green Party also oppose the relocation of the school to R07.1 due to the congestion this would cause. It also objects to the allocation of R07.2 and R07.3 where Grantham Canal provides a defensible limit in Local Plan and is a wildlife corridor and GI asset.

Summarised comments from local residents

A significant number of local residents opposed the allocation of R07 as a strategic site and location for a primary and secondary school, specifically R07.1.

Many of the local residents highlighted the site's Green Belt status (and benefits it brings to wildlife and the prevention of Lady Bay, Gamston and West Bridgford merging), increased traffic and congestion (particularly along the A52 which is single carriage way between the Gamston Lock and Wheatcroft roundabouts, and A6011), absence of any rapid transit system, loss of wildlife habitats, noise, pollution, the change in both rural character and local identity of Lady Bay and Gamston, and loss of recreational green space as constraints. Impacts on Tollerton (traffic) and Bassingfield (loss of identity as a village) were also raised by residents.

A number of residents favoured the development of brownfield land, rather than urban extensions (sprawl) on green field sites. Others suggested this area should be focus for recreational and habitat improvements to address health and well-being issues, climate change and increase biodiversity.

Specific concerns regarding R07.1 from residents noted flood risks (which would be increased by development), impacts on the village feel and community, loss of sports facilities and recreational space (which is contrary to the plans objectives and must be replaced), and the need for and inappropriateness of locating a primary and secondary school (traffic, parking and flooding).

A number of residents believe that the site's location adjacent to the main urban area, existing allocation and A52 are positive factors that enable access to the highway network, employment areas, services and facilities. Connections to the canal and other green infrastructure were also highlighted as positive factors. R07.1 is considered an infill plot.

8. **R08 Cotgrave**

Summarised comments from statutory organisations:-

Tollerton Parish Council state that the broad areas of search fail to include the potential for a new form of regeneration in town and city centres such as

that currently being pursued in Coventry South in the West Midlands Combined Authority.

It states that together with other sites, those at Cotgrave are not appropriate without significant further improvements to existing road and junction capacity, new off road cycling provision and traffic calming/green lane measures.

Summarised comments from developers:-

Barwood Homes support the development option at part of the Cotgrave East broad location, in particular land west of Hollygate Lane (north of the canal). They consider that their site has the capacity for around 90 dwellings and that the impact of development can be mitigated. They note the positive aspects identified in the Growth Options study, but disagree with the conclusions in relation to economic development and regeneration conclusions in relation to Cotgrave. As a result, they consider that Cotgrave has high potential for strategic growth. In addition, they state that whilst the site was identified as low to medium importance in the Rushcliffe Green Belt review (2017), the assessment was too pessimistic when assessed against the set criteria. Their submission is supported by a number of technical documents, including an initial concept plan.

Barratt Davis Wilson also support growth towards the Cotgrave East broad location where they have land interests which they consider is suitable available and deliverable, with no technical constraints.

The Commercial Estates Group and Mather Jamie consider that land south of Cotgrave should be considered for employment led mixed use development. It understands that this option was not assessed as part of the growth options study as it was employment-led. They support a dispersed pattern of growth, including growth at Cotgrave. They consider that growth utilising the A46 corridor has been overlooked within the growth options to date, and that the corridor is more attractive since the improvements to the A46 have been undertaken. It highlights that the Midlands Connect 20-year Strategic Economic Case (November 2018) for the A46 Corridor, confirms that the corridor has significant manufacturing logistics and agricultural sector services growth potential.

They state that employment led development at their site may help address the deprivation issues within Cotgrave by providing for local jobs. Furthermore, they highlight that they have cited the provision of a skills based centre at Leeds as an example of where they have provided for an employment and skills training centre as part of development. Finally, they state that the freehold site is immediately available and could be reasonably delivered within the next five years, and that Commercial Estates Group

have a long track record of delivering high quality small and mid-box industrial units.

IM Land consider that the land west of Cotgrave is most suitable for development given their response to the overall strategy, together with the lack of constraints in this particular location.

Langridge Homes consider that amongst the growth options, a transport led option should be followed. As part of this option, the Bingham- Cotgrave transport corridor, is served by rail and bus services, and has benefited from road improvements (such as the dualling of A46). It considers that whilst Cotgrave has witnessed significant growth in recent years, it considers that Cotgrave has the infrastructure capacity to accommodate further growth.

In addition, it considers that its site west of Main Road is appropriate for growth for circa 120 dwellings and should be included within the broad area of growth. In terms of the sites deliverability, it states that the site is in the single ownership of Langridge Homes Ltd. Furthermore, it considers that given its proximity to local facilities, the land nearest to the village core would be suitable for specialist housing, potentially incorporating single storey bungalows for elderly persons and this would do much to mitigate the immediate heritage concerns raised in the Councils SHLAA. The submission is accompanied by an illustrative masterplan. A number of landowners represented by Oxalis Planning support development across a wide range of settlements large and small, including at Cotgrave.

Parker Strategic Land support growth at Cotgrave, and consider their land of Colston Gate is suitable and available for development.

Summarised comments from other organisations:-

The Leake Ward members state that if there is a need to release sites for development, then sites at Cotgrave (amongst others) should be considered for release, or be identified as safeguarded land.

British Gypsum states that R08 lies within the potential gypsum resource zone, but due to the presence of Clipston and Cotgrave village this area is not worth protecting from a mineral sterilisation perspective as the area would not be workable.

The **Nottinghamshire Wildlife Trust** objects to this location and identifies a number of issues. For Cotgrave East, it identifies potential impacts on the Grantham Canal and Cotgrave Colliery Local Wildlife Site. It also identifies that the area is part of the Cotgrave Forest Focal Area and that the area contains semi improved calcareous grassland. For Cotgrave West, it states that the area is a known location for protected species. For both areas, it

states that there are opportunities to enhance woodland plantation and provide woodland creation and habitat connection.

Summarised comments from local residents

A number of respondents are against additional development at Cotgrave and R08 in general, Concerns relating to traffic and inadequate roads, impact on wildlife, footpaths and bridleways, flooding, the loss of Green Belt land, a lack of reliable and frequent bus services and pressure on local schools and services are raised. Some comments state that the growth options around Cotgrave were discounted during the development of Local Plan Part 2. One comment states that there is no secondary school. One comment suggests that there is still an area of brownfield land available at the former Cotgrave Colliery.

One comment cites a recent increase in crime in Cotgrave. Another comment states that there has been inadequate consultation compared to the extensive consultation on Local Plan Part 2 for Rushcliffe. One comment states that development in this location would lead to further erosion of the Green Belt.

One comment suggests expansion at R08, amongst other places would be less sensitive than locations such as G01, G06 and R13. Another comment supports growth here alongside numerous other places. A couple of comments support this option as there would still be a buffer between the city and the development. One comment states that with increased demand for rural living as a result of Covid, this location may be suitable. A couple of comments state that these broad areas extend the village of Cotgrave which would need additional infrastructure to accommodate an increase in population. Furthermore, they state that whilst there is some employment in Cotgrave, the majority of residents would need to travel to work. Both sites have good access to the A46. One comment states that whilst other sites and areas in Rushcliffe are preferable, the areas at Cotgrave benefit from public transport connections to West Bridgford and Nottingham.

Focussing on Cotgrave West, some comments state that there also followed a planning application for part of the Cotgrave West site which received nearly 300 objections based around eroding of the green belt separation to Clipston, Traffic concerns inside and outside the village as well as additional stress to the already stretched social infrastructure the village can support.

For R08.2, additional comments state that Woodgate Lane is narrow, would need widening and this would lead to a loss of a wildlife rich hedgerow.

9. **R09 Langar Airfield**

Summarised comments from statutory organisations:-

Nottinghamshire County Council identify part of this site within the Mineral Safeguarding and Conservation Area for gypsum. If this site was to be taken forward within the Greater Nottingham Plan, it will need to be demonstrated that development here will not sterilise mineral resource and that there is a clear need for non-mineral development in this area. If this can be demonstrated, prior extraction should also be sought where practical.

In relation to waste, the northern boundary of the proposed site abuts permitted waste management operations including metal recycling. If development was to occur within this area, environmental impacts could pose a sterilisation risk to the permitted waste facility. If proposed, the County Council request further discussions on this site. It is also recommended that Glen Barry Metals, are involved with these discussions.

Sport England note that this site is the home of Skydive Langar. It is unclear if there is an alternative venue in the East Midlands where full time sky diving could take place. Consequently, this site may have regional significance for skydiving.

Summarised comments from developers:-

John A Wells Ltd state that the site presents an opportunity to deliver a sustainable new garden village outside the green belt to help meet the housing needs for the Nottingham HMA over the plan period and beyond. The blank canvas offered by the site would enable the new village to be developed with its own character and identity with high sustainability aspirations, including a full range of services and facilities, significant areas of green infrastructure and improvements to public transport provision.

Summarised comments from other organisations:-

The **CPRE** considers this site unsuitable for housing.

A **Rushcliffe Borough Councillor for Ruddington** believes that a stand-alone settlement (such as at Langar) is the only viable option, should a dispersed growth strategy be selected. This would provide a sufficient scale of development to deliver infrastructure, unlike smaller dispersed developments.

The **Borough Councillor for Leake** also favours this site as it is previously developed land and the site could provide a sustainable mix of employment and housing (including live/work units) within a new rural settlement.

Nottinghamshire Wildlife Trust objects to the inclusion of this site as it contains multiple Local Wildlife Sites and protected/priority species. The Biodiversity Opportunity Mapping Report identifies the area as providing opportunities to improve and connect habitats that benefit Grizzled Skipper. The recreation and diversification of grassland on Langar Airfield is also highlighted as an objective. It is also within the Pondscape phase 2 area.

Summarised comments from local residents

A number of residents preferred the creation of a new garden village/towns and some specifically supported Langar as it is brownfield and would provide the number of houses on the scale required to deliver sufficient infrastructure, which was deemed essential to ensure it is sustainable. The maintenance of a buffer between the existing urban area and sites such as R09, which prevented urban sprawl, was also highlighted.

Some residents however, highlighted the absence of any infrastructure at Langar and its isolated location from Nottingham as a significant constraint.

10. R10 West of Sharphill Wood

Summarised comments from statutory organisations:-

No comments from Statutory Consultees

Summarised comments from developers:-

John A Wells Ltd are promoting the site as a new retirement village that will meet the needs of the area's aging population whilst deliverable landscape and biodiversity benefits through the expansion of the community park. It considers the A52 provides a robust Green Belt boundary, highlight the land's low Green Belt importance (as identified within RBC's Green Belt Review), and encourage a fundamental review of the Green Belt which takes into account the need to promote sustainable development. It also considers: the AECOM is inconsistent in its assessment of this site and specifically disagree that the site is below the threshold for a strategic site; that it represents sprawl and merging; and that local congestion on A52 should specifically constrain this site.

Mr and Mrs Myles, as landowners, promote their site on the edge of west Bridgford for development given its location within A52 as preferable as this trunk road comprises a clear defensible Green Belt boundary.

Summarised comments from other organisations:-

Nottinghamshire Wildlife Trust objects to the inclusion of this site, which includes undelivered mitigation from the existing adjacent core strategy strategic sites. The Greater Nottingham Partnership must consider the: cumulative impacts with adjacent existing core strategy strategic sites; impacts on the adjacent Sharphill Wood and Wilford Cemetery Local Wildlife Site; and potential loss of land that has previously been recommended as part of Sharphill Community Park – it should be demonstrated that this is no longer required before inclusion.

The Rushcliffe Green Party and The Friends of Sharphill Wood object to the allocation of R10 due to the adverse effects on the biodiversity of Sharphill Wood. An effective buffer must be maintained around the wood. The Friends of Sharphill Wood have recommended that land west of the wood (R10) be designated a Local Green Space as it is an important area of accessible natural greenspace.

The Sharphill Action Group is opposed to R10 which is valued Green Belt that supports wildlife and recreation. The land prevents the merging of West Bridgford with Ruddington, scores poorly for accessibility/connectivity (according to the Tribal Study), and has important landscape value. Development of the site will have adverse effects on Sharphill Wood Local Nature Reserve and the importance of area recognised in the Core Strategy's Sustainability Appraisal.

Summarised comments from local residents

Residents opposing the allocation specifically highlighted: loss of valuable and accessible open space (Green Infrastructure) for informal recreation (walking and the enjoyment of countryside); harm to the Green Belt (which prevents the merging of Edwalton with Ruddington); loss of a wildlife corridor and impact on Sharphill Wood Local Nature Reserve; its sloping topography and visual impacts; distance from local serviced; proximity to and increased congestion on the A52, pollution and distance from public transport routes where identified as constraints.

The merging of West Bridgford with Ruddington was also highlighted as a concern.

Residents that supported the allocation stated that site's location adjacent to the main urban area and existing strategic site, within the A52 boundary, were a positive factor.

11. **R11 West of Tollerton**

Summarised comments from statutory organisations:-

Sport England object to any allocation at Edwalton Golf Course (R11.1).

Tollerton Parish Council objects to the R11 growth zone on the basis of concerns about an urban concentration strategy and the requirement for significant investment in the existing road network, new off road cycling provision, traffic calming measures and expansion of local facilities and infrastructure. The ward members for Leake would like site R11.1 to be considered for future development, given its current safeguarded status, but would wish to see some of its green space and wildlife value protected. Nottinghamshire Wildlife Trust object to inclusion of site R11.1 citing the need for it to be demonstrated that the golf course is surplus to requirements, or the requirement for it to be replaced by an equivalent or better. It also stresses the need for it to be considered alongside neighbouring sites in order for cumulative impacts to be assessed. It also highlights the site is habitat to protected species, including grass snake, and highlight it as a potential for a Local Green Space designation. Nottinghamshire Wildlife Trust also object to R11.2 stating it would represent a major incursion into the countryside and breaches a defensible boundary (the A52 Lings Bar).

Summarised comments from developers:-

Richborough Estates support development in this location as promoters of site R11.3 and also put forward an additional site to the west of Tollerton as part of their representation. It supports identification of R11.3 citing its sustainability credentials and lower Green Belt value. It highlights the lack of environmental and heritage constraints, the good accessibility of the site due to the proximity of the urban area and the neighbouring strategic allocation. The representation supplies additional master planning and landscape impact assessment.

The Harworth Group support development in the Tollerton area but suggest a reconfigured growth zone area that includes their landholding “Land north of Melton Road, Tollerton”. It argues that this site is more appropriate than sites R11.1 and R11.2 which would lead to coalescence with Tollerton. It argues that R11.2 has identified deliverability risks linked to the lack of current progress on the strategic allocation to the north and the requirement for this to be built out before R11.2. It considers the Growth Options Study settlement analysis neglects the potential of lower order settlements to transform their role, function, level of services and accessibility through development. Development at so called “other settlements” could help achieve a critical mass in terms of the attributes assessed in the Growth

Options Study and could enable them to reach “key settlement” status. It is concerned that the Growth Options study does not consider this possibility.

Davidsons Developments are supportive of development in the R11.2 site as developers with an option on the land (“land to the South of Gamston/North of Tollerton”). It identifies it can bring the site forward independently and quickly, providing access to enable delivery of the allocated SUE to the north.

Rushcliffe Borough Council as landowners of Edwalton golf course support redevelopment of part of the site for housing development. It cites its sustainable and accessible location as reasons for suitability of the site for redevelopment.

Summarised comments from other organisations:-

The Edwalton Municipal Golf and Social Club object to site R11.1 due to the loss of an important recreational facility and the health benefits associated (including walkers, cyclists and golfers), the ecological value of the site for wildlife, its function as a natural floodplain, the importance of the mature trees to the east of the site which screen the A52 and the lack of suitable access.

Tollerton Against Backdoor Urbanisation (TABU) object to any development that would lead to coalescence and compromise the identity of Tollerton as a village.

Summarised comments from local residents

A small number of respondents objected due to the loss of Green Belt and the coalescence with Tollerton and West Bridgford/Edwalton and the need to preserve the identity of existing settlements. They also raised concern with the increase in congestion on a main route into the city. A small number of residents also object on the basis of the scale of recent developments in proximity to the area and the impact this is having on services and infrastructure. A small number object on due to the health impacts due to pollution generated along the A52 and the lack of sustainable transport modes (e.g. tram).

12. R12 Ruddington Extension

Summarised comments from statutory organisations:-

Ruddington Parish Council (RPC) and the ward councillors for Ruddington object to all sites identified under the growth zone. RPC is concerned that the consultation document fails to take into account the

existing housing allocations made through Local Plan Part 2 stating the critical importance of any future growth plans to take into account committed allocations and their impact on existing infrastructure provision. RPC also expects the plan to be reviewed in order to take account of any implications of Covid 19 and resultant changes to lifestyle patterns due to lockdown. It also raises concern that the maps on page 97 and 98 show different site referencing for R12.3 and R12.4. (**Bradmore Parish Council** also raise this issue). It objects on the basis of the lack of infrastructure to support the scale of development citing the inadequacy of the local road network and resultant congestion, lack of car parking in the village and the lack of capacity of medical services and primary school capacity in the village.

Site specific objections to R12.1 and R12.2 from the Parish Council and ward councillors relate to coalescence with the strategic allocation land south of Clifton, the ecological impact on the Fairham Brook Nature Reserve (which runs across and along the site) and the detrimental impact on protected species, specifically the Cream Bordered Pea Moth, the site's location in the floodplain, including part of Flood Zone 3, and the distance of the sites from key facilities (including schools, the nearest tram stop and the village centre), citing all lie further away than Department of Transport guidelines of walkable distances. Site specific objections to R12.3 related to the proximity of the country park and potential negative ecological impact on it, the loss of Green Belt and concern that the plans failed to show the recently permitted developments. Site specific objections to R12.4 related to coalescence with Edwalton and Tollerton, the scale of development., the site's location in the floodplain and the distance of the site from key facilities (including schools, the nearest tram stop and the village centre), and the significant loss of Green Belt.

Tollerton Parish Council object to the overall growth zone due to the lack of capacity on the road network and the need to develop more sustainable transport infrastructure e.g. off road walking and cycling. The ward members for Leake highlighted that this growth zone would lead to coalescence with Nottingham city. Bradmore Parish Council state the document fails to demonstrate the exceptional circumstances required by the NPPF for taking this land out of the Green Belt.

Bradmore Parish Council object to site R12.3 due to the scale and the consequent negative impact it would have on Bradmore due to: coalescence and loss of local identity and character (including impact on the historic character of the village), loss of Green Belt (and failure to demonstrate very special circumstances) loss of high quality agricultural land (which would be contrary to NPPF), loss of an area with recreational and wildlife value, poor existing transport infrastructure, in particular lack of public transport within walking distance and infrequency of existing service (and consequent increase in traffic congestion) and increased risk of flooding. It argues that identification of the site, which due to its location and the issues highlighted

above in respect of connectivity, is contrary to the overall plan objective for carbon neutrality. The Parish Council also disagree with the Growth Studies assessment of the site in relation to its consideration of the impact on heritage and queries the report's suggestions that there would be opportunity to upgrade the Great Central railway mainline due to the cost associated with this. It also raises concern that the study failed to acknowledge the existence of high voltage power lines that run across part of the site.

Summarised comments from developers:-

Oxalis Planning, Bloor Homes and Pegasus Group support a growth strategy that includes a proportion of development adjacent to some of the more sustainable villages, citing Ruddington as one such suitable settlement. **Taylor Wimpey** also support development in this location, specifically R12. 1 which it states is suitable due to its good accessibility in terms of public transport and proximity to SRN and the city centre. Taylor Wimpey argue it does not meet the purposes of the Green Belt as set out in NPPF and is therefore suitable for release. It confirms this land is in their control. Pegasus cite the Growth Study's report positive findings in terms of connectivity and employment. As part of their representation Pegasus suggest an additional site "Land to the West of Loughborough Road is included in the development zone. It considers this could be included independently or as part of Site 12.3 Land East of Loughborough Road. It argues it is available, suitable and achievable.

The landowners (Michael Machin, Gaintame Limited, Wheatcroft Farm Limited and John A Wells Limited) support the inclusion of R12.4 "Land south of Wheatcroft Island". They consider that the entire 112-hectare site should have been classified as a single entity in the AECOM study and the entire site (not just half) should be considered suitable for development, arguing the eastern part of the site does not give rise to any possibility of coalescence between Edwalton and Tollerton due to the situation of the railway embankment. They also consider the site should be considered as a standalone site, and not as an extension to Ruddington. They argue to relate more appropriately to the local plan allocation at Melton Road that is currently built more than it does to Ruddington. A standalone settlement would have its own services and facilities and would not be reliant on the existing services within Ruddington centre. Their submission includes a masterplan and further information on required highways improvements. They stress the sustainability credentials of the site in terms of the location in adjacent to the main urban area and the highways junction improvements that are scheduled to take place. They consider it realistic for 2500 dwellings to be delivered on this site in the plan period but suggest any further land should be removed from the Green Belt now and safeguarded for future development beyond the plan period.

The Hill Family support development at R12.2 “Land at North Road, Ruddington” and the R12 broad growth area. They highlight the positive appraisal of the site in the AECOM study in terms of it being assessed more highly accessible and being of lower Green Belt value than strategically more valuable areas. They query the study's conclusions on flood risk, geo - environmental in regards to contamination and its identification of an area of ancient woodland in the vicinity. It also considers the scoring should be altered in regards to Heritage and Geo-Environmental factors. It also queries the emphasis given to rail linkages in respect of consideration of Transport.

JG Woodhouse & Sons propose a reconfigured broad area merging R12.3 and R12.4 and including an additional area of land in between these two sites. This is shown in a Vision Document submitted with representation. The developable area is inclusive of 96ha for residential development which provides approximately 3500 – 4000 homes, a 2ha site for a District centre, two Local Centres at 0.5ha each, three 2ha Primary Schools and a potential site of 10ha for Secondary School. The vision document includes two potential development masterplan options. They highlight the AECOM study's positive appraisal of R12.3 and R12 .4 and their assessment as being “potential suitable” as opposed to the other areas in Ruddington (R12.1 and R12.2) and their assessment as “potentially unsuitable”. They argue this justifies the development of a growth area to the east of Ruddington.

Braemore Group and Mr Knibb consider their 21.4 hectares site on both sides of Wilford Road to the south of West Bridgford is an appropriate site for new growth and a unique opportunity to provide a high-quality sports facility for the local community, including for West Bridgford Hockey Club, and housing in a highly sustainable location. It is also considered that the loss of this land from the Green Belt would be of lesser detriment than other Green Belt release options in the vicinity, and would avoid coalescence with the Ruddington urban area due to the presence of Ruddington Grange Golf Course. On the basis that the land is available and suitable, it is request that the site be considered as a serious growth option.

Summarised comments from other organisations:-

Nottinghamshire Wildlife Trust objects to all sites identified under the R02 zone arguing they constitute a major intrusion into the countryside when considered alongside existing Local Plan strategic allocations. It also objects due to the potential impact on biodiversity citing the location of the Fairham Brook Nature Reserve LWS, Ruddington Disused Railway LWS and railway corridor and wider wildlife corridors and the need to preserve protected species. It also identifies the need to refer to the recommendations of the Biodiversity Opportunities Mapping report for each site.

Summarised comments from local residents

Members of the public opposing the zone specifically highlighted the lack of infrastructure within the village of Ruddington to support the level of growth (including insufficient capacity at the medical centre and schools), lack of car parking within the village, insufficient capacity on the local road network and increase in congestion, loss of strategically important Green Belt, impact on local identity due to coalescence, areas of the zone being situated in Flood Zones 2 and 3 and the ecological impact on Local Wildlife Sites, including the Rushcliffe Country Park, Fairham Brook and Wilwell Farm Cutting. A number of respondents also stressed the importance for the new plan to take account of the high level of growth planned for the village through the existing local plan and the need to account for the impact these will have on existing infrastructure. Some also queried the lack of justification for the scale of growth. Some also made part of their objection on the basis of the strategy running contrary to the climate change objectives. Concern regarding the health impacts of the pollution generated from vehicles using the A52 was also raised along with the need for more sustainable transport options in the area e.g. tram.

13. R13 West Keyworth

Summarised comments from statutory organisations:-

Nottinghamshire County Council identify sites R13.01, R13.02 and R13.03 as within the Mineral Safeguarding and Conservation Area for gypsum. If these sites were to be taken forward, it will need to be demonstrated that development within them will not sterilise mineral resource and that there is a clear need for non-mineral development in this area. If this can be demonstrated, prior extraction should also be sought where practical.

Keyworth Parish Council (KPC) considers the growth options to be fundamentally flawed in two respects. The first too much land is removed from the Greenbelt for further housing in Rushcliffe Borough and, in particular, Keyworth. The second that, in allocating significant further housing, the lack of commitment to deliver accompanying investment provision for infrastructure (transport links) and services (health, education and amenities). If the arguments put forward by KPC are not followed and proposals are still made to allocate further development on Greenbelt land in Rushcliffe, and in particular around Keyworth, there is then a need to ensure additional infrastructure and health/education/amenities are guaranteed in parallel. There are a number of pinch points on roads into and out of Keyworth, which need improvement, and a new access to the village direct such as a multi modal route from Wheatcroft Island to Bunny Lane by-passing Plumtree is proposed. KPC identifies that the current medical

practice in Keyworth will need to be expanded to serve the enlarged community. KPC argue that commercial/industrial development may not be viable because of a land price premium for a site for residential development in Keyworth, which KPC believes is evidenced by no full application coming forward for the Platt Lane, Keyworth employment allocation.

Tollerton Parish Council state that R013 is not appropriate without significant further improvements to existing road and junction capacity, new off road cycling provision and traffic calming/green lane measures.

Summarised comments from developers:-

Aldergate Properties Ltd support of R13.2, which it is promoting. It highlights the lands performance against Green Belt purposes in both RBC's Green Belt Review and the BLUP review that supported the Neighbourhood Plan. It also highlights its own assessment of landscape impacts which concluded a low landscape and visual sensitivity. In summary it is a sustainable extension to a Key Settlement.

Barratt David Wilson Homes consider R13.3 a logical extension of Hillside Farm (allocated in the Local Plan). Keyworth is a Key Settlement that can accommodate continued planned expansion.

CEG Land Promotions Ltd state that R13 is neither appropriate nor justified. Instead, a proportionate level of planned growth should continue at Keyworth on land abutting the allocated site at Nicker Hill in the adopted Rushcliffe Local Plan Part 2. This land is available and deliverable.

Mather Jamie Ltd state that areas of search should extend to the south of Keyworth and include land off Willow Brook. Allocated land to the south would avoid coalescence and is removed from ancient woodland at Old Wood. It does not believe it is constrained by any environmental issues.

Oxalis and Bloor Homes support development on the edge of villages, such as R13, in order to meet the Government's objectives for housing delivery. Oxalis specifically highlight the benefits of helping small and medium sized builders and delivering sites for specific housing types particularly retirement living and self-build schemes.

Penland Estates have proposed an additional site south of Keyworth off Lings Lane.

Summarised comments from other organisations:-

The Nottinghamshire Wildlife Trust state that cumulative effects of R13 and the existing allocations/developments either side of Bunny Lane should be considered.

A Rushcliffe Borough Councillor for Leake supports the land's allocation. If it is not allocated the land should be safeguarded.

The three **Rushcliffe Borough Councillors** oppose further urbanisation of Rushcliffe and with regard to Keyworth, support the comments of the Parish Council, in particular those that raise concerns about the loss of Green Belt. They are also concerned that further housing sites have been chosen without reference to the Neighbourhood Plan of community at large and that the village has provided more than 600 new homes through the Local Plan Part 2.

Summarised comments from local residents

Local residents have raised concerns that the expansion of existing settlements, such as Keyworth, will result in their character being lost (doubling its size), as well as the significant loss of highly prized Green Belt. Inadequate village infrastructure, services and facilities, loss of agricultural land, and increased congestion on the A52 were also highlighted as constraints.

The land's proximity to the A52, existing services and facilities within the village, proximity to employment and transport hubs were highlighted by some residents as a positive factor that should encourage its allocation. However, there was concern that: the scale was too large and it should be reduced to minimise urban sprawl; that it should be better connected to the existing village; and the rural character of the village must be retained.

14. **R14 Stanton on the Wolds**

Summarised comments from statutory organisations:-

Stanton on the Wolds Parish Council are very concerned about the potential for merging of villages to create a conurbation. Furthermore, it states that the land east of Stanton (R14) which has been marked down as a possible growth option is a huge area. It considers that any development there would have a big impact on traffic on the A606, quite apart from the destruction of valuable farming land and green belt. It also considers that the area has no easy public transport links to the proposed HS2 station and will lead to an increased use of cars to access it.

Nottinghamshire County Council highlights that, in relation to waste, adjacent on the northern-eastern boundary of the proposed site is the permitted waste management facility of Allsop Metals which dismantles end of life vehicles. If development was to occur within the north-east of this site, it is likely that environmental impacts would be detectable (i.e. noise) and so could pose a sterilisation risk to the permitted waste facility (i.e. noise) and

so could pose a sterilisation risk to the permitted waste facility. If this site was to progress further within the Greater Nottingham Plan, the County Council would seek to be involved within this process and discuss further the details of this site and potential mitigations that could be put in place to prevent the sterilisation of this waste management facility. It is also recommended that the operator, Allsop, are involved with these discussions and throughout the consultation process.

Summarised comments from developers:-

Mr Wilson (a landowner) supports the principle of development at Stanton on the Wolds, however he considers that land at 126 - 128/130 Melton Road, Stanton on the Wolds should be allowed for development within the next 3 years. He has consent for one dwelling, and SHLAA 577 (2017) shows a capacity of 20 dwellings. Such small sites, as per NPPF should be developed out first, rather than taking good food producing land out of production (such as R14) for development.

John A Wells Ltd own some of the land within this location, as does **Mr Herrick (landowner)**, however the land areas being promoted are different. Both consider that, their land could be bought forward for development. They consider that the land is well contained, therefore would have minimal impact on the green belt. They consider that there are other positive benefits of this location, such as access to the A46 and A606, its location convenient for Leicester, Newark and Nottingham and the potential to provide public transport. In addition, they state that the location would have the potential for the development of a standalone settlement for several thousand homes together with supporting infrastructure and facilities.

Positive Homes states that this area is not suitable as it is not connected to an existing settlement.

Summarised comments from other organisations:-

British Gypsum, state that as the area is less developed it is worth protecting to avoid sterilisation of mineral resources.

CPRE state that for a combination of reasons that may apply to a number of sites, this area is unsuitable for development.

Nottinghamshire Wildlife Trust object to the site. It states that the area contains the Jethro Farm Local Wildlife site, is within the Rushcliffe Pondscape focal area and that there are records of protected species. In addition, it states that the biodiversity opportunity Mapping indicates that there are opportunities to create new ponds in the area.

Summarised comments from local residents

Some comments state that the location is in the middle of nowhere and that there is no infrastructure to serve them. In addition, one comment states that development in this location would be taking out a decent amount of woodland and also quality farmland which is not desirable.

A couple of members of the public states that East of Stanton on the Wolds, given its good Car transport links this could "in the old fashion world" be a suitable site for a New village - but only if there was some proper infrastructure planning significant public transport improvements. In addition, they state that there are better sites that are closer to the tram. Some comments suggest that the location could be a possible garden city or garden village.

15. R15 A453 Corridor

Summarised comments from statutory organisations:-

Aslockton Parish Council state that the most preferred sites include Ratcliffe on Soar Power Station (R15.3). Radcliffe on Trent Parish Council also identify R15.3 where regeneration should be focussed.

Calverton Parish Council expresses a preference to sites close to the M1 and tram network. In respect of this location, it quotes some of the positives outlined within the Growth Options Study.

The group of Parish Councils within Gotham ward and the ward member state that they do not agree with the conclusions in relation to the area R15 in the Growth Options study. They consider that the Growth Options Study is not fit for purpose – with flawed study principles, inaccurate data in relation to constraints, and that the methodology is lacking robust analysis. They have specific concerns regarding R15. They consider that it does not have a High Potential for Growth as not all the technical information is available. In addition, they have concerns in that the Study is ‘policy off’ in relation to the Green Belt.

Specifically, whilst they acknowledge that the power station is due to be decommissioned, they object to the proposed incinerator that has been submitted as an outline planning application. This together with further development within R15 would run counter to the aims to limit the carbon footprint of the Greater Nottingham area. More specifically in relation to R15.3, they state that an autonomous settlement was proposed in West Rushcliffe in the mid 2000’s under the since-scrapped “eco towns” concept. Issues raised during consideration of this scheme included the cost securing infrastructure and rail upgrades, and the impact on existing trunk roads in and around Nottingham. These constraints will persist and need to be resolved through extensive technical evidence.

Homes England state that their site directly abuts R15. At this stage, Homes England request that careful consideration is given to how any future growth is distributed / allocated in the Strategic Growth Plan, being mindful of sites that have already been allocated in Local Plans, and where there is already an expectation of housing delivery, such as Fairham. Whilst it appreciates this is only consultation document identifying possible locations for future housing growth, it is interested to know if these sites have the potential to be allocated, and how they would integrate/ relate to Fairham (particularly in relation to R15.1).

Kegworth Parish Council wish to be consulted upon development proposals at Ratcliffe on Soar Power Station. Furthermore, it supports the creation of new employment opportunities on brown field sites such as Ratcliffe-on-Soar Power Station site and welcomes the emphasis on leading edge Science and Technology in collaboration with local universities to create skilled and well paid jobs. Brown field sites elsewhere in the City are preferred for business, industrial and warehouse use over green field sites along the A453.

North West Leicestershire District Council state that areas in Rushcliffe borough (R15.1, R15.2 and R15.3) have the potential to impact upon the environment and transport infrastructure of the locality, including the A453, M1 and A50 and the area around Kegworth in north West Leicestershire. It also queries how the deliverability of the International gateway might be impacted by growth in the southern Nottingham area. It considers that the Greater Nottingham Strategic Plan should have regard to a wider area than just that covered by the plan, including the need to take full account of the potential cumulative impact upon the wider area. Finally, it considers that under the Duty to Cooperate there would be merit in establishing a closer working relationship with the Greater Nottingham Partnership, possibly involving Leicestershire County Council and the Joint Strategic Planning Manager for Leicester and Leicestershire as well as North West Leicestershire (and possibly Charnwood Borough as well).

Saxondale Parish Meeting state that it has no preference on development sites, however note that R15 has the advantage of developments around proposed major transport hubs.

Sutton Bonington Parish Council is concerned about the proposed allocation R15. The AECOM report manages to put the A453 corridor, the Ratcliffe on Soar power station and Kingston on Soar all into the same area and category saying it all has 'high potential for strategic growth'. It considers the first two areas might but most definitely not Kingston on Soar.

West Leake Parish Meeting state that the employment growth on land to the west of the M1, together with that which is likely to occur at a

redeveloped Power Station has the potential to deliver many thousands of new jobs, the majority of which will be filled by people living in Greater Nottingham, Derby and the smaller Leicestershire towns of Loughborough, Shepshed, Ashby and Coalville.

It considers that it is important to identify and safeguard places, both settlements and their settings. It also considers that the proximity of West Leake and its setting to the Power Station and the EMA/EMG developments engenders a vulnerability which presents a challenge; how to maintain an environment worthy of protection whilst not impeding important economic growth. Places like West Leake and its rural hinterland must be protected not only from encroaching built development, per se, but also the inevitable movement of people through traffic

The inevitability of a redevelopment of the Power Station is accepted along with a focus of growth west of the motorway around the Airport (development areas R15.1 and R15.2)., but the primary consideration beyond this fundamental acceptance is the impact of such change; impacts caused by the loss of important landscapes and the introduction of extraneous traffic.

It considers that a redeveloped Power Station should be connected to Greater Nottingham sustainably, by extending the NET tram route further along A453 to the Parkway Mainline station and ultimately beyond that to EMA/EMG. The positive, beneficial relationships between built developments and transportation should be strategically predominant as Greater Nottingham continues to grow.

Nottinghamshire County Council highlights, in relation to minerals, part of this site lies within the MSA/MCA for gypsum. As per National Policy (Paragraph 204) and Policy SP7 in the emerging Nottinghamshire Minerals Local Plan, if this site was to be taken forward within the Greater Nottingham Plan, it will need to be demonstrated that development here will not needlessly sterilise mineral resource and there is a clear need for non-mineral development in this area. Consultation should be undertaken with British Gypsum to establish if they have any existing or future interest in this area and. if British Gypsum does not have a significant interest in working this area, there may still be the potential to supply any extracted gypsum to the gypsum works close by to minimise wasting a valuable mineral resource. The potential for this should be discussed with British Gypsum.

Nottinghamshire County Council also highlights in respect of site R15.2 it covers the current Ratcliffe on Soar Power Station. As part of the process, Pulverised Fuel Ash (PFA) and Furnace Bottom Ash (FBA) are produced and whilst most PFA and FBA are sold and removed from the site, some of the ash is deposited near the power station at Winking Hill. Such disposal sites are subject to restoration and aftercare conditions as per the permissions granted and therefore the site is monitored by Nottinghamshire

County Council. If this proposed site was to be taken forward in the Greater Nottingham plan, the County Council would seek to be involved in any future proposals and consultations.

Summarised comments from developers:-

Hallam Land Management consider that a new settlement combining the Ratcliffe on Soar zero carbon technology and energy hub with the Kingston Energy Village (sites R15.2 & R15.3) presents an unrivalled opportunity for a strategic development site to become self-sustaining and carbon neutral. In addition, it has reviewed the evidence base and have identified a number of benefits to development in this location.

Mather Jamie identify state that development could potentially occur at Radcliffe on Soar Power Station (R15.2) which is redundant and where the rail station and strategic road accessibility mean the site can be sustainable if other measures are also put in place, not least an extension to the NET system to related the location better to the existing urban area.

Newton Nottingham LLP consider that R15 covers more sensitive landscape areas than the former RAF Newton due to topography, particularly to the south of the A453. This area is also subject to more significant environmental constraints. The development of land to the south of the A453 would also extend urban sprawl to the south of Clifton and encroach on the village of Gotham. The deliverability of redevelopment of the existing Ratcliffe-on-Soar Power Station site within the plan period is questionable due to the fact that it is not expected to be decommissioned until 2025 and because extensive site remediation that would be required.

The South West Nottingham Consortium and John A Wells Ltd support the conclusions of the growth options study in relation to development at R15. They also consider that R15.1 and R15.2 could provide for strategic growth during the plan period and longer term. Furthermore, they consider that the R15.1 and R15.2 has regional, national and, indeed, international connectivity provided by the M1, the Midland Mainline, the proposed HS2 and the East Midlands Airport. Furthermore, the combination of East Midlands Airport, East Midlands Gateway, East Midlands Development Corporation and the Power Station site has the potential provide up to 40,000 jobs. They consider that a focus of development, such as at the Power Station, must be accompanied by a focus on the ability of employees to access the jobs in a sustainable way.

They consider that an opportunity exists within R15.1 to create new housing, in, perhaps, two discrete communities. Each community would be large enough to contain its own local services and facilities, including a primary School. The tram could be extended to travel through the centre of each

community, providing easy access to all residents and forming a focus around which the new communities would be planned and developed.

Uniper supports the broad area of search R15 in particular R15.2. It states that the Power Station site will be available for redevelopment within the early part of the Strategic Plan period, with the potential for full redevelopment within the plan period through early identification of and support for sustainable and commercially viable opportunities. It also considers that there are exceptional circumstances to release the site from the Green Belt, although given the extent of the existing buildings some development may be considered appropriate at this point in time.

It considers that the Ratcliffe Power Station site benefits from excellent connectivity to existing infrastructure and provide the opportunity to redevelop and regenerate previously developed land and reduce the burden on the urban area and adjoining land. In addition, due to its location, excellent connectivity and available infrastructure in the area, the Power Station site has already attracted significant interest for future redevelopment. On its part, Uniper is actively working on the development of a sustainable energy hub, named East Midlands Energy Re-Generation (EMERGE) Energy Hub. It states that the ultimate objective is for the EMERGE Energy Hub to provide sustainable and reliable heat and power to modern industrial and manufacturing users located at the site after closure of the Power Station, In addition, it states that it is also worth considering that mixed use residential opportunities adjoining the Ratcliffe Power Station site offer increased scope to address climate change by minimising the travel distances of those employees living in the area, which could allow them to walk or cycle as opposed to driving to their place of work.

Summarised comments from other organisations:-

British Gypsum, have a consultative role in relation to past present and future matters in relation to gypsum workings. Their comments are focus on three areas. The potential sterilisation of permitted gypsum reserves, the development above abandoned underground room and pillar mines with risk of mining subsidence impacting on the development of the land beyond existing agricultural use and Sterilisation of nationally important future gypsum resources. In relation to R15, they state that the area is partly covered by extant permissions for underground gypsum mining. In addition, a significant proportion of the area is above abandoned underground gypsum workings, and provide a plan of where these are. They state that development above these mine workings would not be possible without extensive, very expensive drill and grout (3m high workings, 75% extraction) due to the risk of mining subsidence. Finally, it states that the southwest / western edge of the consultation area falls within an area potential gypsum resources, which should be protected from sterilisation from development.

The CPRE consider that 15.3 is unsuitable due to or more of a number of factors. In addition, it states that the Development Corporations proposed for the Toton hub and the site of Ratcliffe on Soar power station should be guided by the Strategic Plan as this plan is drawn up by public authorities accountable to the public.

The Cranmer Group of Parish Churches consider that the preferred strategic development approach would prioritise the Urban Intensification Growth Strategy, and also the Transport-Led Growth Strategy, focused on development close to the HS2 station at Toton, and also Sites R15.2 at Ratcliffe-on-Soar Power Station, and R15.1, which could be served by a further extension of the NET network

The Leake Ward Members consider that R15 together with R16 would create huge developments around the surrounding villages, and could lead to the joining of settlements. In addition, they consider that the gypsum maps should have been fed into the growth options study, as there are areas within R15 that have been mine, and development could sterilise further deposits. In addition, they consider that parts of the site lie under the flightpath of East Midlands Airport, and significant sound insulation would be required to mitigate against noise impacts. They have also raised a number of concerns in relation to R15.3. These relate to the tranquil setting of the countryside, wildlife, impact on woodland, ridges, and impacts on footpath and bridleways.

In addition, the Leake Ward members note that R15.1 and R15.2 in combination extend a finger of development out almost as far as the M1. They do suggest however that the Ratcliffe on Soar Power Station site R15.2 could include a significant amount of housing, furthermore they suggest that R15.1 could be brought out of the greenbelt and safeguarded to provide for future development to enable for the provision of sufficient housing land for the foreseeable future. This is caveated with pointing out the constraints of capacity over Clifton Bridge. And request that a tram extension and secondary school is provided if there were further development proposals in this area.

Nottinghamshire Wildlife Trust object to site R15.1, R15.2 and R15.3. It states that development at all of the sites would lead to a major intrusion into the wider countryside. In addition, they state that the sites contain or adjacent to a number of Local Wildlife sites. In addition, site 15.1 is adjacent to a SSSI and nature reserve. 15.2 would have an impact on the Ratcliffe on Soar Local Nature Reserve, and 15.5 is adjacent to the Kingston Hall Parkland. In all cases, it states that the biodiversity opportunity mapping identifies opportunities to link to and enhance woodland.

The Rushcliffe Green Party are opposed to the development of the EMERGE incinerator proposed by Uniper at the Ratcliffe on Soar power station site. They consider that we be looking to minimise waste production and creating additional facilities to burn waste will not encourage this and will lock in an unsustainable source of CO2 production for decades to come.

Summarised comments from local residents

A number of representations echo the specific concerns raised by the Gotham Ward parishes. One comment is supportive of the redevelopment of the power station but not the wider R15 zone which they consider to be attractive countryside. Other comments refer to the fact that the area was previously rejected for an eco-town proposal, and that the reasons for rejection still stand now. Concerns have been raised on the impact on green belt, wildlife, the historic environment, biodiversity, lack of services, flood risk and the loss of agricultural land. One comment states that the number of sites in this location are inappropriately combined, and that what applies to the power station is totally different to the scenic undeveloped area within the Green Belt. One comment shows concern in relation to the impact on the West Leake Conservation Area.

Conversely some comments consider that development along the A453 corridor would be of benefit as it is close to the airport and existing and planned jobs around the airport, potentially reducing travelling distances to these. There was some support for the provision of a garden town somewhere along the A453 corridor. There was some support for the development of Ratcliffe on Soar Power Station (R15.2) in particular, as it is a brownfield site. One comment supports the development of employment opportunities at Ratcliffe on Soar Power Station. Another comment cites the access to the major road network and the M1.

16. R16 East Leake Extension

Summarised comments from statutory organisations:-

Charnwood Borough Council states that R16 would look to Loughborough to provide services, however access to Loughborough from the north is restricted by the River Soar and railway lines and existing crossings and approaches to Loughborough are already congested.

East Leake Parish Council oppose the allocation of R16, raising concerns that: evidence does not reflect recent increases in housing (+50%); infrastructure is not able to support further growth, including transport infrastructure; it would contravene the Neighbourhood Plan (policies E1, E2, E4, H1, T1); adversely affect the setting of the village (extending beyond

ridgelines); harm historic assets; there is no mention of aircraft disturbance; the area is a mineral safeguarding area; and there is a risk of coalescence with West Leake and Costock.

Erewash Borough Council have formally requested that the Greater Nottingham Partnership consider whether non-Green Belt sites, such as this, could be made available to help Erewash avoid development of Green Belt land within their Borough.

Nottinghamshire County Council identifies this broad search area as within the Mineral Safeguarding Area for gypsum and also partial sand and gravel. The proposed extension to East Leake also appears to surround the permitted and active quarry of East Leake which extracts sand and gravel. The quarry is expected to be operational until 2026. If development was to occur within close proximity to the quarry, this could pose a sterilisation risk to the permitted mineral reserve and quarry. If further sites within this area are taken forward within close proximity to the quarry the County Council would seek to be involved in any future proposals or consultations. It is also recommended that the operator, Cemex, are involved with these discussions.

Summarised comments from developers:-

David Wilson Homes have provided comments that support the allocation of their land south of Rempstone Road, stating that East Leake has been understated and undervalued within Growth Study. They have raised concerns that it has not been assessed as part of the AECOM study, or as part of the Councils' own 'Growth Options Consultation' and that it should be considered as a strategic site (capacity 500 homes).

Gladman are supportive of R16 East Leake Extension which is aligned with transport networks, employment growth hubs and recognise the need to distribute growth across the settlement hierarchy. Gladman highlight that the plan should provide sufficient flexibility and deliverable sites by providing a range of sites, including smaller sized sites. Gladman has identified a discrepancy between the AECOM report and the consultation document where the broad area of growth extends east of East Leake in the study, but not in the consultation document.

Summarised comments from other organisations:-

British Gypsum state that R16 covers the permission for gypsum mining, granted on 23rd February 2017 and is directly above Marblaegis mine. Development above these mine workings would not be possible without extensive, expensive drill and grout (to prevent mining subsidence). Other parts of R16 are undermined by abandoned room and pillar gypsum mine workings, and without extensive / prohibitive remediation, these would not be

suitable for surface development. Furthermore, the southwest / western edge of the consultation area falls within an area of potential gypsum resources, which should be protected from sterilisation from development.

Nottingham Wildlife Trust objects to the inclusion of this site as it would adversely affect Meadow Park, Kingston Brook and numerous Local Wildlife Sites, including West Rushcliffe District Disused Railway. It also intrudes into countryside and is located within the East Leake and Stanford Hall Biodiversity Opportunity Mapping Focal Area. Consequently, the NWT is pleased to see this site does not feature in Appendix 2.

The Rushcliffe Borough Councillors for Leake oppose the allocation of land within R16, due to: inadequate services and facilities (resulting from cumulative developments); loss of agricultural land; sterilisation of Gypsum reserves and areas historic Gypsum mine working; loss of countryside which provides recreational space; its distance from Nottingham; the cumulative impacts and merging of strategic sites R15, R16 and R17; and conflict with the Neighbourhood Plan. Concerns regarding Stocking Lane and Lantern Lane being un-adopted, and the sewage treatment works on West Leake Road.

Summarised comments from local residents

Many local residents raised concerns regarding the scale of development (which would double the size of East Leake), the level of development that has already taken place, congestion on the local road network and inadequate services and facilities (which would need to be addressed by improvements to or the creation of new centres). They favoured development closer to the main urban area or along the A453, which are better connected to areas of employment, services and facilities. Development in this location will be more beneficial to Loughborough not Nottingham by providing housing for their employees.

Residents also stated that development of R16 would merge with and adversely affect the West Leake Conservation Area, decrease traffic safety, exacerbate flooding, and absence of infrastructure.

Others highlighted the popularity of rural living and locations such as East Leake being best placed to meet this demand.

17. R17 North of Loughborough

Summarised comments from statutory organisations:-

Charnwood Borough Council states that R17 would look to Loughborough to provide services, however access to Loughborough from the north is

restricted by the River Soar and railway lines and existing crossings and approaches to Loughborough are already congested.

East Leake Parish Council consider R017 a strange area to consider. It clearly focuses on Loughborough as its main centre, schooling etc. However, without additional crossings of the River Soar, at least for cyclists and pedestrians, accessibility seems to be poor. No consideration has been given to the potential development, by Charnwood, of the area around Cotes and the cumulative affects upon the road network.

Erewash Borough Council have formally requested that the Greater Nottingham Partnership consider whether non-Green Belt sites, such as this, could be made available to help Erewash avoid development of Green Belt land within their Borough.

Normanton Parish Council object to the allocation of R17 due to the loss of high quality agricultural land (some organically farmed); adverse impacts on scenic beauty, loss of habitats; impacts on setting/character of Normanton on Soar which is a small village; impact on listed buildings (church etc.), ferry and roman villa (Butt Lane); loss of rights of way; merging of local villages; cumulative impact with development at Cotes/Stanford on Soar; unsustainable location to meet Nottingham's needs; flooding; and land locks in carbon. Furthermore, reduced demand for offices and employment in the City due to Covid will free up brownfield sites.

Nottinghamshire County Council states that the land lies within the Mineral Safeguarding/Conservation Area for gypsum. If this site was to be taken forward, it will need to be demonstrated that development here will not needlessly sterilise mineral resource and there is a clear need for non-mineral development in this area. Consultation should be undertaken with British Gypsum. If they do not have an interest in working this area, there may still be the potential to extracted gypsum and the potential for this should be discussed with British Gypsum

Rempstone Parish Council support the majority of proposed sites but would not support R17 as this is open countryside with limited infrastructure. The surrounding roads are already over used particularly with HGVs. There may also be environmental issues and increased flood risks in the area.

Stanford on Soar strongly opposes the proposed R17 as: the agricultural land quality is good; it would adversely affect rights of way and heritage assets; create coalescence; the area is already facing large development with 1,500 homes at Cotes; increase flood risk; most residents will travel to Loughborough thus not benefiting Nottingham; and a previous application on this site was refused. The Parish Council prefer a strategy of urban regeneration. If greenfield land is required, the strategy should be transport led and favour sites close to the M1, A453 and A52.

Summarised comments from developers:-

The Paget Estate forms part of site ref R17. It has requested that the Paget Estate land be removed from site ref R17 with immediate effect. The landowner will not support promotion of her land for development, which in her opinion makes R17 undeliverable in planning terms.

Newton Nottingham LLP highlighted the benefits of R02 over sites that are isolated, such as this one.

Summarised comments from other organisations:-

The Nottinghamshire Wildlife Trust objects to the inclusion of this site. Specific concerns highlights: impacts on Loughborough Meadow Site of Special Scientific Interest and on Local Wildlife Sites, including West Rushcliffe District Disused Railway; its location within the East Leake and Stanford Hall Focal Area; and intrusion into countryside.

A Rushcliffe Borough Councillor for the Leake Ward has highlighted that whilst the site is close to Loughborough (which it will serve), it is separated by the River Soar. They also identify: the loss of high grade agricultural land with recreational value; the importance of the area for walking, cycling and horse riding; adverse impacts on the historic character of villages and landscape; loss of biodiversity; and the sterilisation of Gypsum reserves and areas of historic mine working as constraints.

St James Church oppose the allocation of R17 due to loss of farmland, flooding, inadequate power supplies, considerable development at East Leake already, loss of wildlife habitats, brownfield sites are available, loss of character, impact on local economy (local shops, recreational activities).

Summarised comments from local residents

The farmer of Cedars Farm (which comprises 1/3 of the R17) objects to the loss of Grade 2 agricultural land. It would also result in significant carbon emissions which cannot be off-set.

Residents raised concerns regarding the level of development that has already taken place in the south of Rushcliffe.

A significant number of residents identified: the absence of a willing landowner; the loss of Grade 1 and 2 agricultural land (specifically two organic farms); the loss of wildlife habitats (including woodland and hedgerows) and species (Grizzled Skipper); the adverse effects on the scenic and tranquil beauty of the area; adverse effects on the setting of St

James Church (Grade I listed); impacts on the character of Normanton on Soar and Stanford on Soar; increased flood risks for Normanton on Soar, Sutton Bonington and surrounding roads; the loss of the disabled riding school; inadequate infrastructure, services, employment and facilities; road congestion and poor safety (on the A6006); and the climate change impact of losing green space.

Due to closer proximity to existing infrastructure, services and facilities, locating development within or adjacent to the urban area and/or Ratcliffe on Soar Power Station was favoured over this site. There is concern that R17 will serve Loughborough (rather than Nottingham), but is separated by the River Soar (exacerbating congestion at the bridges).

Those that supported the allocation highlighted the popularity of rural living and locations such as East Leake being best placed to meet this demand. Others welcomed a buffer being created between the city and its outskirts and new developments (thus avoiding urban sprawl) and noted its proximity to established transport routes.

The merging of R15, R16 and R17, and need to allocate R17 as a Green and Blue Infrastructure corridor were highlighted as an important by some residents.

Other locations within Rushcliffe

Leake Road, Costock

Harris Land Management agrees that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. It suggests a hybrid strategy with a range and choice of housing and employment sites; sustainable urban extensions adjacent to the urban area and expanded existing settlements. It would be sensible to select a development strategy which included small and medium sites from the outset and Costock is well placed to be a broad location for non-strategic growth. Harris Land Management promotes the allocation for development of land at Leake Road, Costock for development. The site could be considered for non-strategic growth taking advantage of the facilities available in Costock as well as East Leake. It is located to the east of Costock and is bordered to the east and north-west by existing residential properties, and by open agricultural land to the south and north (beyond Leake Road). The site would essentially represent an infill development within Costock.

West of Cropwell Bishop

Endurance Estates consider there is the potential to consider an employment led development option on land off Nottingham Road, east of the A46 Stragglethorpe Junction, Cotgrave. This should be assessed as a suitable and sustainable growth option by the Councils in preparing the Strategic Growth Plan. Proposed uses include larger industrial units, smaller industrial units, offices for rural and farm related businesses, battery storage, E Point (EV) charging centre, Waste to Energy, and Agricultural Showrooms. The concept is set out in more detail in the attached Promotional Document and Indicative Masterplan.

Samworth Farms consider that the Strategic Plan should positively consider the delivery of land between Cropwell Bishop and the A46. It is promoted by Samworth Farms for between 450 and 650 dwellings along with 47 hectares of employment land. The site is a logical, location for development immediately adjacent to the A46. It would infill the land between Cropwell Bishop and the A46, where this is already significant development east of the A46, associated with farming and other activities. This serves to urbanise this area, including the A46 which is raised to facilitate the grade separated junction with Nottingham Road. Samworth Farms believes there is compelling justification for release of land at Cropwell Bishop from the Nottingham Derby Green Belt in order to meet the emerging housing needs and to provide employment land to meet a localised deficiency, improving the sustainability of Cropwell Bishop and the surrounding villages

North of Memorial Hall, Cropwell Bishop

Davidsons Developments agrees that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. It suggests a hybrid strategy with a range and choice of housing and employment sites; sustainable urban extensions adjacent to the urban area and expanded existing settlements. It would be sensible to select a development strategy which included small and medium sites from the outset and Cropwell Bishop is well placed to be a broad location for non-strategic growth. Davidsons Developments promotes the allocation for development of land to north of Memorial Hall and sets out a number of reasons why Cropwell Bishop and the site specifically is suitable for development.

Land east of Gypsum Way, Gotham

Davidsons Developments agrees that development cannot be met within the urban area and needs to be accommodated through a combination of land released from the Nottingham and Derby Green Belt and at locations beyond the Green Belt. It suggests a hybrid strategy with a range and choice of housing and employment sites; sustainable urban extensions adjacent to

the urban area and expanded existing settlements. It would be sensible to select a development strategy which included small and medium sites from the outset and Cropwell Bishop is well placed to be a broad location for non-strategic growth. Davidsons Developments promotes the allocation for development of land east of Gypsum Way, Gotham and sets out a number of reasons why Gotham and the site specifically is suitable for development. The site is 4 hectares in size and Davidsons Developments sets out that it has capacity for around 100 homes, and is well related to the village and located within walking distance to Gotham's services and facilities.

Sutton Bonington

Gladman proposes that strategic allocations and broad locations of growth should be supported by a range of smaller sites across the settlement hierarchy to ensure the housing needs are met in full over the entire plan period. As part of its representations Gladman promotes a site at Landcroft Lane, Sutton Bonington for development. It identifies that the 4.9 hectare site is capable of accommodating 95 dwellings and would form a logical and sustainable extension to the north-east of the village.

Kinoulton

Mather Jamie proposes that around 24 hectares of land at Owthorpe Lane, Kinoulton should be identified as for either strategic or non-strategic growth. It is considered that the land to the north of Kinoulton benefits from strategic access to the A46 and is large enough to be considered for strategic growth in its own right or it could be considered together with land to the west adjacent to the A46. Mather Jamie alternatively promotes the land for non-strategic growth, on the basis it would take advantage of the facilities available in Kinoulton, the lack of constraints and the ability of the landform to accommodate development and the lack of any potential for coalescence of settlements.

Whatton in the Vale

Knightwood Developments Limited proposes that land south of A52 at Whatton in the Vale should be identified for commercial development. The land extends to 40 hectares and it is anticipated that it would be able to deliver approximately 20 hectares of B1, B2 and B8 uses, based on 50% of the site area. The site is considered suitable for development on the basis, alongside other matters, that it is closely related to the highly sustainable villages of Whatton and Aslockton and has good public transport access. Given the site's position with access to public transport and a strategic highway network, it would result in a logical place to support economic growth and provide much needed employment opportunities for those who reside locally.

List of Respondents

Statutory Consultees

Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
27221953	Steve	Birkinshaw	Erewash Borough Council (Mr Steve Birkinshaw)	Erewash Borough Council
27193665	Richard	Brown	Charnwood Borough Council (Mr Richard Brown)	Charnwood Borough Council
27222529	Steve	Buffery	Derbyshire County Council (Mr Steve Buffery)	Derbyshire County Council
27214977	Sir/	Madam	North West Leicestershire District Council (Sir/ Madam)	North West Leicestershire District Council
27215425	Sir/	Madam	Melton Borough Council (Sir/ Madam)	Melton Borough Council
29435841	Derek	Stafford	Amber Valley Borough Council (Mr Derek Stafford)	Amber Valley Borough Council
27211617	Nina	Wilson	Nottinghamshire CC (Nina Wilson)	Nottinghamshire CC
32966049	Helen	(Clerk)	Sutton Bonington Parish Council (Helen (Clerk))	Sutton Bonington Parish Council
27186433	Julia	Barnes	Holme Pierrepont & Gamston Parish Council (Mrs Julia Barnes)	Holme Pierrepont & Gamston Parish Council
29847521	T	Barton	West Leake Parish Council (Mr T Barton)	West Leake Parish Council
29737537	Belina	Boyer	Aslockton Parish Council (Belina Boyer)	Aslockton Parish Council
27194625	Parish	Clerk	Gotham Parish Council (Parish Clerk)	Gotham Parish Council
32760417	Ian	Craik	Chetwynd: The Toton and Chilwell Neighbourhood Forum (Mr Ian Craik)	Chetwynd: The Toton and Chilwell Neighbourhood Forum
29187809	Margaret	Curran	Bradmore Parish Council (Mrs Margaret Curran)	Bradmore Parish Council
27212065	Claire	Dorans	Ruddington Parish Council (Miss Claire Dorans)	Ruddington Parish Council
30096929	Mike	Elliott	Willoughby on the Wolds Parish Council (Mike Elliott)	Willoughby on the Wolds Parish Council
30097121	Mike	Elliott	Whatton-in-the-Vale Parish Council (Mike Elliott)	Whatton-in-the-Vale Parish Council
30097313	Mike	Elliott	Stanton on the Wolds Parish Council (Mike Elliott)	Stanton on the Wolds Parish Council
30097377	Mike	Elliott	Flintham Parish Council (Mike Elliott)	Flintham Parish Council

Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
29373793	Jane	Evans	Jane Evans	
27212673	Clare	Fox	East Bridgford Parish Council (Clare Fox)	East Bridgford Parish Council
29884577	John	Gossage	Alverton & Kilvington Parish Meeting (Mr John Gossage)	Alverton & Kilvington Parish Meeting
27205249	Liz	Gretton	Papplewick Parish Council (Ms Liz Gretton)	Papplewick Parish Council
27205217	Liz	Gretton	Linby Parish Council (Ms Liz Gretton)	Linby Parish Council
27186465	Jacki	Grice	Radcliffe on Trent Parish Council (Ms Jacki Grice)	Radcliffe on Trent Parish Council
27216769	Rebecca	Hague	Stanford on Soar Parish Council (Mrs Rebecca Hague)	Stanford on Soar Parish Council
29008161	Rebecca	Hague	Rempstone Parish Council (Mrs Rebecca Hague)	Rempstone Parish Council
29296417	Nicki	Hammond	Orston Parish Council (Cllr Nicki Hammond)	Orston Parish Council
29284449	Alan	Harvey	Saxondale Parish Meeting (Mr Alan Harvey)	Saxondale Parish Meeting
32618945	Mark	Johnson	Kingston on Soar Parish Council (Mr Mark Johnson)	Kingston on Soar Parish Council
27182689	Belinda	Kalka	Ravenshead Parish Council (Ms Belinda Kalka)	Ravenshead Parish Council
29426753	Allan	Kerr	Barton in Fabis Parish Council (Mr Allan Kerr)	Barton in Fabis Parish Council
32208577	Francesco	Lari	St Albans Parish Council (Cllr Francesco Lari)	St Albans Parish Council
29884289	Susan	Lewis	Normanton on Soar Parish Council (Mrs Susan Lewis)	Normanton on Soar Parish Council
32655425	David	Lovett	Chetwynd: The Toton and Chilwell Neighbourhood Forum (Mr David Lovett)	Chetwynd: The Toton and Chilwell Neighbourhood Forum
27186401	Sir/	Madam	Greasley Parish Council (Sir/ Madam)	Greasley Parish Council
27213377	Sir/	Madam	Caythorpe Parish Council (Sir/ Madam)	Caythorpe Parish Council
27221441	Sir/	Madam	Stapleford Town Council (Sir/ Madam)	Stapleford Town Council
29932321	Sir/	Madam	Tollerton Parish Council (Sir/ Madam)	Tollerton Parish Council
31675393	Sir/	Madam	East Leake Parish Council (Sir/ Madam)	East Leake Parish Council
27186593	Averil	Marczak	Woodborough Parish Council (Ms Averil Marczak)	Woodborough Parish Council
27186561	Lynda	Ogilvie	St Albans PC (Mrs Lynda Ogilvie)	St Albans PC
29346049	Jason	King	St Albans Parish Council (Cllr Jason King)	St Albans Parish Council
27186625	Anne	Pallett	Calverton Parish Council (Mrs Anne Pallett)	Calverton Parish Council

Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
29269601	Timothy	Powell	Elton-on-the-Hill Parish Meeting (Mr Timothy Powell)	Elton-on-the-Hill Parish Meeting
29413985	John	Rainbow	Granby cum Sutton Parish Council (Mr John Rainbow)	Granby cum Sutton Parish Council
32964673	Vicky	Roe	Kegworth Parish Council (Vicky Roe)	Kegworth Parish Council
29400801	Jessica	Sherrin	Burton Joyce Parish Council (Mrs Jessica Sherrin)	Burton Joyce Parish Council
29827105	Raymond	State	Ratcliffe on Soar Parish Meeting (Mr Raymond State)	Ratcliffe on Soar Parish Meeting
29426625	John	Stockwood	Bingham Parish Council (Mr John Stockwood)	Bingham Parish Council
32067169	Martyn	Thorpe	St Albans Parish Council (Cllr Martyn Thorpe)	St Albans Parish Council
29359137	Tony	Wells	Keyworth Parish Council (Cllr Tony Wells)	Keyworth Parish Council
27209889	Ben	Wilson	Thrumpton Parish Meeting (Mr Ben Wilson)	Thrumpton Parish Meeting
27221921	Steve	Beard	Sport England (Mr Steve Beard)	Sport England
27194945	Chris	Bramley	Severn Trent - Sewerage Management Planning (Mr Chris Bramley)	Severn Trent - Sewerage Management Planning
27215169	Tom	Clarke MRTPI	Theatres Trust (Mr Tom Clarke MRTPI)	Theatres Trust
29769377	Brendon	Dale	Homes England (Mr Brendon Dale)	Homes England
27196865	Ian	Dickinson	Canal & River Trust (Mr Ian Dickinson)	Canal & River Trust
27220641	Simon	Fisher	National Farmers Union (Mr Simon Fisher)	National Farmers Union
27221985	Steve	Freek	Highways England (Mr Steve Freek)	Highways England
27225185	Reiss	Graham	High Speed Two (HS2) Limited (Mr Reiss Graham)	High Speed Two (HS2) Limited
27190465	Paul	Hinton	Defence Infrastructure Organisation (MOD) (Mr Paul Hinton)	Defence Infrastructure Organisation (MOD)
27187233	Sir/	Madam	Natural England (Sir/ Madam)	Natural England
27192001	Sir/	Madam	Historic England (Sir/ Madam)	Historic England
27211809	Sir/	Madam	NHS Nottingham West Clinical Commissioning Group (Sir/ Madam)	NHS Nottingham West Clinical Commissioning Group
27215265	Sir/	Madam	The Coal Authority (Sir/ Madam)	The Coal Authority
27218113	Rob	Millbank	Environment Agency (Mr Rob Millbank)	Environment Agency

Other Consultees

Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
29552193	Abby	Brennan	Rushcliffe Borough Council (Cllr Abby Brennan)	Rushcliffe Borough Council
29392225	Beverley	Burton	equipped2succeed and Second Chance Learning Academy (Ms Beverley Burton)	equipped2succeed and Second Chance Learning Academy
31943425	John	Cottee	Rushcliffe Borough Council - Keyworth and Wolds Ward (Cllr John Cottee)	Rushcliffe Borough Council - Keyworth and Wolds Ward
31740641	Ruth	Edwards	Member of Parliament - Rushcliffe (Mrs Ruth Edwards)	Member of Parliament - Rushcliffe
31943457	Andrew	Edyvean	Rushcliffe Borough Council - Keyworth and Wolds Ward (Cllr Andrew Edyvean)	Rushcliffe Borough Council - Keyworth and Wolds Ward
27180609	Andrew	Ellwood	Cllr Andrew Ellwood	
29442465	Mike	Gaunt	Rushcliffe Borough Council (Councillor Mike Gaunt)	Rushcliffe Borough Council
32722305	Penny	Gowland	Rushcliffe Borough Councillor (Cllr Penny Gowland)	Rushcliffe Borough Councillor
27222817	Sue	Green	Home Builders Federation (HBF) (Ms Sue Green)	Home Builders Federation (HBF)
32390273	Joan	Inger	Calverton Parish Council (Mrs Joan Inger)	Calverton Parish Council
31943361	Rob	Inglis	Rushcliffe Borough Council - Keyworth and Wolds Ward (Cllr Rob Inglis)	Rushcliffe Borough Council - Keyworth and Wolds Ward
32438785	Sue	Jones	Nottinghamshire Ramblers (Dr Sue Jones)	Nottinghamshire Ramblers
29429825	Leo	Lanzoni	Councillor Leo Lanzoni	
29447745	Richard	Mallender	Rushcliffe Green Party (Councillor Richard Mallender)	Rushcliffe Green Party
29456833	Gerald	McMahon	Cllr Gerald McMahon	
28984609	Mario	Molinari	Mr Mario Molinari	
30139329	Michael	Payne	Councillor (Cllr Michael Payne)	Councillor
32484353	Michelle	Storer	Grantham Canal Society (Michelle Storer)	Grantham Canal Society
29410273	Carys	Thomas	RBC Leake Ward members (Cllr Carys Thomas)	RBC Leake Ward members
28980737	Roger	Upton	Rushcliffe Borough Council (Cllr Roger Upton)	Rushcliffe Borough Council
29562305	Jennifer	Walker	Rushcliffe Borough Council (Cllr Jennifer Walker)	Rushcliffe Borough Council
30096385	Rex	Walker	Cllr Rex Walker	

Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
29430401	Jonathan	Wheeler	Nottinghamshire County Council (Cllr Jonathan Wheeler)	Nottinghamshire County Council
30039713	Debra	Willoughby	Bumpkin Dairy co (Mrs Debra Willoughby)	Bumpkin Dairy co
29443553	Linda	Abbey	Keyworth Conservation Area Advisory Group (Mrs Linda Abbey)	Keyworth Conservation Area Advisory Group
30044193	Sue	Archbold	St James' Church NOS (Dr Sue Archbold)	St James' Church NOS
30081153	Elizabeth	Ashcroft	36th Nottingham (Special Needs) Guides and Rangers (Elizabeth Ashcroft)	36th Nottingham (Special Needs) Guides and Rangers
27224929	Sue	Ball	Tollerton Against Backdoor Urbanisation (TABU) (Dr Sue Ball)	Tollerton Against Backdoor Urbanisation (TABU)
28931201	Wendy	Bannerman	British Horse Society (Wendy Bannerman)	British Horse Society
29445761	Philip	Barker	Edwalton Municipal Golf and Social Club (Mr Philip Barker)	Edwalton Municipal Golf and Social Club
29443169	Matthew	Barney	www.GeoGreenPower.com (Mr Matthew Barney)	www.GeoGreenPower.com
29447777	Tim	Chambers	The Cranmer Group of Parishes (Rev Tim Chambers)	The Cranmer Group of Parishes
30082913	Sarah	Clarkson	Girlguiding Nottinghamshire (Sarah Clarkson)	Girlguiding Nottinghamshire
29413953	Julia	Devonport	Burton Joyce Climate Action group (Julia Devonport)	Burton Joyce Climate Action group
27182561	Ben	Driver	Nottinghamshire Wildlife Trust (Mr Ben Driver)	Nottinghamshire Wildlife Trust
29437377	Aj	Ellahi	OSVAID (Orston & Surrounding Villages Against Inappropriate Development) (Mr ...)	OSVAID (Orston & Surrounding Villages Against Inappropriate Development)
27217057	Richard	Fife	Burton Joyce Village Society (Mr Richard Fife)	Burton Joyce Village Society
27193025	Jane	Fraser	Mrs Jane Fraser	
29379681	Michele	Hampson	Diocese of Southwell and Nottingham (Michele Hampson)	Diocese of Southwell and Nottingham
30487969	Kayleigh & Kirstie	Hunt & Pogson	Girlguiding Nottinghamshire (Kayleigh & Kirstie Hunt & Pogson)	Girlguiding Nottinghamshire
29447169	Guy	Jones	Nottingham Green Party (Mr Guy Jones)	Nottingham Green Party
32128449	Nathan	Kenney	Mapperley all-stars coaching (Mr Nathan Kenney)	Mapperley all-stars coaching
28502721	Margaret	Knowles	Nottingham Local Access Forum (Margaret Knowles)	Nottingham Local Access Forum

Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
27182785	Bettina	Lange	Nottinghamshire Campaign to Protect Rural England (Ms Bettina Lange)	Nottinghamshire Campaign to Protect Rural England
27196577	Hugh	McClintock	Pedals (Nottingham Cycling Campaign) (Hugh McClintock)	Pedals (Nottingham Cycling Campaign)
27226113	Philip	Oddie	Willow Farm Action Group (Mr Philip Oddie)	Willow Farm Action Group
27182657	Caroline	Penn	Beeston and District Civic Society (Mrs Caroline Penn)	Beeston and District Civic Society
27201025	John	Pilgrim	Dept. for Education (Mr John Pilgrim)	Dept. for Education
27186721	Clive	Rix	Nottingham Credit Union (Clive Rix)	Nottingham Credit Union
27211169	Nick	Sandford	The Woodland Trust (Mr Nick Sandford)	The Woodland Trust
30030497	Peter	Stansbury	Regatta Way Sports Club (Mr Peter Stansbury)	Regatta Way Sports Club
27186017	Christine	Turner	Sharphill Action Group (SAG) (Ms Christine Turner)	Sharphill Action Group (SAG)
29565185	Richard	Watchorn	Thoroton & District Branch - Newark Conservative Association (Mr Richard Watc...	Thoroton & District Branch - Newark Conservative Association
30044481	Iain	Whitmore-Kirby	Meadow School of Riding (Mr Iain Whitmore-Kirby)	Meadow School of Riding
27207745	Martin	Willis	Nottingham Open Spaces Forum (Mr Martin Willis)	Nottingham Open Spaces Forum
29696193	Penny	Gowland	Cllr Penny Gowland	Rushcliffe Borough Council
27178721	Adey	Hobson	RAF Syerston (Wg Cdr Adey Hobson)	RAF Syerston
27217921	Rod	Jones	Rod Jones	Rushcliffe Borough Council
29825953	Shirley	Lockwood	Cllr Shirley Lockwood	Orston Parish Council

Landowners/ Developers/ Agents

Agent ID	Agent First Name	Agent Last Name	Agent Organisation	Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
27180801	Andrew	Hiorns	Andrew Hiorns Town Planning Limited	31652577	Andrew	Bamber	Parker Strategic Land Limited (site at Cotgrave) (Mr Andrew Bamber)	Parker Strategic Land Limited (site at Cotgrave)
27180801	Andrew	Hiorns	Andrew Hiorns Town Planning Limited	31916897	Andrew	Bamber	Parker Strategic Land Limited (land south of Nottingham Road, Broxtowe) (Mr A...	Parker Strategic Land Limited (land south of Nottingham Road, Broxtowe)
27180801	Andrew	Hiorns	Andrew Hiorns Town Planning Limited	32033089	Andrew	Bamber	Parker Strategic Land Limited (Catstone Green site) (Mr Andrew Bamber)	Parker Strategic Land Limited (Catstone Green site)
0				31229377	Hannah	Barter	D2H Land Planning Development Ltd (Ms Hannah Barter)	D2H Land Planning Development Ltd
27210913	Niamh	Burke	Carter Jonas	29282881	Andrew	Bennett	Burhill Group Limited (Mr Andrew Bennett)	Burhill Group Limited
27204001	Kieron	GREGSON	Carter Jonas	29282881	Andrew	Bennett	Burhill Group Limited (Mr Andrew Bennett)	Burhill Group Limited
27209953	Michael	Davies	Savills	32962817	Rushcliffe	Borough Council	Rushcliffe Borough Council	
0				27193825	George	Breed	Persimmon Homes (Mr George Breed)	Persimmon Homes
32960129	Jeremy	Williams	ID Planning	32960065	John	Breedon	Mr John Breedon	
27193377	Gary	Lees	Pegasus Group	29738273	Paul	Burton	Hallam Land Management (Mr Paul Burton)	Hallam Land Management

Agent ID	Agent First Name	Agent Last Name	Agent Organisation	Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
27185569	Chris	Waumsley	Freeths	29738273	Paul	Burton	Hallam Land Management (Mr Paul Burton)	Hallam Land Management
27211137	Nick	Grace	GraceMachin Planning & Property	32671553	Conlon	Construction (Nottm) Ltd	Conlon Construction (Nottm) Ltd	
29550177	Robert	Bloomfield	Shouler & Son	29549985	Edward	Cursham	Knights PLC (Mr Edward Cursham)	Knights PLC
29869569	Corin	Williams	Savills	32071713	Michael	Davies	Wilson Bowden Developments (Mr Michael Davies)	Wilson Bowden Developments
0				28336033	Tom	Dillarstone	William Davis (Mr Tom Dillarstone)	William Davis
0				31980129	Michael	Dinn	Gladman (Mr Michael Dinn)	Gladman
0				29443009	Mike	Downes	Aspbury Planning (Mr Mike Downes)	Aspbury Planning
27224961	Tom	Beavin	JVH Town Planning Consultants Ltd	32393569	Executors of	Evelyn Shepperson	Executors of Evelyn Shepperson	
27178785	Sir/	Madam	Oxalis Planning	28258945	Kate	Fell	Bloor Homes Midlands (Ms Kate Fell)	Bloor Homes Midlands
29685441	Sir/	Madam	DLP Planning Ltd	29685537	Dale	Fixter	City Estates (Mr Dale Fixter)	City Estates
27194657	Geoffrey	Prince	Geoffrey Prince Associates Ltd	27189217	David	Fletcher	Langridge Homes Ltd (Mr David Fletcher)	Langridge Homes Ltd
27224609	Tim	Coleby	Stantec (formerly Peter Brett Associates)	29687297	Ned	Fox	Barwood Homes (Mr Ned Fox)	Barwood Homes

Agent ID	Agent First Name	Agent Last Name	Agent Organisation	Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
0				27218337	Robert	Galij	Barratt David Wilson Homes (Mr Robert Galij)	Barratt David Wilson Homes
0				29684865	Stuart	Garnett	Inspired Villages (Mr Stuart Garnett)	Inspired Villages
0				27211137	Nick	Grace	GraceMachin Planning & Property (Mr Nick Grace)	GraceMachin Planning & Property
29363745	David	Barnes	Star Planning	28528833	Jonathan	Greenberg	Woolbro Morris (Mr Jonathan Greenberg)	Woolbro Morris
0				32965857	Sheila	Hall	Mrs Sheila Hall	
27188993	David	Wood	Marrons Planning	31711169	Mr & Mrs	Hammond	Whitefields Farm (Mr & Mrs Hammond)	Whitefields Farm
27194657	Geoffrey	Prince	Geoffrey Prince Associates Ltd	27200001	Robert	Hammond	Hammond Farms (Mr Robert Hammond)	Hammond Farms
27180129	Amy	Biddell	Mather Jamie	30121537	Joanna	Herbert-Stepney	Paget Estate (Miss Joanna Herbert-Stepney)	Paget Estate
28503137	David	Hutchinson	Boyer	31493889	David	Herrick	Mr David Herrick	
27181057	Angela	Smedley	Fisher German LLP	32950817	Malcolm	Hodgkinson	Mr Malcolm Hodgkinson	
29620865	Sarah	Clark	Planning & Design Group (UK) Limited	29620769	Annabel	Holmes	The University of Nottingham (Ms Annabel Holmes)	The University of Nottingham
0				32952897	Tim	Holmes	Endurance Estates (Mr Tim Holmes)	Endurance Estates
27224993	Tom	Collins	nineteen47	29994977	Steve	Louth	Richborough Estates (Burnside Grove, Tollerton) (Mr Steve Louth)	Richborough Estates (Burnside Grove, Tollerton)

Agent ID	Agent First Name	Agent Last Name	Agent Organisation	Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
27224993	Tom	Collins	nineteen47	31990401	Steve	Louth	Richborough Estates (Land off Oxtan Road, Calverton) (Mr Steve Louth)	Richborough Estates (Land off Oxtan Road, Calverton)
29783777	David	Bainbridge	Savills	31993633	Sir/	Madam	Taylor Wimpey (Land West of Ruddington) (Sir/ Madam)	Taylor Wimpey (Land West of Ruddington)
29783777	David	Bainbridge	Savills	31993921	Sir/	Madam	Taylor Wimpey (Land North West of East Bridgford) (Sir/ Madam)	Taylor Wimpey (Land North West of East Bridgford)
29783777	David	Bainbridge	Savills	31997313	Sir/	Madam	Taylor Wimpey (Land East of Gamston) (Sir/ Madam)	Taylor Wimpey (Land East of Gamston)
31543393	James	Beverley	Fisher German LLP	31543553	Sir/	Madam	Samworth Farms Limited (Sir/ Madam)	Samworth Farms Limited
31543393	James	Beverley	Fisher German LLP	31921185	Sir/	Madam	Landowner east of Mansfield Road, Eastwood (Sir/ Madam)	Landowner east of Mansfield Road, Eastwood
31543393	James	Beverley	Fisher German LLP	31921793	Sir/	Madam	Landowner north of Nuthall (Sir/ Madam)	Landowner north of Nuthall
29749345	Michael	Burrow	Savills	29749313	Sir/	Madam	Gaintame Ltd (Sir/ Madam)	Gaintame Ltd
27209953	Michael	Davies	Savills	32000449	Sir/	Madam	Wilson Bowden Developments (Land at New Farm, Nuthall) (Sir/ Madam)	Wilson Bowden Developments (Land at New Farm, Nuthall)

Agent ID	Agent First Name	Agent Last Name	Agent Organisation	Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
27209953	Michael	Davies	Savills	32000545	Sir/	Madam	Wilson Bowden Developments (Land West of Woodhouse Way) (Sir/ Madam)	Wilson Bowden Developments (Land West of Woodhouse Way)
27196833	Ian	Deverall	Turley	31603457	Sir/	Madam	IM Land (Sir/ Madam)	IM Land
31820801	Miles	Drew	Avison Young	31820929	Sir/	Madam	Homes England and the Defence Infrastructure Organisation (Sir/ Madam)	Homes England and the Defence Infrastructure Organisation
27180385	Andrew	Gore	Marrons Planning	29765697	Sir/	Madam	Mather Jamie Ltd (Sir/ Madam)	Mather Jamie Ltd
27180385	Andrew	Gore	Marrons Planning	31756705	Sir/	Madam	Braemore Group and Mr Knibb (Sir/ Madam)	Braemore Group and Mr Knibb
27211137	Nick	Grace	GraceMachin Planning & Property	29820737	Sir/	Madam	DSL Holdings Ltd (Sir/ Madam)	DSL Holdings Ltd
27223393	Suzi	Green	Bidwells	29768033	Sir/	Madam	Trinity College (Sir/ Madam)	Trinity College
29559169	Katie	Hancock	Pegasus Group	31819681	Sir/	Madam	Loughborough Road Consortium (Sir/ Madam)	Loughborough Road Consortium
28503137	David	Hutchinson	Boyer	31583073	Sir/	Madam	Michael Machin, Gaintame Limited, Wheatcroft Farm Limited, John A Wells Limit...	Michael Machin, Gaintame Limited, Wheatcroft Farm Limited, John A Wells Limited
28503137	David	Hutchinson	Boyer	31873761	Sir/	Madam	Stagfield Group (Sir/ Madam)	Stagfield Group
28503137	David	Hutchinson	Boyer	31879169	Sir/	Madam	Harworth Group (Sir/ Madam)	Harworth Group

Agent ID	Agent First Name	Agent Last Name	Agent Organisation	Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
28503137	David	Hutchinson	Boyer	31915105	Sir/	Madam	Strawsons Group Investments Ltd (Sir/ Madam)	Strawsons Group Investments Ltd
27178785	Sir/	Madam	Oxalis Planning	29747809	Sir/	Madam	John A Wells Ltd (Sir/ Madam)	John A Wells Ltd
27178785	Sir/	Madam	Oxalis Planning	29748289	Sir/	Madam	South West Nottingham Consortium (Sir/ Madam)	South West Nottingham Consortium
27178785	Sir/	Madam	Oxalis Planning	30852769	Sir/	Madam	Oxalis Planning on behalf of unnamed landowners and developers (Sir/ Madam)	Oxalis Planning on behalf of unnamed landowners and developers
27178785	Sir/	Madam	Oxalis Planning	31849281	Sir/	Madam	Oxalis Planning and Boyer Planning on behalf of W Westerman Limited and Straw...	Oxalis Planning and Boyer Planning on behalf of W Westerman Limited and Strawsons Property
29994817	Rob	Moore	Savills (UK) Ltd	29994881	Sir/	Madam	Landowner Consortium (south of Orston) (Sir/ Madam)	Landowner Consortium (south of Orston)
31740865	Catherine	Mumby	Avison Young	32093729	Sir/	Madam	Jelson Homes and the Wheatcroft Family (Sir/ Madam)	Jelson Homes and the Wheatcroft Family
31711553	Adam	Murray	Andrew Granger and Co	31711265	Sir/	Madam	The Hill Family (Sir/ Madam)	The Hill Family
30248385	Sean	Nicholson	Wood PLC	31650465	Sir/	Madam	Crown Estate (Sir/ Madam)	Crown Estate
29765729	Amy	Petrikova	Nexus Planning	29765697	Sir/	Madam	Mather Jamie Ltd (Sir/ Madam)	Mather Jamie Ltd

Agent ID	Agent First Name	Agent Last Name	Agent Organisation	Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
29765729	Amy	Petrikova	Nexus Planning	29767009	Sir/	Madam	CEG Land Promotions I (UK) Ltd (Sir/ Madam)	CEG Land Promotions I (UK) Ltd
27181057	Angela	Smedley	Fisher German LLP	31923105	Sir/	Madam	Taylor Wimpey (Land at Chilwell Lane, Bramcote) (Sir/ Madam)	Taylor Wimpey (Land at Chilwell Lane, Bramcote)
27181057	Angela	Smedley	Fisher German LLP	32073441	Sir/	Madam	The Trustees of the Locko 1991 Settlement (Sir/ Madam)	The Trustees of the Locko 1991 Settlement
27180161	Amy	Smith	Pegasus Group	31820897	Sir/	Madam	Nottinghamshire County Council and Hallam Land Management (Sir/ Madam)	Nottinghamshire County Council and Hallam Land Management
31870113	Kathryn	Ventham	Barton Willmore	31870273	Sir/	Madam	JG Woodhouse & Sons (Sir/ Madam)	JG Woodhouse & Sons
31870113	Kathryn	Ventham	Barton Willmore	31923745	Sir/	Madam	FH Farms Ltd (Sir/ Madam)	FH Farms Ltd
27188993	David	Wood	Marrons Planning	31704993	Sir/	Madam	Crofts Development Ltd (Sir/ Madam)	Crofts Development Ltd
27188993	David	Wood	Marrons Planning	31709665	Sir/	Madam	Davidsons Developments Ltd (Aslockton) (Sir/ Madam)	Davidsons Developments Ltd (Aslockton)
27188993	David	Wood	Marrons Planning	31710817	Sir/	Madam	Davidsons Developments Ltd (Gotham) (Sir/ Madam)	Davidsons Developments Ltd (Gotham)
27188993	David	Wood	Marrons Planning	31710913	Sir/	Madam	Davidsons Developments Ltd (Land South of Gamston) (Sir/ Madam)	Davidsons Developments Ltd (Land South of Gamston)

Agent ID	Agent First Name	Agent Last Name	Agent Organisation	Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
27188993	David	Wood	Marrons Planning	31711105	Sir/	Madam	Harris Land Management (Sir/ Madam)	Harris Land Management
27188993	David	Wood	Marrons Planning	31733601	Sir/	Madam	Davidsons Developments Ltd (Cropwell Bishop interest) (Sir/ Madam)	Davidsons Developments Ltd (Cropwell Bishop interest)
29445185	John	Wyatt	JW Planning Ltd	29743457	Sir/	Madam	Hall Construction Services Ltd (Sir/ Madam)	Hall Construction Services Ltd
27224609	Tim	Coleby	Stantec (formerly Peter Brett Associates)	27202593	Julie	Morgan	Barwood Land (Ms Julie Morgan)	Barwood Land
32930337	Guy	Wakefield	Ridge and Partners LLP	27202593	Julie	Morgan	Barwood Land (Ms Julie Morgan)	Barwood Land
28503137	David	Hutchinson	Boyer	31933377	Mr Stubbs and	Mr Whittington	Mr Stubbs and Mr Whittington	
27183265	Bob	Woollard	Planning and Design Group (UK) Limited	30045249	The Trustees for the Estate of	Mrs Joan Winifred Briggs	The Trustees for the Estate of Mrs Joan Winifred Briggs	
27217537	Richard	Ling	Richard Ling & Associates	32829441	and Mrs	Myles	Mr and Mrs Myles	
27205793	Lynette	Swinburne	Savills UK Ltd	30121281	C	Nott	Mr C Nott	
0				29471393	Matt	Oliver	Penland Estates (Mr Matt Oliver)	Penland Estates
0				32717889	Christian	Orr	Hollins Strategic Land (Mr Christian Orr)	Hollins Strategic Land
29994817	Rob	Moore	Savills (UK) Ltd	30853537	Mr and Mrs	Peacock	Mr and Mrs Peacock	
0				29685313	David	Prowse	David Wilson Home East Midlands (Mr David Prowse)	David Wilson Home East Midlands

Agent ID	Agent First Name	Agent Last Name	Agent Organisation	Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
30286849	Simon	Heaton	Simon Heaton, Planning Consultant	32484449	S	Raynor	Mr S Raynor	
0				27180865	Andy	Read	Uniper UK Limited (Dr Andy Read)	Uniper UK Limited
0				29821921	Jennifer	Saunders	British Gypsum (Jennifer Saunders)	British Gypsum
27213121	Paul	Stone	Stone Planning Services	27225889	Wayne	Scholter	Aldergate Properties Ltd (Mr Wayne Scholter)	Aldergate Properties Ltd
31730881	Laura	McCombe	Boyer	32837729	Haydn	Short	Knightwood Developments Limited (Haydn Short)	Knightwood Developments Limited
0				27213121	Paul	Stone	Stone Planning Services (Mr Paul Stone)	Stone Planning Services
27181057	Angela	Smedley	Fisher German LLP	32950049	Joanna	Sztejer	Joanna Sztejer	
27178785	Sir/	Madam	Oxalis Planning	29749921	Richard	Taylor	Richard Taylor	
0				27214049	Peter	Tyers	Peter Tyers Associates (Mr Peter Tyers)	Peter Tyers Associates
0				27207777	Martin	Valentine	Positive Homes Ltd (Mr Martin Valentine)	Positive Homes Ltd
27193857	George	Machin	GraceMachin Planning & Property	29408225	S and C	Voce	Mr S and C Voce	
0				27222593	Stephen	Walker	Mr Stephen Walker	
32962465	Chris	Quinsee	Q&A Planning Ltd	27220737	Simon	Waterfield	Newton Nottingham LLP (Mr Simon Waterfield)	Newton Nottingham LLP

Agent ID	Agent First Name	Agent Last Name	Agent Organisation	Respondent ID	Respondent First Name	Respondent Last Name	Respondent Name	Respondent Organisation
27178785	Sir/	Madam	Oxalis Planning	27193633	Robert	Westerman	W Westerman Ltd (Mr Robert Westerman)	W Westerman Ltd
27207489	Mark	Rose	Define	27208385	Max	Whitehead	Bloor Homes (Mr Max Whitehead)	Bloor Homes
32966241	Matthew	Nicholson	WSP	32966145	Alison	Woodall	Global Mutual (on behalf of The Victoria Centre Partnership) (Ms Alison Woodall)	Global Mutual (on behalf of The Victoria Centre Partnership)

Local Residents

Respondent ID	Respondent Title	Respondent Name
29447009	Ms	Ms Eleanor Abad-Castro
27209057	Mr	Mr Michael Abrahamson
29445313	Dr	Dr Mohammed Afsar
29470945	Mr	Mr Tony Aitchison
33062337	Mr	Mr James Akroyd
33062913		Supriya Akroyd
33063329		Jane and Robbie Alford
29430305		Dominic Al-Hariri
29446049		Jeanette Al-Hariri
27220097	Mr	Mr David Allan
27189185	Mr	Private (Mr David Allcock)
29200225	Miss	Miss Begonia Almena
29428705		Alison Anderson
29112353	Miss	Miss Liz Annable
30543905		Patricia Annesley

Respondent ID	Respondent Title	Respondent Name
29429057	Mr	Mr Gerald Appleton
32694017		Katherine Appleton
33063425	Mr	Mr Richard Arblaster
30044321	Mr	Mr Brian Archbold
27202721	Mr	Mr Kevin Arkell
29411041	Mr	Mr Lawrance Armstrong
27205601	Mrs	Mrs Charlotte Ashby
27216545	Mr	Mr Richard Ashby
33064897		Belinda Asquith
29883841	Mr	Mr Derek Astill
29612737	Mr	Mr Ross Aston
32637921	Ms.	Ms. Sandra Atkin
29426785	Miss	Miss Kath Auckland
27221633	Mr	Mr Stephen Austin
30507585	Mr	Mr Ian Baggaley
33064929	Mr	Mr Rob Bailey
33064993		Sally Bailey
30540961		Amanda Bajcar
29428673	Mr	Mr Michael Bajcar
29429473	Mr	Mr Paul Baker
32718593	Mrs	Mrs Alison Bakewell
32592161		Gillian Barker
29413889	Mr	Mr Philip Barker
30418529	Mr	Mr Colin Barratt
29333345	Miss	Miss Sarah Barrett
27180673	Mr	Mr Andy Barritt
27224257		Neil Barrs
29613377	Mr	Mr David Barsby
29413537	Mr	Mr Alex Barton

Respondent ID	Respondent Title	Respondent Name
30446305	Mr	Mr Harry Batchford
29741537	Mr	Mr Gary Bates
30088193	Mr &	Mr & Mrs Bates
29711809	Mrs	Mrs Natsha Bates
29429953		Craig Baum
29566113	Ms	Ms Frances Baum
32596929	Ms	Ms Brenda Baxter
33118977	Ms	Ms Jane Baxter
33173953	Mrs	Mrs May Beale
30057953		Joanna Beard
29391649	Mr	Mr Neil Beaumont
33174241	Mr	Mr Mark Beaven
30586241	Mr	Mr Jarrod Bell
30081089		Nicola Bell
30483905	Ms	Ms Nicola Bell
30085505		Peter Bell
32670209	Mr	Mr Peter Benbow
29271009	Ms	Ms Sue Beresford
32743137	Dr.	Dr. Darren Beriro
32718625	Miss	Miss Aurelie Bernard
30446369	Mr	Mr J Bernholz
28722881		Paul Berrisford
33174433	Mr	Mr Antonio Biondi
33178721		Donna Biondi
29106305	Mr	Mr Richard Bird
32721921	Dr	Dr Simon Bishop
28564577	Mrs	Mrs Jennifer Boniface
29445889	Mr	Mr Terence Boniface
29413217	Mrs	Mrs Jenny Bordley

Respondent ID	Respondent Title	Respondent Name
29413793	Mr	Mr Robert Bordley
29447681	Mrs	Mrs Maureen Bosworth
29447457		Kath Bowden
28725665	Mr	Mr Richard Bowden
33178849	Mr	Mr Roderick Bowie
29089121		Phillipa Bradley
29362433	Mr	Mr Kevin Bramley
33179073	Mrs	Mrs Lucy Branson
29428961	Mr	Mr Chris Bravington
30565281	Ms	Ms Barbara Breakwell
29565025	Mr	Mr Martin Breakwell
29446209		Heidi Breed
30082113		John Breedon
30081665		Matthew Breedon
30081921		Ross Breedon
30081441		Sue Breedon
29426529	Mrs	Mrs Jill Bright
27178433		A Bromell
30543969		Catherine Brown
32669761	Mrs	Mrs Lorraine Brown
33179265		Pat Brown
30603937	Miss	Miss Polly Browne
32669153	Mr	Mr Christopher Bruce
29270497	Mr	Mr Kev Bryant
30039105	Mrs	Mrs Alison Buckley
30039233	Mrs	Mrs Grace Buckley
32718753	Mrs	Mrs Margaret Bull
29567521	Ms	Ms Lisa Burdett
33179841	Mr	Mr Richard Burke

Respondent ID	Respondent Title	Respondent Name
30159265	Mrs	Mrs Linda Burrough
30507393	Mr	Mr Philip Burton
32637473	Mr	Mr Shane Burton
29428833	Mr	Mr Carl Butler
28564609	Ms	Ms Mary Butler
32724321	Mr	Mr Richard Butterwick
32728161	Mr	Mr Andy Cameron
33180961	Mr	Mr Kevin Campbell
33214657		Victoria Campbell
30585345		Ruth Cannavan
29472033	Mr	Mr Fraser Carlisle
29580257	Mrs	Mrs Karen Carlisle
29686273	Mr	Mr Ian Carr
29426913	Professor	Professor Mary Carswell
29427265	Mr	Mr Stuart Casswell
29408289	Mrs	Mrs Irene Chadwick
29712033	Mrs	Mrs Clare Chambers
33214913		David Chambers
33215297		Sally Chambers
29447713	Mrs	Mrs Charlotte Chapman
33215425		Candy Charters
29447265		Steve Charters
29380513	Mrs	Mrs Marie Chater-Cripps
32743009		Tom Chilton
33215585		Tom Chilton
30446625	Ms	Ms Lyn Churcher
32724449	Mr	Mr Chris Churches
33215809		Jack Clare
33215873		Jan Clare

Respondent ID	Respondent Title	Respondent Name
32692449	Mr	Mr Roger Clare
33216001		Roger Clare
33216033		Sadie Clare
30584033	Mr	Mr Bob Clarke
30794433		Sarah Clarkson
29446177	Dr	Dr Juliet Coleman
27186849	Mr	Mr Julian Coles
29447201		Iain Colville
30507297	Mr	Mr Alan Condon
32595009	Mrs	Mrs Carolyn Coole
29420193		Andy Cosgriff
29089249	Miss	Miss Laura Coxon
30541121		Ann Coy
29447393	Mrs	Mrs K Cragg
29782049	Mr & Mrs	Mr & Mrs Brian & Susan Crawford
30446273	Mr	Mr G M Creedy
30487873	Ms	Ms Sue Creedy
33216161		David Crines
29330785	Mrs	Mrs Heather Crowe
29841633	Mr	Mr Neil Crowe
30446529		K J Crutchley
32729345	Mr	Mr Adrian Cudmore
27226945		A A H Cunningham
33216353		Belinda Curtis
28579521	Dr	Dr Mat Daniel
33216449		Alessia D'Artibale
29551873	Ms	Ms Pauline Davidson
27225537	Mr	Mr Stewart Davidson
30040225		Justine Davies

Respondent ID	Respondent Title	Respondent Name
27219233	Mr	Leaves of History (Mr Russell Davies)
32692801	Miss	Miss Suzanne Davies
33090817		Juliette Davis
30029537	Mr	Mr Peter Davison
30446497	Mrs	Mrs K Daw
27192417	Miss	Miss Jan Deebank
29314369	Miss	Miss Elizabeth Denial
33362305		William Dewick
29222721	Mrs	Mrs Annie Dickinson
29171809		Jeff Dickinson
32280033		Helen Dixon
33362561	Mr and Mrs	Mr and Mrs Philip & Catherine Dixon
29446497	Mrs	Mrs Hannah Dolby
29422177	Miss	Miss Angela Donald
32615297	Mr	Kase Aero Ltd (Mr Melvyn John Dougan Dougan)
30031233	Mr	Mr Peter Duffell
33665473		Laura Duke
33363105		James Duncan
30407137	Mr	Mr Alan Durkan
27212961	Dr	Dr Paul Dyer
27184961	Ms	Ms Celia Easteal
29395745	Mr	Mr Steven Eatherington
32671393	Mrs	Mrs Sally Edwards
29691041	Mrs	Mrs Nicole Elders
30104577		Aj Ellahi
30058113		Suzanne Ellahi
29430593	Mr	Mr Brian Elliott
27217345	Mr	Mr Richard Elliott
32729697	Mr	Mr Pete Ellis

Respondent ID	Respondent Title	Respondent Name
29430753	Mr	Mr Anthony Ellison
33519553	Mr	Mr Paul Elphick
32659233	Mrs	Mrs Susan Enright
32738273	Mr	Mr Andrew Evans
29271201	Mr	Mr Jonathan Evans
32671361	Mr and Mrs	Mr and Mrs A Everett
30039873	Mrs	Mrs Keith Farmer
30057761	Dr	Dr Nidal Farraj
29428225	Mr	Mr Daniel Farrell
29612513	Mr	Mr Ben Fern
30508225	Mr	Mr H A Ferrier
29422081	Ms	Ms Sue Fielding
27212993	Mr	Mr Paul Fileman
30566113	Ms	Ms Rebecca Firth
29567745	Mr	Mr Andrew Fletcher
29414657	Mr	Mr Graham Fletcher
29356385	Mrs	Mrs Mandy Fletcher
27179265	Dr	Dr Alan Folwell
29440929	Mrs	Mrs Susan Folwell
32252673	Mrs	Mrs Jane Fowlie
32758721	Mr	Mr Stephen Fowlie
29782337	Dr	Dr Valerie Fraser
29711009	Mrs	Mrs Diane Freer
30081217	Ms	Ms Kelly Frith
29605537	Mr	Mr Adrian Furlonger
29302081	Mr	Mr Paul Gale
33520225		Gordon Garrick
29399649		Zoe Gascoigne
33520385		Ailsa Gater

Respondent ID	Respondent Title	Respondent Name
29446305	Mrs	Mrs Lorraine Gerry
32659937	Mr	Mr Kevin Gibbons
30484385	Mr	Mr Robert Gibson
29413825		Carol Gilchrist
30039329	Mr	Mr Stuart Gilpin
29566305	Mr	Mr Richard Glazebrook
29344353	Mrs	Mrs Rachel Goldby
29344769	Mr	Mr Jonathan Good
32654305		Natalie Good
29423521		Anthony Goodwin
33520481		Rob Gornall
33520513		Isaac Gosling
28601697	Mrs	Mrs Annie Gosnell
30138209	Mr	Mr Ian Grantham
29711233	Miss	Miss Nicola Gray
33520609		Stuart Greaves
28957217		Natasha Green
29367137	Ms	Ms Karen Greenaway
32953249		V M Greene
30057985		Nick Gregory
27190657	Mr	Mr David Griffiths
29578721	Mr	Mr Richard Groves
30185889		Fiona Gullis
30794177	Mr	Mr Robert Gullis
29709985	Miss	Miss Janice Hackman
29826401	Mrs	Mrs Suzanne Haigh
29347137	Mrs	Mrs Jo Hale
29445729	Mrs	Mrs Alison Hall
29392001	Mrs	Mrs Linda Hammond

Respondent ID	Respondent Title	Respondent Name
29558497	Mr	Mr Steve Hampson
29430433	Mr	Mr Ian Hanney
32669313	Mr	Mr Nicholas Hardy
29438337	Mr	Mr Michael Harris
33520705		Michelene Harris
33520737		Brian & Brenda Harrison
32964641		Louise and Glen Hartley and Cannell
27202209	Mr	Mr James Harvey
33520769		Edward Hayden
33665281		Georgia Hayden
28885569	Mrs	Mrs Alison Haynes
33665313		Thomas Heap
32757953		Rachel Heaven
32669697	Mr	Mr Jim Hegarty
29399041	Ms	Ms Caroline Hennigan
29413601	Mrs	Mrs Samantha Hepworth-Bourne
27201985	Mr	Mr Jon Hermon
29566817	Mr	Mr John Herrington
32729793	Ms	Ms Susana Hidalgo Hogg
32643361	Dr	Dr Frederick Higon
30088321		Russell Hodges
29430881	Prof	Prof Eef Hogervorst
32729761	Mr	Mr Robert Hogg
30090113		Mike Hollands
29446369	Mrs	Mrs Jennifer Hollingshead
30082625	Miss	Miss M J Holme
29062369	Mr	Mr Andrew Holmes
29552961	Mrs	Mrs Annabel Holmes
29990337	Ms	Ms Kathleen Holmes

Respondent ID	Respondent Title	Respondent Name
27209281		Mike Hope
29081953	Ms	Ms Hilary Hopkin
30483585	Mr	Mr Martin Hoskins
32763297		Pippa Hothersall
30541089	Mr	Mr C Houghton
30541057		Elizabeth Houghton
30543681		Andrew Hounslow
30543713		Anne Hounslow
29561569	Mr	Mr Keith Howard
27193057		Frances Howatson
30519297		Norma Howitt
30519201	Mr	Mr Paul Howitt
30418561	Mr	Mr Daniel Hoye
30446593		Lydia Hoye
29062721	Mrs	Mrs Rebecca Hulme-Edwardson
29562625	Mr	Mr Julian Humpheson
32669217	Mrs	Mrs Emily Humphreys
33665345		Samantha Humphreys
29430049	Miss	Miss Gemma Hunt
32593249	Dr	Dr Roger Ibbett
30543841	Mrs	Mrs J H K Iley
30543809		Peter Iley
29428801	Mr	Mr Alexander Ison
32964481	Mr	Mr Kevin Jackson
29309825	Miss	Miss Joanna Jagiello
27219649	Mrs	Mrs Sarah James
29430785	Mr	Mr Tom Jayamaha
29267969		Linda Jepson
29696673	Mrs	O & C Johnson (Mrs Charlotte Johnson)

Respondent ID	Respondent Title	Respondent Name
29445857	Mr	Mr Jim Johnson
27208833	Mr	Mr Michael Johnson
29429441	Dr	Dr Michael Johnson
29707617	Mr	Mr Oliver Johnson
29559841	Mr	Mr William Johnson - Marshall
29283457	Mr	Mr David Jones
29427969	Mrs	Mrs Jane Jones
29558657	Mrs	Mrs Samantha Kearn
30031841	Mrs	Mrs Karen Keay
30031649	Mr	Mr Paul Keay
29614081	Miss	Miss Sarah Keep
33665409		Ruth Kelson
29294785	Mr	Mr Chris Kemp
32639777		Ruth Kemp
33665441		Denise Kennedy
32759745	Ms	Ms Maxine Kent
29433153	Mr	Mr Richard Kenward
29447585	Mrs	Mrs Catherine Kershaw
29430689	Ms	Ms Diana Korolus
29222657	Mr	Mr Philip Kynaston
32130689	Ms	Ms Clare Lacey
33665505	Mrs	Mrs Emily Landsborough
33665569		Ali Langton
33665633		Anne Laskowski
33665601		Jacek Laskowski
30446241	Ms	Ms Emma Lawton
30508257		T Leach
30483937	Ms	Ms Penny Leadbeatter
30487905		T Leadbeatter

Respondent ID	Respondent Title	Respondent Name
29430081	Mr	Mr Edward Lee
29430113	Mrs	Mrs Helen Lee
32740897	Miss	Miss Gillian Leigh-Browne
31442753		Hayden Lester
29446561	Miss	Miss Chloe Lewington
29425089	Mr	Mr Simon Lindsay
30794337		Suzy Lindup
30039809	Mrs	Mrs Helen Lister
30507617		Greig Littlefair
30487841	Ms	Ms Samantha Littlefair
32658785	Mrs	Mrs Alice Lloyd
29387425		Daniel Lloyd
33665665	Ms	Ms Rebecca Lloyd
33665697	Mrs	Mrs Anastasia Lock
33665729	Mr	Mr Gilbert Lock
29826113	Mr	Mr John Lockwood
27183073	Mr	Friends of Sharpill Wood (Mr William Logan)
29427937	Mr	Mr Greg Longley
29186689	Mrs	Mrs Alison Loose
30794305		Pam Loughna
32691873	Mrs	Mrs Sarah Lowe
30673057	Mr	Mr Steve Lowe
27208929	Mr	Mr Michael Lyons
29428321	Mrs	Mrs Fiona MacDonald
32759905	Miss	Miss Lisa Mace
29446433	Mrs	Mrs Deborah Mack
29225441	Miss	Miss Paris Mackenzie
29400993	Mr	Mr John Magiera
33665761		Louise Maloney

Respondent ID	Respondent Title	Respondent Name
33665793		Richard Marriott
29456385	Ms	Ms Lynne Marshall
30484225	Mr	Mr Philip Marshall
30185665		Dawn Martin
32709313		Claire Martindale
27214753	Dr	Carlton and Gedling U3A (Dr Paul Martinez)
30483841	Ms	Ms Katie Mason
29429985		Brett Masterson
32968513		* Mather
32670145	Mr	Mr Andy Mattison
29446401	Ms	Ms Rebekah Maxwell-Atkin
30541025		Gillian McCartney
30540993		Tim McCartney
32705377	Mr	Mr Frank McCarthy
33665857		Ann McCartney
29595329	Mrs	Mrs Carol McDermott
29347105	Mr	Mr Stephen McDermott
27200353	Mr	Mr Justin Mclarney
27202369	Mrs	Mrs Jude Mclaughlin
33665889	Mr	Mr Michael Mclaughlin
33366593	Mrs	Mrs Teresa McMahan
30185473	Dr	Dr Stephen McNeeney
30543777		David Mehigan
32709537	Mr	Mr Alan Mercer
30446433		J Merryweather
29747489	Miss	Miss Jennifer Michael
32342849	Mr	Mr Phil Miller
32674753	Mrs	Mrs Sadie Milner
30520129		Steve Molyneux

Respondent ID	Respondent Title	Respondent Name
30520321		Su Molyneux
29427457	Mr	Mr Adrian Moore
30090433	Mr	Mr Chris Moore
29406209	Mrs	Mrs Tina Moore
29425121	Mr	Mr Joseph Moran
33665953		Graham Moreland
27185025	Mr	Mr Chris Morffew
33665985		Rachael Morgan
32635425		Ruth Morgan
29711841	Mr	Mr Christoher Morley
29710785	Mrs	Mrs Cora Morley
29408097	Mrs	Mrs Donna Morley
30507969		Cathryn Morris
27188289	Mr	Sharphill Management Services (Mr Dave Morris)
29551041	Mr	Mr David Morris
30508033		David Morris
29417857	Mrs	Mrs Katy Morris
32964769	Miss	Miss Sara Moulds
29594177	Ms	Ms Astrid Moules
29336929		John Muddeman
28994177	Mr	Mr Atif Muneer
28614209		Daniel Murphy
28985665	Mr	Mr Daniel Murphy
29565953	Mr	Mr Simon Napier
29431745	Mrs	Mrs Karen Need
32965729	Mr	Mr Paul Needham
33666017	Mrs	Mrs S Needham
29188065		David Nelson
29612769	Ms	Ms Caroline Newton

Respondent ID	Respondent Title	Respondent Name
30484001	Mr	Mr Patrick Newton
32725185	Mr	Mr Robert Newton
29553217	Mrs	Mrs Maria Nicholas
33719361		Lucy Nicholson
33719425		Richard Nicholson
29399521	Mr	Mr Rance Noon
30058209		Alexandra Norman
30090337		Andrew Norman
32144833	Ms	Ms Michelle Norman
29413281	Mrs	Mrs Helen Norton
27223809	Ms	Ms Terri Nuckowski
33719649		Paschal O'Hara
27187105	Mr	Mr Conrad Oatey
30118849	Mr	Mr Anthony O'Brien
30119169	Mrs	Mrs Julie O'Brien
29595073	Ms	Ms Sarah O'Flynn
33719585		Graham O'hara
27192801	Mrs	Mrs Fiona Oliver
29430017		Zena Oliver
29446529	Mrs	Mrs Leonie O'Neill
27196225	Mr	Mr Frederick Owen
29412385	Mrs	Mrs Gwynneth Owen
29447521	Mrs	Mrs Julie Owen
29446593		Markus Owen
32746049	Professor	Professor John Owers-Bradley
32738689	Mrs	Mrs Lindsey Owers-Bradley
29711777	Mrs	Mrs Sophie Oxby
33719681		Aimée Palace
32738241	Dr	Dr Monica Pallis

Respondent ID	Respondent Title	Respondent Name
32590305	Dr	Dr Sally Palser
29297185	Mr	Mr Richard Pannell
33719809		Robert Parker
29594465	Mr & Mrs	Mr & Mrs David & Elaine Parry
30508097	Mrs	Mrs M Parvin
32643745	Mr	Mr Dan Patterson
29223585	Miss	Miss Rebecca Paxton
32522305	Miss	Miss Nicola Payne
32741217	Professor	Professor Frazer Pearce
28692065	Mr	Mr Stephen Pearson
30092417		David Peck
32724801	Ms	Ms Jacqueline Peet
30725857	Ms	Ms Winifred Pell
29711137	Mrs	Mrs Maria Penniston-Hill
27213601	Ms	Ms Babs Perkins
29343201	Mr	Mr Christopher Perry
29562657	Mr	Mr Ray Pettit
30089537		Brian and Christine Pheasant
32624449	Mrs	Mrs Jan Phillips
29420673	Mr	Mr Paul Phillips
29367361	Mr	Mr George Pickering
33719873		Laura, Simeon and Olivia Pickles
29345985	Mrs	Mrs Jane Piggott
27184545	Ms	Ms C Pimblett
32969313	Mr	Mr Andrew Pirie
33723489		Ben Pointer-Gleadhill
32706017	Mrs	Mrs Claire Pointer-Gleadhill
30045057	Miss	Miss Alison Pover
29421761	Mr	Mr Mervyn Powdrill

Respondent ID	Respondent Title	Respondent Name
29822081	Mrs	Mrs Pam Powell
30121953	Mr	Mr Timothy Powell
30519553		Catherine & Ian Powell and Wallace
32643489	Miss	Miss Georgina Preston
27192353	Mrs	Mrs Emily Quilty
29300353	Mr	Mr Adam Quincey
33723649		Karen Rainford
33723713		Keith Rainford
30543937		Richard Reed
29427329	Mr	Mr Dave Reeder
29445345	Mrs	Mrs Jill Reedman
29431425	Mr	Mr Paul Reedman
30040321		Glenn Reid
32593889		David Rennie
30446561	Mr	Mr Lionel Reyes
32708577		David Rhead
29445473	Mrs	Mrs Davina Ripton
32141089		Michael Rivett
29690721	Dr	Dr Isabella Robbins
27187393	Mr	Mr John Robertson
32669025	Mr	Mr Andrew Robinson
27194977	Mr	Mr Brian Robinson
33723777		Rachael Robinson
29692097	Dr	Dr Christopher Rochelle
27197537	Mr	Mr Jack Rodber
29406401	Mrs	Mrs Nicola Roe
30029441	Miss	Miss Wendy Rolls
27183393	Mr	Mr Robert Rouse
27197729	Mr	Mr James Rushton

Respondent ID	Respondent Title	Respondent Name
30483745	Mr	Mr Mike Salkeld
28665953	Mr	Mr David Savidge
33724737		Jane and Steve Savva
30520481	Dr and Mrs	Dr and Mrs C & C Sawdon
29430625	Dr	Dr Grit Scheffler-Ansari
33724769		Michael and Susan Scott
30507777	Mr	Mr Martin Seabrook
33724865		Barbara Sharp
29561441	Mr	Mr Paul Sharpe
32829153	Mrs	Mrs Ruth Shaw
30097473		Christopher & Nadine Sims
27188865	Mr	Mr David Sims
29428417	Mrs	Mrs Sue Sims
32692001	Mrs	Mrs Celeste Sinclair
33724993		Celeste Sinclair
33725217		Mike Sinclair
29343745	Mrs	Mrs Joy Slade
30810497	Mr	Mr Brian Smith
27185537	Mr	Mr Christopher Smith
29606017	Mr	Mr David Smith
27202305	Mr	Mr James Smith
29558049	Mr	Mr Jeremy Smith
27203425	Mr	Mr Keith Spencer
33725665		Sharon Squires
32660609	Mr	Mr Daniel Stacey
27196545	Miss	Miss Helen Stanbrook
30058017	Miss	Miss Louise Stanbrook
29447809	Mr	Mr Jack Starr
29446465	Mrs	Mrs Lizzie Starr

Respondent ID	Respondent Title	Respondent Name
33725921		Gill Stevenson
32126817	Mr	Mr Derrick Stone
30158433		Howard Stone
30158145		Mary Stone
29341569		Steven Strachan
32964897	Mrs	Mrs H Strasburger
29369089	Mr	Mr R Strasburger
29268001	Dr	Dr Nigel Sturrock
29268033	Dr	Dr Susan Sturrock
29324705	Mr	Mr Oliver Styles
30044769	Mrs	Mrs Rosalind Sulley
28605377	Mr	Mr George Sullivan
29442433		Alex Sutton
32591361	Mr	Mr Graeme Swadling
29564289	Mr	Mr Ian Sweeney
30553409	Ms	Ms Natalie Swiderska
29343361	Mr	Mr Malcolm Swift
29567681	Dr	Dr Daniel Symes
29364161	Professor	Professor Michael Symonds
30104033	Mrs	Mrs Tracey Taft
29446337	Mrs	Mrs C Taylor
30446209	Mr	Mr Ed Taylor
30089985		Sheila Taylor
29429409	Miss	Miss Sophie Taylor
27212321	Mr	Railfuture (East Midlands Branch) (Mr Phil Thomas)
33726017		Peter Thompson
29826529	Mr	Mr Andrew Thornton
29709313	Mrs	Mrs Tahmina Tinsley
32670369	Dr	Dr Jacqueline Tivers

Respondent ID	Respondent Title	Respondent Name
33726177		Charles Todd
33726337	Mr	Mr James Tolhurst
30446465	Prof	Prof John Tomlinson
33726465	Mrs	Mrs Sue Tompkins
29414081	Mrs	Mrs Jean Tongue
27226401	Mr	Mr Martyn Tongue
33726561		Jane Tormey
27220129	Ms	Ms Sian Trafford
27225345	Ms	Ms Michaela Treis-Goodwin
33726817		Fran Tristram
29269377	Mr	Mr Mark Trought
32594913		Lisa Tucker
29445665	Mrs	Mrs Sandra Tuckwood
29847393	Mr	Mr Gary Tustin
29442497	Dr	Dr Theresa Tyers
33727073		John Vanhegan
30032001	Mrs	Mrs Stevie Vanhegan
29405729		Laura Veide
29425249	Mrs	Mrs Nikki Velinsky
31788577	Mr	Mr Sunil Vidhani
32717409		Luke W
33362913		Elliot Wade Dodson
29112129	Mr	Mr Dan Wakefield
30082209		John Wakefield
30090401		Wendy Wakefield
29593793	Mr	Mr Adam Walker
29593537	Mr	Mr Graham Walker
30483681	Mrs	Mrs Mary Walker
29594017	Mrs	Mrs Patricia Walker

Respondent ID	Respondent Title	Respondent Name
32670241	Mr	Mr Philip Wall
33090721	Mr	Mr K Wallace
29371169	Miss	Miss Michelle Walshe
30446049	Ms	Ms Charlotte Walters
29430849	Ms	Ms J Wand
29360545	Prof	Prof Christopher Ward
30159201		Penny Ward
29710913	Mrs	Mrs Diane Wardle
29428993	Mrs	Mrs Sandra Warhurst
29595137	Mr	Mr Joseph Watson
29442849	Mrs	Mrs Linda Watson
27187681	Mr	Mr Clifford Way
33727201	Mr	Mr A. T Wayman
32391233	Mr	Mr Michael Webster
29614593	Mrs	Mrs Karen Weeks
29614177	Mr	Mr Alex Wells
27203041	Mrs	Mrs Kathryn Wheatley
29104929	Mr	Mr David Wheeler
30543617		Alex Whitcher
30543553		Conrad Whitcher
29061473		Claire White
32693889	Mrs	Mrs Therese Whitehall
30543649		Alicia Whiting
30507841		Blake Whiting
30507745		Karen Whiting
30507809		Vince Whiting
33727585	Mr	The Whittington family (Mr W Whittington)
30031425	Mr	Mr Richard Widdowson
29437057	Mr	Mr Keith Wignall

Respondent ID	Respondent Title	Respondent Name
29711425	Mr	Mr Paul Wike
32545089	Ms	Ms Ann Wilkes
33366369	Ms	Ms Sylvia Wilkins
29436257	Mr	Mr Adam Wilkinson
30504545		Lorraine Wilkinson
33727777		Kate Wilkinson Earl
29737857	Mr	Mr Glynne Williams
30086081	Dr	Dr Keith Williams
33727841		Bryony Willing
30397057		D M Wilson
27218593	Mr	Mr Robert Wilson
30508289		T Wilson
29605825	Mr	Mr John Winfield
29400065	Mrs	Mrs Susan Wing
33728161		Ben Wood
32643265	Mr	Mr Chris Wood
29422753	Mrs	Mrs Sheila Wood
29565089	Mr	Mr William Woolley
27198913	Dr	Dr Janet Worrell
29210657	Mr	Mr Phil Worville
29406177		Sarah Would
32969185	Mr	Mr Alan Wright
29606369	Mrs	Mrs Caroline Wright
32969089	Ms	Ms Emma Wright
29606561	Mr	Mr Paul Wright
30099553	Mrs	Mrs R Wright
32969121		Unn Wright
28524737		Chris Yeung

334 responses were received from respondents which are not listed above. These were either anonymous responses who responses where no GDPR consent was received. Their responses are summarised within the Report of Responses.

Two petitions were also received relating to R05 South of Orston and R07.1 Land at Regatta Way. The objections raised within the objections are summarised within the Report of Responses.