

Preferred Approach Site Selection Report

December 2022



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1.0 Introduction

- 1.1 Following the adoption of the Aligned Core Strategies for Broxtowe, Gedling and Nottingham City Councils in September 2014 and Rushcliffe Core Strategy in December 2014 the partner councils have been working together on the review, the Greater Nottingham Strategic Plan. One of the key tasks that the Strategic Plan will perform is to identify and allocate new strategic sites for development as well as to confirm those existing sites with planning permission that have yet to be fully implemented to ensure they continue to deliver in future. The partner councils have identified a number of sites as part of the Preferred Approach stage. The Preferred Approach consultation document proposes a preferred planning strategy for meeting the housing and employment needs, based on a defined settlement hierarchy. This includes details of the current housing and employment supply and identifies strategic site allocations to meet any remaining need. Site specific details of the sites are also included, with key development requirements.
- 1.2 The Preferred Approach stage precedes the formal Publication stage of the Local Plan preparation for the Strategic Plan and is supported by a range of evidence which this site selection document takes into account. However, the evidence base is still evolving with some studies yet to be completed such as the Plan Wide Viability Assessment and Infrastructure Delivery Plan and this is acknowledged in the Site Selection Document. A detailed transport assessment is also being commissioned to follow on from the Preferred Approach consultation to consider the transport implications of sites proposed for allocation in the Publication Version of the GNSP. However, the evidence used in this Site Selection Document is considered proportionate for the Preferred Approach stage and the full evidence base will be provided to support the Publication version of the Greater Nottingham Strategic Plan.
- 1.3 A number of sites have been identified as being 'Reasonable Alternatives'. These are sites which are located within or adjacent to existing built up areas of Nottingham, adjacent to the sub-regional centre of Hucknall and key settlements and are potentially suitable for residential and employment development. In order to assess which of these sites will be allocated for development consideration needs to be given to a wide range of factors including amongst others:-
- Landscape and visual impact;
 - Historic environment;
 - Green Belt;
 - Flooding;
 - Biodiversity; and
 - Infrastructure.
- 1.4 In order to ensure that decisions about which of the Reasonable Alternative sites will be allocated are made in a transparent and objective way, a process of assembling relevant information and then considering this information in a

consistent manner has been undertaken. A two stage process has been used to determine firstly whether the site could be allocated and secondly recommendations made as to whether the site should be allocated in preference to other Reasonable Alternatives so that the housing need requirement is met.

- 1.5 This Preferred Approach: Site Selection Report has been prepared in tandem with the Background Papers on Housing and Employment and other key background evidence documents. The site selection process has helped identify the scale of development that can be accommodated in and adjacent to the main built up areas of Nottingham and adjacent to the sub regional centre of Hucknall and key settlements. The assessments have helped inform which of the sites are recommended for allocation.
- 1.6 The document is structured into two parts; a Report and a series of appendices. The Main Report sets out the approach that has been taken and summarises the outcome of the site selection process for Greater Nottingham. The appendices provide the detail of the site selection process for each partner council area:-
- Appendix A – Broxtowe Borough Council;
 - Appendix B – Gedling Borough Council;
 - Appendix C – Nottingham City Council; and
 - Appendix D – Rushcliffe Borough Council.

The appendices set out the decisions that have been made to arrive at the final list of sites recommended for allocation for an individual council. A key part of these appendices are the site schedules that have been compiled to inform the site selection process.

2.0 Reasonable Alternatives

- 2.1 The starting point for this work was the creation of a pool of potential sites known as 'Reasonable Alternatives'. These were sites which, in the view of planning officers, warranted consideration in order to ensure that sufficient regard was had to alternative options. This was done to ensure that the Local Plan process is robust and accords with the requirement that consideration is given to reasonable alternatives through the Sustainability Appraisal process.
- 2.2 These 'Reasonable Alternatives' have been identified through the call for sites for the Growth Options Study (2020), the Greater Nottingham Strategic Plan Growth Options consultation, the SHLAA process and the Employment Land Study (2021).
- 2.3 A sieving exercise considered the initial pool of sites and removed unsuitable sites through the application of a traffic light (or RAG rating) process to leave a shortlist of sites with a "green rating" (details are set out in the Sustainability Appraisal for the Preferred Approach). The final pool of Reasonable Alternatives has been developed using the following criteria:-

Location	<p>Sites should be within, adjacent to or close to the existing built up area of Nottingham, adjacent the sub-regional centre of Hucknall, or a Key Settlements or Other Village.</p> <p>Sites which are in isolated locations are not included.</p>
Size	<p>To be included sites need to be capable of accommodating at least:-</p> <ul style="list-style-type: none"> • 500 dwellings or 5ha • 20,000 sq. m employment <p>This ensures that the work needed to determine whether to allocate the site is proportionate to its impact on the local area and does not result in an unmanageable number of sites being included.</p> <p>The thresholds will be applied flexibly and sites which are just under the threshold may be included.</p> <p>It should be noted that sites that are ruled out for allocation on the basis that constraints reduce the size to a level which is no longer considered strategic may be revisited through the preparation of the council's part 2 local plan, in conjunction with other non-strategic sites.</p>
Planning Status	<p>Sites which do not have planning permission are included. This includes sites which were allocated by the existing adopted Part 1 and Part 2 Local Plans.</p> <p>Allocated sites with planning permission are included if development has not yet commenced or the site has not been substantially completed. Sites with planning permission may need to be allocated to ensure that their ability to deliver houses and employment in the future is appropriately protected.</p>
2022 SHLAA Assessment	<p>Sites which have been assessed as deliverable or developable or could be suitable if policy changes are included.</p> <p>Sites which have been assessed as not deliverable or developable may be included where their constraints are deemed to be such that further work may overcome them or if there is the potential that the benefits of developing the site may outweigh the impact of the constraint.</p>

2.4 In total there are 68 sites across the Plan Area which have been included as Reasonable Alternatives, as shown on the plan provided at the end of Section 6.0. A list of sites included for each partner council can be found in the relevant Appendix along with a plan showing the sites in that Council area.

3.0 Approach

- 3.1 Having identified a list of sites to be included as Reasonable Alternatives it was then necessary to consider the approach to assessing the sites. This included identifying the information required to assess the sites, identifying supporting materials such as maps and also identifying the best way to present this information in a clear way.
- 3.2 Making decisions about whether sites can and should be allocated requires that information from a range of sources is used in order to come to a balanced decision. Information was sourced from the range of evidence used to inform the Preferred Approach stage.
- 3.3 The information is presented in a series of site schedules. These site schedules include the relevant information for each site in a clear and consistent manner. Maps and photographs are also be presented in these site schedules.

Sources of Information

- 3.4 The table below sets out the information used in the site schedule, the reason it has been used and source. A brief explanation of how the evidence documents were prepared is provided below to provide background to the information presented.

Information	Reason	Source
Site name and reference	Unique and consistent name and reference number to ensure that there is clarity about which site is being discussed.	
Number of dwellings estimated employment land or floorspace	To identify the level of housing and / or employment development that is being initially considered on site.	SHLAA Review 2022 Employment Land Study (Lichfields 2021) In house Employment Land Supply information.
Existing Use	The current use of the site is recorded.	SHLAA Review 2022
Known Land Contamination	Whether there is known or likely ground contamination resulting as a consequence of previous use for e.g. former industrial land.	SHLAA Review 2022
PDL or Greenfield	The NPPF requires that the re-use of previously developed land is encouraged. In making decisions preference will be given to sites which are previously developed or contain a proportion of previously developed land.	SHLAA Review 2022

SHLAA Conclusion	The SHLAA identifies constraints to the development of the site and provides contextual information about the site such as whether it is already allocated for development or has extant planning permission.	SHLAA Review 2022
Growth Options Study conclusion	The Growth Options Study (AECOM July 2020) was commissioned to inform the Greater Nottingham Strategic Plan. This included reviewing and assessing the sustainability of settlements, the growth potential of broad locations, transport corridors, sustainable urban extensions, key settlements and stand-alone sites. The findings of the study are therefore relevant to site selection.	The Growth Options Study (AECOM July 2020)
Compliance with the GNSP Preferred Approach	Sites will be assessed for compliance with the proposed Planning Strategy in the Preferred Approach and in particular the settlement hierarchy.	GNSP Preferred Approach Planning Strategy
Plan Wide Viability	The viability of the site will be considered through the preparation of the Plan Wide Viability assessment to support the Publication version of the Greater Nottingham Strategic Plan.	Plan Wide Viability Assessment to be commissioned.
Infrastructure including: Utilities Emergency Services Education Health Blue and Green Infrastructure Community Facilities Other services (if identified)	Impact on infrastructure is an important part of making decisions. Information from the Growth Options Study will be presented on a range of types of infrastructure. Responses from infrastructure providers as part of the Consultation on the Preferred Approach will also inform an Infrastructure Delivery Plan (IDP) to be published in support of the Publication version of the Greater Nottingham Strategic Plan.	The Growth Options Study (AECOM July 2020) Infrastructure Delivery Plan (in preparation)
Sustainability Appraisal (SA)	The SA assesses sites against a range of different factors and	Preferred Approach: Sustainability Appraisal, December 2022

	scores them for their sustainability.	
Green Belt	The protection of the Green Belt is an important factor and changes to Green Belt boundaries require 'exceptional circumstances'.	Preferred Approach: Green Belt Review, December 2022
Carbon Neutrality	Sites have been categorised according to the likelihood of a location to reduce the need to travel or travel more sustainably and hence potential to reduce carbon emissions in the following order:- Within and adjoining the Main Urban Area; Edge of Hucknall; Adjoining a Key Settlement.	Further work would be undertaken at the planning application stage including full environmental analysis and application of low carbon and design planning policies.
Impact on Air Quality	Whether the site is within or near an Air Quality Management Area.	SHLAA Review 2022 with reference to the scientific officer.
Transport / Accessibility	Ensuring that sites have suitable and safe access to the road network and will not affect its operation is an important part of determining whether sites can be allocated. Detailed traffic modelling of sites to be allocated in the Publication Draft GNSP to assess the cumulative impact of travel on the highway network. Information is also provided on accessibility to community facilities by walking, cycling and public transport within 30 minutes total travel time. Information on whether community facilities are within 400 m walking distance from the edge of the site is also recorded. This provides an indication of the sustainability of the location in accessibility terms.	Transport - in house assessment with input from County Highways. Transport Assessment to be commissioned. Accessibility to services and facilities - in house assessment.
Flood Risk	The NPPF seeks to steer development away from areas at	SHLAA Review 2022

	high risk of flooding from all sources.	
Natural Environment	The NPPF requires that designated sites of nature conservation interest should be protected in line with their importance. The presence of sites of designated nature conservation interest within or in the vicinity of the site is considered important.	SHLAA Review 2022
Historic Environment	The protection and enhancement of designated and non-designated heritage assets such as Listed Buildings and Conservation Areas is a requirement of the law.	Preferred Approach: Heritage Assets Assessment, December 2022
Landscape and topography	The impact of development sites in terms of the potential impact on the landscape and visual amenity is summarised for each site and includes a score.	For all - Greater Nottingham Growth Options Study (Brindle & Green 2022) For GBC only - Landscape and Visual Analysis of Potential Development Sites (AECOM 2022)
Consultation Responses	It is important that the views of local people are taken into account when preparing the Greater Nottingham Strategic Plan. Responses made during previous consultations may provide additional relevant evidence for a certain site or broad area.	Greater Nottingham Planning Partnership Report of Consultation Responses: Growth Options (February 2022) Preferred Approach: Response to the Growth Options Consultation, December 2022

SHLAA Review 2022

3.5

The Strategic Housing Land Availability Assessment (SHLAA) is an annual review of potential housing sites. Its purpose is to help us understand where and when housing could be built in the future. Sites in the SHLAA are assessed against a range of criteria to establish their suitability, availability and achievability for development. A detailed SHLAA methodology has been agreed with the Greater Nottingham Councils to ensure a consistent approach and to clearly justify any assumptions made. Further details about the SHLAA can be found using the following link:-

[Evidence Base \(gnplan.org.uk\)](https://gnplan.org.uk)

Infrastructure and the *Infrastructure Delivery Plan*

- 3.6 As stated above an Infrastructure Delivery Plan is in preparation to identify infrastructure required to meet the spatial objectives and growth set out in the GNSP. This document will consider the key site specific infrastructure requirements of the reasonable alternative sites and the likely costs of this infrastructure and be available for the Publication Draft GNSP. For the purposes of the Preferred Approach consultation information gathered on infrastructure set out in the Growth Options Document has been used. The main purpose of this approach is to identify any infrastructure issues that may be considered “show stoppers” that would effectively result in a reasonable alternative site being ruled out unless mitigation could be achieved. It is accepted that the infrastructure requirements for the reasonable alternative sites would need to be updated and augmented with information from the service providers and published in the Infrastructure Delivery Plan which is in preparation.

GNSP Sustainability Appraisal

- 3.7 The purpose of the Sustainability Appraisal (SA) is to assess the economic, social and environmental impacts of projects, strategies or plans, so that the preferred option promotes, rather than inhibits, sustainable development. It also aims to minimise adverse impacts and resolve as far as possible conflicting or contradictory outcomes of the plan or strategy. The SA has looked at reasonable alternative options for proposed strategic site allocations.
- 3.8 The SA has assessed each of the reasonable alternative sites against the SA Framework. The SA Framework contains sixteen objectives which cover housing; employment and jobs; economic structure; shopping centres; health and well-being; community safety; social inclusion; transport; brownfield land; energy and climate change; pollution and air quality; flooding and water quality; natural environment, biodiversity and blue-green infrastructure; landscape; built and historic environment; and natural resources and waste management. The SA assessment has been undertaken for each site and a SA score against each SA objective was given to indicate whether the effect is likely to be positive, negative, uncertain or no impact.
- 3.9 The proposed strategic site allocations have been assessed against the SA Framework. The findings and outcomes of the SA of the reasonable alternative sites and proposed strategic site allocations are in the SA report. For further information, please see the separate document on the GNSP Sustainability Appraisal for the Preferred Approach.

Preferred Approach: Green Belt Review, December 2022

- 3.10 The Green Belt Review assesses how well areas of land are performing against the purposes of the Green Belt and updates previous assessments taking into account any changes such as development and allocations through Part 2 Local Plans or revised Conservation Area boundaries. The Preferred Approach: Green Belt Review (December 2022) has assessed sites against four of the purposes of the Green Belt. These are:-
- To check the unrestricted sprawl of large built up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment; and

- To preserve the setting and special character of historic towns.

3.11 Criteria for each of the four purposes were drafted to assist in assessing the value of each site using a scoring matrix. Sites were given a score from 1 (least contribution to the Green Belt purpose) to 5 (most contribution to the Green Belt purpose). The Review presents the overall score for each site. However, in making decisions about which sites to allocate it has been important to consider whether sites are so important for one of the Green Belt purposes that they should not be removed from the Green Belt.

3.12 The Review identifies those parts most and least valuable in Green Belt terms. It can then be considered whether there are the exceptional circumstances to remove sites from the Green Belt either to allow development or to be designated as Safeguarded Land. This does not automatically mean that the least valuable parts will be allocated for development. Whilst substantial weight should be given to the harm to the Green Belt, other factors such as flooding, landscape or the deliverability of sites may mean that more valuable parts of the Green Belt are ultimately allocated.

Local Transport Authority

3.13 Comments from the *Local Transport Authority* were submitted as part of the SHLAA process. Consideration of the potential impact on the operation of the road network is to be considered cumulatively through a detailed Transport Assessment. This assessment will be published in support of the Publication Draft GNSP and key findings summarised in the forthcoming Infrastructure Delivery Plan.

3.14 The accessibility of sites to community facilities within 400 m from the edge of the site or within 30 minutes travel time from the centre site (by walking, cycling and public transport) has been assessed using in-house expertise.

Preferred Approach: Heritage Assets Assessment, December 2022

3.15 This work was undertaken by officers and reviewed by Conservation officers who have an extensive knowledge of heritage assets in the Plan Area. The approach was based on guidance produced by Historic England and assesses the impact of development sites on a range of different types of designated and non-designated heritage assets including Historic Parks and Gardens, Listed Buildings, Scheduled Ancient Monuments and archaeological sites.

Consultation Responses

3.16 Consultation on the GNSP has involved a number of different stages and methods. The first stage was an Growth Options consultation which took place in the summer 2020 with an extension consultation early in 2021.

Site Schedules

3.17 As identified above, the information and supporting material for each has been presented in a series of site schedules with one schedule per reasonable alternative site. This includes the following visual material:-

- *Location Map* – a map showing the location of the site in the terms of the settlement which it would, if allocated, form part of; and

- *Aerial Photograph* – a photograph of the site taken from above showing the existing buildings, vegetation, areas of hard standing and other features.

4.0 Decision Making

- 4.1 As part of this process two key decisions have been made. Firstly, whether there are any 'showstoppers' which mean that the site should not be allocated. Secondly, whether, having regard to the available alternatives, the site should be recommended for allocation.
- 4.2 The first decision is taken with reference to the site in isolation. This determines whether the site can be allocated. This includes considering whether:-
- the site has practical and achievable means of access to the public highway;
 - if the site is within the Green Belt, there are defensible features which could be used to define the boundary of the Green Belt;
 - the site is being promoted for development;
 - there are other policy designations (such as open space or employment) and evidence suggesting the designation should continue;
 - a significant portion of the site is at risk of flooding; and
 - development of the site would cause significant harm to a number of the factors identified (such as heritage, landscape, flooding).
- 4.3 Determining whether a site should be allocated is a comparative exercise between the sites being considered. Account will need to be taken of different ways to achieve the scale of development set out in the Preferred Approach: Housing Background Paper (December 2022) and Preferred Approach: Employment Background Paper (December 2022).
- 4.4 Where it is considered appropriate to recommend allocation of a site, the whole of the Reasonable Alternative site has not automatically been recommended; rather consideration has been given to the need to retain open areas to act as buffers, for example for landscape reasons or to protect a heritage asset. Consideration has also been given to the need to use defensible boundaries to define the Green Belt; where this would result in more land than required being released consideration has been given to designating the land as safeguarded land.
- 4.5 Housing numbers are provided as a guide only; planning applications for a higher number of homes may be acceptable subject to consideration of the impact on local infrastructure and character.

5.0 Recommendations

- 5.1 Across the Plan Area, 68 sites were originally identified through the Sustainability Appraisal process as green 'Reasonable Alternative' sites which required consideration as to whether to include them in the Preferred Approach, and these are shown on the plan provided at the end of Section 6.0. The appendices for each Council include the assessments for each site and conclude whether they could be allocated and whether they should be allocated. In addition, a number of sites with extant planning permission are being recommended for allocation. This is to protect the permitted use of the site in case the planning permission were to lapse. One additional strategic site employment site is being recommended for allocation at the Ratcliffe on Soar Power Station within Rushcliffe Borough. Two additional sites, one within Gedling Borough (this comprises the extension of an existing strategic allocation) and one within Nottingham City, are being recommended for allocation for housing, as follows:-
- G03.1/G03.2PA: Top Wighay Farm – an additional 640 homes on existing safeguarded land.
 - NC1.1PA: Broad Marsh – a new site at Broad Marsh based around the former shopping centre is also included as a location for around 1,000 homes representing significant residential development. As well as the demolished shopping centre, it includes the adjoining former college site on Maid Marian Way, currently allocated for a more modest 50-100 dwellings in Nottingham's part 2 local plan.
- 5.2 These sites have been used to prepare the Preferred Approach: Housing Background Paper (December 2022) which sets out how homes will be delivered in the Plan Area.

6.0 Next Steps

- 6.1 The sites identified for potential allocation are included in the Preferred Approach consultation document. This consultation document will be issued for a period of consultation so that local residents, landowners, developers, businesses, organisations and any other individual or group can make representations on whether they support or object to the sites proposed to be allocated; comments can include support for the allocation of other sites not proposed for allocation. The comments received will be submitted alongside the formal Publication Draft of the Strategic Plan for examination by an independent Planning Inspector appointed by the Secretary of State. This examination will include Hearing Sessions run by the Inspector who may invite people who have made comments to participate.
- 6.2 Following the examination the Inspector will issue a report into whether the GNSP is sound and legal and recommend whether it can be adopted as part of the statutory Development Plan for the partner authorities. The Inspector may

recommend that it be adopted with number of modifications. Once adopted as part of the Development Plan the sites will be allocated for development. Prior to being developed a planning application will have to be submitted and considered by the respective council. The determination of the applications will include public consultation; this consultation, however, will be focussed on the detail of development and not the principle of development.

Plan of Reasonable Alternative Sites across the Plan Area

