

# Greater Nottingham Strategic Plan



## Publication Draft (Regulation 19) Statement of Consultation September 2024

Greater Nottingham  
Planning Partnership



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# 1. Introduction

1.1 This Statement of Consultation sets out the details of publicity and consultation undertaken to prepare and inform the Publication Draft of the Greater Nottingham Strategic Plan. This Statement will be updated prior to submission of the Strategic Plan to fulfil the requirements of Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, which requires a statement setting out the following:

- a) Which bodies and persons were invited by the Council to make representations,
- b) How those bodies and persons were invited to make representations,
- c) A summary of the main issues raised by the representations; and
- d) How any representations have been taken into account.

1.2 The consultations which have been undertaken to inform the Publication Draft are listed below:

- Growth Options (July 2020 and February 2021)
- Preferred Approach (January 2023)
- Distribution and Logistics Preferred Approach (September 2023).

## **Growth Options (July 2020 and February 2021)**

1.3 The Growth Options consultation asked questions on housing growth, employment growth and economic development, climate change and carbon neutrality, Green Belt, city and town centres, the natural environment, urban design, the historic environment, safe and healthy communities and infrastructure provision. This consultation also invited views on potential broad areas for growth and sites.

1.4 The first consultation was undertaken for 10 weeks between 6th July and 14th September 2020. 4,228 individual comments were submitted from 627 respondents.

1.5 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. 893 individual comments were submitted from 272 respondents.

## **Preferred Approach (January 2023)**

1.6 The Preferred Approach consultation focused on the distribution of housing and employment provision and identified strategic sites. The document included a proposed vision, objectives relating to housing and employment and a planning strategy. It also included details of the housing and employment supply and identified strategic site allocations to meet any remaining need.

- 1.7 The consultation ran from 4th January 2023 to 14th February 2023. 830 individual comments were received from 184 respondents.

### **Distribution and Logistics Preferred Approach (September 2023)**

- 1.8 This consultation focused on the approach to strategic distribution and logistics. The consultation provided detail regarding the need for distribution and logistics development, identified existing and future supply and also identified two new allocations which would help to meet the unmet need.
- 1.9 The consultation ran between 26th September and 7th November 2023. 134 individual comments were received from 53 respondents.

### **Which bodies and persons were invited by the Councils to make representations and how were they invited to make the representations**

- 1.10 The Councils consulted a variety of organisations and individuals. The Councils hold a joint database, hosted by 'Inovem' which currently has over 3,000 members. The database can be viewed: [www.gnplan.inconsult.uk](http://www.gnplan.inconsult.uk)
- 1.11 The Councils sent emails to everyone on the joint database notifying them of each consultation and inviting them to make comments.
- Growth Options Consultation (July 2020): 1,626 emails.
  - Growth Options Consultation (February 2021): 2,116 emails.
  - Preferred Approach (January 2023): 2,425 emails.
  - Strategic Plan: Distribution and Logistics Preferred Approach (September 2023): 3,041 emails.

The joint database includes individuals and organisations who have registered an interest in the Strategic Plan or who have responded to a previous consultation and have given permission for the Councils to contact them in respect of future consultations. It also includes statutory consultees, key organisations, infrastructure providers and duty-to-cooperate partners:

- All Parish Councils, Town Councils and Neighbourhood Forums in the Greater Nottingham Strategic Plan area
- Amber Valley Borough Council
- Ashfield District Council
- Bassetlaw District Council
- British Waterways
- BT
- Cadent Gas
- Canal & River Trust
- Central Networks
- Charnwood Borough Council

- Civil Aviation Authority
- Coal Authority
- D2N2
- Defence Infrastructure Organisation (DIO)
- Derby City Council
- Derbyshire County Council
- Environment Agency
- Erewash Borough Council
- Forestry Commission
- HS2 Limited
- Historic England
- Homes England
- Leicester City Council
- Leicestershire County Council
- Mansfield District Council
- Melton Borough Council
- Ministry of Defence
- National Grid
- National Highways
- Natural England
- NET (Tram)
- Network Rail
- Newark and Sherwood District Council
- NHS and Clinical Commissioning Groups
- North West Leicestershire Council
- Nottinghamshire County Council
- Office of Rail and Road
- Severn Trent Water
- South Derbyshire District Council
- Sport England
- The Gardens Trust
- The Theatres Trust
- Western Power Distribution

1.12 Letters were sent to individuals or organisations who were held on the database but did not provide an email address.

1.13 The majority of comments were submitted via the online consultation portal. This allows individuals or organisations to make multiple comments against the relevant part of the consultation document. This results in a number of responses being recorded against one respondent.

1.14 The Councils publicised the consultations using social media including the Greater Nottingham Strategic Plan 'X' (Twitter) page, and each Council's own social media feeds which includes X and Facebook. A YouTube video was also

prepared for the Growth Options consultation and a [‘story map’ consultation summary](#) was provided for the Preferred Approach.

- 1.15 Individual Councils also publicised the consultations through their own newsletters or email circulations.
- 1.16 Copies of the consultations were held on the Greater Nottingham Partnership’s website, on the online consultation portal and paper copies were provided in libraries. Details of how people could access the documents were provided within the emails and letters sent out as part of the consultation.
- 1.17 The consultations were undertaken in accordance with each Council’s Statement of Community Involvement:

- Broxtowe Borough Council: <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/statement-of-community-involvement/>
- Gedling Borough Council: <https://www.gedling.gov.uk/media/gedlingboroughcouncil/documents/planningpolicy/documents/GBC%20SCI%20FINAL%202019.pdf>
- Nottingham City Council: <https://www.nottinghamcity.gov.uk/media/3d1a44wt/statement-of-community-involvement-june-2023.pdf>
- Rushcliffe Borough Council: <https://www.rushcliffe.gov.uk/planning-growth/planning-policy/local-plan/community-involvement/>

## 2. Growth Options (July 2020 and February 2021)

- 2.1. Broxtowe Borough, Gedling Borough, Nottingham City and Rushcliffe Borough Councils published the Greater Nottingham Strategic Plan (GNSP) Growth Options document in July 2020. The consultation documents also included the Growth Options Study (produced by AECOM) and the Sustainability Appraisal Scoping Report.
- 2.2. 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.
- 2.3. The first consultation was undertaken for 10 weeks between 6th July and 14th September 2020. 4,228 individual comments were submitted from 627 respondents. Two petitions were received relating to R05 South of Orston and R07.1 Land at Regatta Way.
- 2.4. 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. A further 893 individual comments were submitted from 272 respondents.

Chapter	Question	Number of Comments
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	2,352
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	Question	Number of Comments
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 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
<b>Total</b>		<b>5,121</b>

2.5. The Report of Consultation Responses was published in February 2022 and provided a summary of the comments received as part of the consultations.

- **Report of Consultation Responses (February 2022):**  
<https://www.gnplan.org.uk/media/mnco0kmt/report-of-consultation-responses-growth-options.pdf>

2.6. A “Preferred Approach: Response to the Growth Options Consultation” was published in September 2022 and provided the Councils’ response to the consultation comments.

- **Preferred Approach: Response to the Growth Options Consultation:** <https://www.gnplan.org.uk/media/w25l02xx/preferred-approach-response-to-the-growth-options-consultation.pdf>

### 3. Preferred Approach (January 2023)

- 3.1. Broxtowe Borough, Gedling Borough, Nottingham City and Rushcliffe Borough Councils published the Greater Nottingham Strategic Plan Preferred Approach document in January 2023. The consultation was supported by a number of evidence documents including a Sustainability Assessment, Site Selection Report, a number of background papers and other documents.
- 3.2. This was the second stage of producing the Strategic Plan and focused on vision and objectives, and the strategic distribution of housing and employment, including the identification of strategic sites that are essential to the delivery of the strategic plan.
- 3.3. The consultation took place over 6 weeks between 4th January and 14th February 2023. 830 individual comments were received from 184 respondents.
- 3.4. The sections below provide a summary of the comments received as part of the consultation and the Councils' response to these comments. It is structured according to the six chapters within the Preferred Approach and its appendices followed by comments made on supporting evidence. Any comments on the evidence base have been organised according to the document. Not all respondents are individually referenced. However, a list of the respondent organisations has been included at the start of each chapter, appendix, or supporting document.

Chapter/Document	Number of Comments
1. Introduction	39
2. Background	27
3. Vision and Objectives	82
4. Proposed Planning Strategy	106
5. Approach to Housing Need	120
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Appendix A: Preferred Sites	190
Appendix A: Additional or Alternative Sites	89
Appendix B: Housing Trajectory	27
Supporting Evidence Documents	103



## **Chapter One: Introduction**

Comments on Chapter One: Introduction were received from the following:

AA Homes and Housing Ltd, Barratt David Wilson Homes, Barwood Land, The Toton and Chilwell Neighbourhood Forum, Davidsons Developments Limited, Havenwood Construction Limited, Hallam Land Management, Mrs Hill and Mrs Plummer, JG Woodhouse & Sons, Marrons Planning, Mather Jamie, Metacre, The Nottingham Council of Mosques, Nottingham City Council, Omnivale Pension Scheme, Peveril Securities, Ruddington Parish Council and Taylor Wimpey.

One Rushcliffe Borough Council (RBC) member for the Leake Ward.

Four local residents also submitted comments on this chapter.

### **Summarised comments from statutory organisations**

Ruddington Parish Council supports the Preferred Approach.

Nottinghamshire County Council welcomes the fact that the Councils have come together to prepare a single Strategic Plan to support the sustainable growth in the Nottingham area. This will help plan for appropriate infrastructure which often crosses local authority boundaries.

### **Summarised comments from developers**

A significant proportion of comments from developers on the Introduction stated that the plan period should be a minimum of 15 years following adoption. Consideration should therefore be given to extending "the plan period" to 2040 or 2041 and thereby amending the housing need and supply figures. This would ensure greater flexibility - in the event of slippage. One housing developer suggested that an early review should be committed to if the current proposed end date of "2038" is retained.

Davidsons Developments Limited and others noted that the LDS for Rushcliffe indicates plan adoption in 2021 and is therefore out of date.

One developer commented that the Strategy should meet the needs of Greater Nottingham's diverse communities and identify places of worship and provide burial spaces within Greater Nottingham, reflecting that 12.2 % of the City of Nottingham's population comes from Islamic communities.

Another stated that although they supported the overarching strategy, the housing requirement identified in the Preferred Approach is insufficient. They also believed that there was no detail within the Preferred Approach in relation to how the Green Belt is to be addressed.

One requested clarification on whether a Preferred Approach consultation will be held on other key matters, such as climate change. It is also not clear whether this Preferred Approach consultation is a formal Regulation 18 Consultation, or an informal consultation outside of the Regulations.

A significant number of developers and landowners promoted their sites within their comments on the Introduction. Their detailed promotion of these sites is summarised alongside other representations on the preferred approach sites or additional or alternative sites (see summarised responses on Appendix A).

A developer with land in Erewash believed that GNSP should not ignore the role Erewash could play in meeting the strategic housing needs of the HMA. Focusing only on the Nottingham Main Urban Area in the current consultation overlooks the role Erewash could play in meeting housing needs in the HMA and fails to address the importance of the inter-functionality and connectivity between Nottingham and Derby. If Erewash is to be fully excluded from the GNSP, justification will need to be provided as to the rationale for this approach.

### **Summarised comments from other organisations**

The Nottingham Council of Mosques noted the lack of reference to identifying places of worship or burial space which risks inadvertent discrimination against various communities (12.2 % of the City's population comes from Islamic communities according to the recent census).

The promotion of 52,500 jobs creation is welcomed. However, there should be reservations about some jobs coming from the drinks sector in light of alcohol related illnesses, dependencies and conditions.

A RBC Leake Ward member suggested that logistics sites should have been included at this stage to understand the cumulative impacts of development. Additionally, they noted that consideration has not been given to land to be used for energy generation and expressed concerns about solar farms and their cumulative effects.

This councillor also highlighted implications of revisions to the NPPF, specifically that changes to Green Belt policy do not preclude amending Green Belt boundaries to provide other, non-housing needs, such as employment land and open space. These changes would apply to plans that do not reach Regulation 19 within three months.

### **Summarised comments from local residents**

One resident was surprised that energy generation from renewables isn't included.

Another suggested that the documents mentioned in paragraph 1.6 should be dated.

One used this section to critique the Consultation Portal as they were unable to submit comments.

Finally, one resident noted that for RBC, the plan shows sites already identified within its adopted Local Plan. Many of the sites are currently/potentially good agricultural land and/or Green Belt. Development will benefit the current landowners and house building companies. The Green Belt and in some cases the ribbon status seems to be of lesser importance to RBC than on the less intrusive 1–3-hectare sites within the existing settlements.

### **Councils' Response**

In terms of the Plan meeting the diverse needs of Greater Nottingham the Infrastructure Delivery Plan will support the plan and identify initial requirements and expectations to support housing, economic growth and leisure activity for the area.

The specific needs for places of worship and burial are more a matter for Councils to address in their future plan preparation. Support towards the aim of creating around 52,500 jobs is noted. The aim of the Greater Nottingham Plan is to support the food and drink sector in general through its employment land provision which is an important sector in the local economy. Noting that the specific issue raises reservations about the alcohol related illnesses in connection with the alcoholic drinks sector, this is not a matter than can be addressed through the strategic plan preparation process as it is more of a public health issue.

With respect to the extending the Plan period it is agreed that the Plan period should be extended from 2038 to 2041 to enable the Plan to look forward 15 years from the predicted date of adoption. The Councils' Local Development Schemes will also be updated.

With respect to the role that Erewash Borough Council can play in meeting housing need it was Erewash that decided to proceed with its own Core Strategy Review. As part of the Duty to Cooperate we continue to discuss housing issues through the Greater Nottingham Partnership and the Joint Planning Advisory Board.

In terms of insufficient housing to meet identified need, the Plan's housing target's are above the standard method figure for Broxtowe, Gedling and Rushcliffe and is based on the supply figure for Nottingham City. Further detail is provided in the Housing Background Paper.

Note support for overarching strategy and principles of 20-minute neighbourhood PA document focuses only on the vision and objectives, planning strategy, the approach to housing need and the approach to employment. Other matters including the Green Belt and low carbon issues are included in this stage of plan preparation. The Councils consulted on the Preferred Approach to strategic logistics between September and November 2023.

In terms of the sources of information such as housing needs and other documents it is confirmed that dates will be provided where documents are listed as part of the evidence base.

Site specific comments are dealt with later within this document

### **Changes Made**

The Plan period has been extended from 2038 to 2041 to enable the Plan to look forward 15 years from the anticipated date of adoption.

Housing targets have been updated and are now above the standard method figure for Broxtowe, Gedling and Rushcliffe.

## **Chapter Two: Background**

Comments on Chapter 2: Background were received from the following:

Ashfield District Council, Barratt David Wilson, Barton in Fabis Parish Council, Bellway Homes, Bloor Homes, Davidsons Developments Limited, Gladman Developments Limited, Hammond Farms, Havenwood Construction Limited, IM Land, Langridge Homes Ltd, Mather Jamie, Metacre, Nottingham Council of Mosques, Taylor Wimpey and West Bridgford Hockey Club.

Two local residents submitted comments on this chapter.

### **Summarised comments from developers**

A majority of developers noted that there are a number of documents missing from the evidence base with no anticipated publication date provided. Barratt David Wilson specifically requested a comprehensive Green Belt Review be undertaken to form part of the evidence base. Questions were raised by the developers over how the Strategic Plan can be considered deliverable when significant parts of the evidence base are missing. A number of developers encouraged flexibility to be built into the Strategic Plan to ensure deliverability.

Multiple developers commented that there had been no updated Local Development Scheme published, but that it seemed unlikely for the Strategic Plan to be adopted by the end of 2024. It was recommended that to reflect the lengthening consultation process, the plan period be extended until 2040/41.

One developer suggested that the proposed changes to the National Planning Policy Framework and its potential impacts be addressed within future versions of the Strategic Plan.

### **Summarised comments from other organisations**

Ashfield District Council noted that a number of documents are missing from the evidence base and stated that the conclusions of these studies are an important aspect of understanding the implications to Hucknall. The studies will also need to take account of the development that Ashfield District Council is proposing in their emerging Local Plan. Ashfield District Council raised concerns that mitigation measures for any new allocations around the built-up area of Hucknall have not been addressed, which has implications for the future infrastructure in and around Hucknall, including cross boundary issues in relation to Top Wighay Farm.

West Bridgford Hockey Club requested a Leisure Facilities Strategy and Playing Pitch Strategy to be provided as part of the evidence base. Nottingham Council of Mosques requested the Strategic Plan to include provision for burial spaces, or a policy which aids communities to secure places of worship.

Barton in Fabis Parish Council welcomed the progress made on the Strategic Plan and gave their support to the Strategic Plan.

### **Summarised comments from local residents**

One local resident noted that the Strategic Flood Risk Assessment was missing from the evidence base, and queried who decides on the National Planning Policy Framework. The other local resident commented that the Strategic Plan should be

abandoned, with each Local Planning Authority preparing individual Local Plans, as they believe the Part 1 and Part 2 Plan approach causes delays to the plan making process.

### **Councils' Response**

The Strategic Plan's evidence base is published on the Greater Nottingham Planning Partnership website. The policies of the Strategic Plan are developed in tandem with the emerging evidence base. The emerging evidence does not become publicly available until the documents are finalised, but they do contribute to the drafting of the Strategic Plan to ensure the policies are deliverable and informed by up-to-date evidence. In conjunction with consultation of the Publication Draft Strategic Plan, all evidence base documents will be published on the Greater Nottingham Planning Partnership website for the public to view.

The Councils agree that the Plan period should be extended, and this change has been made.

Ashfield District Council's comments are noted. The full evidence base will be published in tandem with the Publication Draft GNSP. Account has been taken of ADC's proposals where possible. Mitigation measures in relation to the proposed extension to the Top Wighay Farm site are addressed in the site-specific policy and through the determination of any planning application.

The individual Local Authorities will decide during future plan preparation whether a new Leisure Facilities Strategy and Playing Pitch Strategy is required. The Strategic Plan will include a policy that supports communities to secure places of worship.

The Strategic Flood Risk Assessment is published in the evidence base on the Greater Nottingham Planning Partnership website under 'Climate Change (including flooding)'. The National Planning Policy Framework is decided by Central Government. An SFRA Review has been completed and this determines that the SFRA remains up to date. This has been agreed by the Environment Agency and the Lead Flood Authorities.

Working on a joint Strategic Plan has numerous benefits and it is the Partnership's intention to progress with the Strategic Plan.

### **Changes Made**

The plan period has been extended to 2041.

Policy 12: Local Services and Healthy Lifestyles of the Strategic Plan supports the delivery of new community facilities where they meet a local need. This includes Places of Worship and religious instruction.

## Chapter Three: Vision and Objectives

Comments on Chapter Three: Vision and Objectives were received from the following:

Ashfield District Council, Barratt David Wilson Homes, Barwood Land, Barton in Fabis Parish Council, Bloor Homes, Ceylon Tea Growers Association, Cora (Stantec), The Crown Estate, David Wilson Homes, Davidsons, Defence Infrastructure Organisation, Derbyshire County Council, Elton Garden Village landowners, Environment Agency, Gladman Developments, Historic England, Homes England, Kingston on Soar Parish Council, Natural England, Nottingham County Council, Persimmon Homes, Ratcliffe on Soar Parish Council, Sports England and Thrumpton Parish Meeting.

Two RBC members (Gotham and Leake Wards)

In addition to the above stakeholders six local residents submitted representations on Chapter Three.

### Summarised comments from statutory organisations

Ashfield District Council acknowledged the Vision set out in the Plan and supports the majority of the Vision. However, they did raise issues regarding the focus of development adjoining the built-up area of Hucknall and at Key Settlements. In this context and the emphasis placed on 20-minute neighbourhoods it would have been useful to understand the objectives in relation to infrastructure, education and how the Plan objectives relate to the Hucknall Town Centre Masterplan.

The Parish Councils within Rushcliffe's Gotham Ward and the RBC member for this ward all support the vision, its emphasis on sustainable development and 20-minute neighbourhood concept, the need to promote economic activity and redevelopment of Ratcliffe on Soar Power Station and welcome environmental net gains to be delivered alongside development. They encourage the Plan to enhance the natural environment regardless of other forms of development. They believe the housing objective is difficult to deliver and monitor and should be more specific. Support equitable economic growth and enhancing Core City role and providing new and protecting existing local employment opportunities. Consider objective should be strengthened by discouraging development which might draw investment away from local employment.

Derbyshire County Council believe the housing objectives should refer to the importance of low or zero carbon housing which is resilient to the impacts of the changing climate.

Environment Agency welcomed and supported the proposals as laid out in the document especially with the focus on sustainable development within the Vision.

Historic England welcomed the inclusion of heritage within the vision for the wider area. Recommend amending "preserved" to "protected" in para 3.1.2 to mirror NPPF terminology.

For para 3.1.5 would welcome inclusion of sentence relating to historic environment and need to protect and enhance significance of the historic environment, heritage



assets and their setting and providing the opportunity to 'better reveal' heritage within the community and heritage tourism.

Homes England and DIO think that an encouragement to 'maximise' the amount of employment land at the Barracks is counter to the expectation throughout adopted and emerging policy that only a small amount of employment land will be provided. In contrast, the aspiration of 'maximising' employment land opportunities has more application to the Toton Strategic Location for Growth, where a significant quantum of employment land is proposed. Homes England and DIO therefore request that reference to the Barracks is removed from Paragraph 3.2.3.

EMDC is a stakeholder who is being appropriately engaged and consulted by the applicant as it develops its proposals. Homes England and DIO therefore request that the wording at Paragraph 3.2.3 (and similar instances elsewhere in the document) is amended so that the Barracks is not described as 'Development Corporation site'.

Nottinghamshire County Council notes that the Vision and Objectives for the Plan reflect existing plans for the Greater Nottingham area. Such plans include the development of HS2, the formation of a Development Corporation to support redevelopment of Toton/Chetwynd and Ratcliffe on Soar power station and major development proposals at land east of Gamston and south of Clifton (Fairham).

Natural England generally welcomes the Vision acknowledging that it places the tackling and adaptation of the impacts of climate change at the forefront of the Plan. It is also pleased to note that aspirations to enhance natural resources, biodiversity, blue & green infrastructure and landscapes are included within the Vision.

Sports Council state that it is important that all authorities are on the same time frame for evidence - Para 98 of NPPF.

### **Summarised comments from developers**

Developers broadly welcomed the vision as it seeks to secure a more sustainable and prosperous Greater Nottingham, however significant number of developers have referred to the requirement to increase the housing figures (see comments on Chapter 5: Approach to Housing Need) (meeting the City's 35% uplift and buffer) and the need to reflect this within a positive vision and objectives, which should be more ambitious and place a greater emphasis on opportunities for sustainable economic growth that will help 'level up' the Greater Nottingham area.

One landowner believed the vision and spatial strategy are too narrowly focussed, they do not adequately set out a clear long-term and effective spatial strategy and are therefore not compliant with the National Planning Policy Framework (NPPF).

Multiple developers and landowners generally supported the overarching vision for achieving sustainable development, particularly the creation of 20-minute neighbourhoods. However, according to Gladman Developments, the concept of a 20-minute neighbourhood should not be used as an arbitrary tool to restrict or limit development from happening in locations where this is not possible. For example, clusters of villages may be considered suitable and sustainable based on the available services but not meet the principles of the 20-minute neighbourhood.

A number of developers supported the settlement hierarchy but considered certain key settlements had been overlooked despite being in sustainable locations and

capable of accommodating additional housing. One supported the commitment to achieve a sustainable distribution of development by seeking sites firstly within the main built-up area of Nottingham and to a lesser extent adjoining it. However, the Vision would be strengthened by stating the importance of locations benefitting from public transport connections in the spatial distribution of future development. Another made similar comments and recommended that the Vision is amended to ensure that it recognises the important role which surrounding settlements, such as Ruddington and Gamston play in meeting the needs of the area and delivering sustainable development.

One landowner believed the allocation of their sites could assist with the GNSP, meeting its vision for growth and contributing to a sound Plan. They also align with the vision for the creation of 20-minute neighbourhoods. This is in contrast to the GNSP which does not propose any allocations within sustainable settlements that are capable of delivering the aspirations for 20-minute neighbourhoods. A re-evaluation of the distribution of growth is required to ensure the Councils are able to maintain a 5-year housing land supply and meet the housing needs of the Plan area in the period to 2038.

A landowner promoting a Sustainable Urban Extension in Broxtowe argued the emerging Vision should also include and reference Sustainable Urban Extensions to the main built-up urban area of Nottingham and the significant contribution these make to create and support existing communities by improving and delivering facilities and infrastructure. Similarly, another also supported the Vision's reference to the principles of 20-minute neighbourhoods, and believe that their site in Ruddington could enable Ruddington to become a self-sufficient 20-minute neighbourhood. Similar comments were made in respect of sites at Trowell and Cotgrave.

In relation to their land at Ruddington, a landowner noted that paragraph 3.1.2 implies that a sequential approach to distribution has been followed, however, in the majority of cases, the Preferred Approach is largely carrying forward existing housing allocations and commitments in the areas surrounding Nottingham City. As a consequence, it is recommended that the Vision be amended to ensure that it recognises the important role which surrounding settlements, such as Ruddington, play

One developer was supportive of the overall vision but noted it only includes two housing objectives to deliver high quality new housing and rebalance housing mix to create balanced communities. Emphasising the need for a clear strategy to ensure housing targets are met and concluding the Preferred Approach is neither pro-growth nor aspirational. Should include objective to comprehensively review the Green Belt boundaries and set an increased housing target that reflects Standard Method and meet need to provide for 35% Nottingham City uplift in adjoining areas which can accommodate such growth in sustainable locations.

Another developer supported the objective to support economic growth, however they recommended that the Plan period is extended in accordance with the NPPF. This comment was also made by five other landowners/developers. One of which encouraged taking a 20-year approach to ensure that future strategic scale growth is properly planned for, another quoting the NPPF considered that the Greater Nottingham Vision should look beyond the current commitments and consider a 30-year time horizon to ensure sustainable delivery of the Ratcliffe on Soar growth area.



A number of developers and landowners also advocated allocating a wide portfolio of sustainably located development sites across the plan area which have good access to local services, amenities and transport links. Many questioned the absence of allocations at Key Settlements. This will allow a greater number of areas across the borough to benefit from the local economic benefits generated from new housing developments. One noted that larger sites carry greater risk of delay and slow build out rates and should be supported by a portfolio of medium size and immediately realisable sites to guarantee the housing supply. One specifically advocated the removal of “first” from the vision in order to facilitate a wider spread of development.

One developer specifically recommended self-build housing is provided on self-build specific sites or individual plots.

A number of developers believed that the allocation of their sites would help the Greater Nottingham Authorities to meet their vision, and also help to deliver the strategy. Some requested that their site is recognised in the vision and objectives. Specific comments, promoting their sites, are summarised alongside other comments on Appendix A.

A developer highlighted the reference to “rebalancing of the housing mix”, believing the housing mix should be determined on a site-by-site basis and be reflected by market demand at the time of the application rather than any onerous policy requirements within this plan.

One city centre landowner welcomed the revised target for the Councils to be carbon neutral before the Government’s target of 2050 and the ambition to minimise the areas carbon footprint subject to any emerging policies not becoming too onerous and consequently deter investors or visitors to the City. They also stated the Plan recognises the role specialist housing such as Build to Rent (BtR) and Purpose-Built Student Accommodation (PBSA) plays in meeting an identified need. Residential uses (including BtR and PBSA), alongside office, commercial, leisure and entertainment uses located within Nottingham City Centre will provide a rich mix of uses that will promote the vitality and viability of the City Centre. Rentplus UK stated there is an urgent need for Local Policies to be refreshed to accommodate diverse affordable mixes including those such as Rent to Buy and to enable other than registered providers access to provision.

One representation of the development industry felt that paragraph 3.1 was unclear in that it is not evident what unique abundant natural resources are available in Greater Nottingham or as to who would be able to capitalise on such resources. They added that it does not seem realistic to increase the provision of landscapes or heritage in Greater Nottingham.

Another referred to the Vision recognising the need for economic development to facilitate a HS2 station at East Midlands Parkway and realise the economic growth potential of Ratcliffe on Soar Power Station but considered there was a need to balance this economic growth with housing growth and promoted their site as a new settlement at Kingston on Soar.

In relation to employment sites one representation noted that the Plan relies on existing allocations and there is a requirement for the Council(s) to consider additional sites to meet a wider range of employment needs within the study area. Another supported the economic aspirations of the Vision noting that there is a net

over-provision of 70 ha, but approach is inequitable and not aligned with the employment objective. Individual land supply needs of all four LPAs represented in this Plan should be met appropriately.

Furthermore, one developer raised concerns that paragraph 3.1.3 does not recognise the crucial role which the housebuilding sector and the strategic allocations can play in supporting the economic development of Greater Nottingham. Omnivale Pension Scheme thought that the growth potential of the M1 corridor should be recognised and supporting with Park and Ride schemes.

Four representations made similar comments that strategic logistics and distribution is not reflected in vision and importance of supporting a sub-regional economy. Two developers considered that the economic situation and changing circumstances would impact on delivery of key sites identified in the Plan including Ratcliffe on Soar Power Station and the Strategic Growth Location at Toton and advised that growth potential of larger A roads should be recognised within the vision to support strategic logistics and role in providing opportunities for new jobs.

One landowner stated the Vision recognises that the importance of cycling and walking networks and their role in connecting homes and jobs which is supported and considered that new strategic route via Bennerley Viaduct is reflected in the Vision and Objectives.

A developer felt it was unclear whether the Greater Nottingham Strategic Plan is intending to exceed such requirements set out in the Environment Act for a mandatory net gain of 10% BNG.

### **Summarised comments from other organisations**

Nottingham Council of Mosques and AA Homes and Housing Ltd. commented that the Strategy needs to meet the needs of Greater Nottingham's diverse communities. The Plan should make reference to assistance in identifying places of worship or to providing burial spaces within Greater Nottingham for those communities and people who prefer such usage. Noting deprivation scores and overcrowding, it is disappointing that the government target for housing is being ignored in the City and appropriate intensification techniques left unused. They also considered that social deprivation needs must also be addressed within the aspiration for all services to be available within 20-minute neighbourhoods. Indeed, such attention to social infrastructure is more acute in areas of higher deprivation including locations for GP services and places of voluntary sector support like places of worship.

The Nottingham Local Access Forum (NLAF) supports the vision and objectives for sustainable development to 2038 as set out in Chapter 3 particularly the reference to new cycling and walking networks and referred to the D2N2 Local Cycle and Walking Infrastructure Plan (LCWIP) which should be taken into account.

Nottingham Students Partnership felt there was a lack of planning for student expansion throughout the document despite the Vision and Objectives which seek to 'encourage the further expansion of the Universities and other higher education

establishments'. Consideration should be given to how the increase in students (a necessary part of university expansion) will be housed.

West Bridgford Hockey Club refer to the 20-minute neighbourhood concept and stated aim that certain services and provisions are provided within 20 minutes of residents. The provision of sports, leisure and recreation services and facilities is a key part of this sustainable aim and should include "sport, recreation and leisure" as a key part of the vision. Fully support the area becoming a pre-eminent sporting centre. There is a need to enhance the evidence base to include a Sports, Leisure and Recreation Needs Assessment, inclusive of a Leisure Facilities Strategy and Playing Pitch Strategy to cover the whole Strategic Plan area.

Woodland Trust considered the GNSP should include environmental principles including 50 m separation buffers between ancient woodland and new development and the protection of ancient woodland through a strong policy in the Plan.

The GNSP should require development projects to deliver 20 per cent BNG and to be maintained for a minimum of 50 years. Strong weight should be given to Local Nature Recovery Strategies.

The GNSP should set standards for high-quality green infrastructure for development. Consideration should also be given to the Woodland Trust's Access to Woodland Standard.

### **Summarised comments from local residents**

Local residents made various points including objections to housing on greenfield sites which are Grade 1, 2 or 3 agricultural rating as this does not support food independence for the UK. One resident considered the Vision was not justified and meaningless.

A number of comments related to the need to provide sufficient infrastructure including provision for education, health care, public transport including extensions of the tram. One local resident considered that a Local Cycling and Walking Infrastructure Plan (LCWIP) should be produced for the area.

Comments also included that houses especially in Rushcliffe are generally not affordable, high quality, eco, attractive or enhance the community.

### **Councils' Response**

The site selection document provides the justification for proposing additional land at Top Wighay Farm for development. The site is considered against a series of criteria embracing the GNSP strategy and infrastructure, including education. The Hucknall Town Centre Masterplan is noted. The masterplan is intended to provide a framework for future investment and recognises opportunities for regeneration and redevelopment. It is considered that the Top Wighay Farm site will support the role of Hucknall town centre.

The Housing Objective will be monitored through the use of agreed indicators and the results published annually in each authority's Authority Monitoring Report.

The Employment Objective needs to be positively worded and cannot discourage certain types of development.

In relation to the point about the Housing Objective referring to the delivery of housing which is low-carbon and resilient to the impacts of climate change. This will be covered in Objective 1 Environmentally responsible development addressing climate change – where all development would be expected to reduce causes of climate change and to minimise its impacts and contribute towards carbon neutrality. The Greater Nottingham Planning Partnership (GNPP) has procured a low carbon study which provides the evidence to support a low carbon policy. In addition, Gedling and Rushcliffe have adopted a Low Carbon and Sustainable Design Supplementary Planning Document which is a material planning consideration and will provide further guidance on the application of relevant policies. Broxtowe and Nottingham City are also currently preparing a Low Carbon SPD. In addition, Nottingham City Council's Design Quality Framework, which is a material planning consideration, contains Carbon Neutrality Criteria against which planning applications are assessed.

The Employment Objective has been updated to remove reference to Chetwynd and only refer to Toton Strategic Location for Growth.

The Plan's Vision to lead sustainable development in the region and secure a more prosperous Greater Nottingham inherently supports the Government's urban regeneration agenda.

Comments noted regarding the need for a wider range of employment. The Employment Land Study (Lichfields, 2021) recommended that further consideration be given to assessing the need for major logistics and the GNPP consulted on this in September 2023. The Strategic Plan allocated two strategic sites for logistics – at the Former Bennerley Coal Disposal Point and at the Ratcliffe on Soar Power Station.

It is recognised that in rural areas, the achievement of compact and connected neighbourhoods is not always possible. A review of Key Settlements has been carried out that includes existing Key Settlements and other potential Key Settlements. This assesses 20-minute neighbourhoods as well as a broader assessment of the availability of services and facilities within a 30-minutes travel time via sustainable transport. This has provided a fuller picture of the level of service provision in the rural area. The D2N2 Local Cycling and Walking and Infrastructure Plan was also consulted upon between December 2022 and March 2023. This plan will increase connectivity of populations to services and facilities. Allocations in Key Settlements and other sustainable settlements will be addressed in future plan preparation.

The GNPP carried out a Green Belt Review in December 2022. There is no requirement for the Boroughs to accommodate the City's 35% uplift but Broxtowe's, Gedling's and Rushcliffe's housing targets are now above the standard method.

The Plan period has been extended to 2041.

The allocation of specific self-build plots will be considered in future plan preparation.

The Vision is a high-level statement, and the identification of specific sites is more appropriately set out in the Housing Strategy.

The Greater Nottingham and Ashfield Housing Needs Assessment Update (2024) provides the evidence for the housing mix. This takes market demand into account, however market demand does not equate to housing need and the needs of all groups, including in respect of affordable housing, should be provided for by the Plan. The GNPP is required to carry out an Equality Impact Assessment of its housing policies. A housing policy which relies solely on market factors to determine housing mix is unlikely to deliver housing which meets the evidenced need or meet the requirements of the Public Sector Equality Duty.

The Greater Nottingham and Ashfield Housing Needs Assessment Update (2024) assessed the Build for Rent Sector and has been used to inform the Plan's housing policies.

Regarding student accommodation, the City Council has worked alongside the University of Nottingham and Nottingham Trent University to develop a Student Living Strategy. The Strategy focusses on ensuring that student accommodation need can be met in the City as a result of the significant increase in student numbers that the City has experienced and will continue to experience. The Strategy plans for a 2.8% per annum increase in student numbers until at least 2030. Part of the Strategy is also aimed at addressing the undersupply of student accommodation that has happened as a result of student accommodation units not matching the significant increase seen in student numbers over the last decade. The City Council rigorously monitors student development that has occurred and is in the pipeline. The Council also carries out an annual occupancy survey of student accommodation to keep an overview of accommodation in the City to ensure that its planning policies in relation to student housing are effective. To date vacancy levels in student accommodation have been low. The City Council contends that it has a robust evidence base relating to student accommodation.

The Plan does not over-provide for employment land.

Noted with regards to reference to Park and Ride sites to serve the M1, however this matter would be dealt with in the Local Transport Plan prepared by the relevant Highway Authority.

Reference to the Bennerley Viaduct cycle path is too detailed a matter for the Vision statement.

Noted with regards to housing supply, however this will be dealt with in the Housing section of the Strategic Plan.

The evidence to support sports facilities and playing pitches will be updated as part of future plan preparation. There is no plan to carry out an area-wide Playing Pitch Strategy and this would be a matter for each authority.

Standards for woodland and trees would be adopted in draft policies on Biodiversity and/or Green Infrastructure and not specifically referred to in the

Vision. The importance of Nature Recovery Strategies will be addressed in the draft Biodiversity policy and not specifically referred to in the Vision.

Noted with regards to objections to developing land which is of high agricultural quality.

Noted with regards to the delivery of infrastructure, including that for walking and cycling. This will be addressed in a specific policy and also in the site-specific policies.

Noted with regards to the design quality and affordability of Rushcliffe's housing. Rushcliffe Borough Council adopted an Affordable Housing SPD in 2022 to provide further guidance on the application of affordable housing policy and is in the process of developing an Authority-wide Design Code whose aim is to improve design quality in the Borough.

Nottingham Council of Mosques and AA Homes and Housing Ltd comments are noted. When planning for community facilities this includes places of worship or providing burial spaces.

The City Council are considering appropriate intensification techniques for housing development.

### **Changes Made**

The Vision and Objectives have been updated through the production of the plan and to update references to proposed allocated sites.

Housing targets have been updated and are now above the standard method figure for Broxtowe, Gedling and Rushcliffe.

## Chapter Four: Proposed Planning Strategy

Comments on Chapter Four: Proposed Planning Strategy were received from the following:

AA Homes & Housing Ltd, Aldergate Properties Ltd, Andrew Granger & Co, Ashfield DC, Ashfield Independent Councillors, Barratt David Wilson Homes, Barratt David Wilson Homes, Barton in Fabis Parish Council, Barwood Development Securities, Barwood Land, Bellway Homes, Bloor Homes, C E, Canal & River Trust, CEG Land Promotions (UK) Ltd, Ceylon Tea Growers Association, Cora, The Crown Estate, David Wilson Homes, Davidsons Development Limited, East Leake Parish Council, Elton Garden Village Landowner, Erewash Borough Council, Gladman Developments Ltd, Gotham Parish Council, Conlon Construction Ltd, Hall Construction Services Ltd, Hallam Land Management Limited, Hammond Farms, Harworth Group, Harworth Group Plc, Havenwood Construction Limited, Havenwood Construction Limited, Historic England, Home Builders Federation, Homes England, Homes England and the Defence Infrastructure Organisation, John A Wells Ltd, Keepmoat Homes, Kingston on Soar Parish Council, Langridge Homes Ltd, Lidl GB LTD, Mansfield District Council, Marrons Planning, Mather Jamie Ltd, Metacre, Midlands Land Portfolio Ltd, Mulberry Land, National Highways, Natural England, Newton Nottingham LLP, Nottingham Council of Mosques, Nottingham Local Access Forum, Nottinghamshire County Council, Oxalis Planning, Parker Strategic Land Limited, Persimmon Homes, Radcliffe on Trent Parish Council, Ratcliffe on Soar Parish meeting, RBC Leake Ward members, RBC Gotham Ward member, Ruth Edwards MP, Samworth Farms Ltd, Sport England, Stagfield Group, Strawson Group Investments Ltd, Taylor Wimpey, Thrumpton Parish meeting, Trinity College Cambridge, Victoria Centre, West Bridgford Hockey Club, Wheatcroft Farm Ltd, William Davis, and Woolbro Morris.

Representations on Chapter Four were also received from two RBC Councillors (Gotham and Leake Wards) and from nine local residents.

### Summarised comments from statutory organisations

Natural England and the Canal and River Trust highlight the importance of maximising opportunities to enhance blue & green infrastructure and of incorporating it into new developments. Natural England suggest that the plan should also reference Natural England's Green Infrastructure Framework. The Canal and River Trust state that towpaths are an integral element of the infrastructure needed to encourage and achieve greater connectivity and that waterside area-based regeneration schemes can support quality of life and encourage sustainable transport. The water network has biodiversity and historic value and all of the canals in the Plan area should be acknowledged as being non-designated heritage assets.

Nottinghamshire County Council (NCC) and Sport England support the 20-minute neighbourhood approach and highlighted the important connection to health. NCC state that a reference should be included to supporting development which can best support improvement of the Greater Nottingham transport network.

Erewash Borough Council and Mansfield District Council support the approach. Ashfield District Council support the strategy and settlement hierarchy but do not consider that it is reasonable to continue to allocate additional sites on the edge of Hucknall due to the distance from services and the infrastructure constraints.



National Highways state they have no objections in principle to any of the preferred sites but highlight the need for a robust transport evidence base to determine the cumulative traffic and transport impacts of proposed allocations, and the identification of the necessary highway infrastructure to accommodate this growth.

Historic England state that it would be beneficial for a clause to be included in paragraph 4.2 to maximise the value of the historic environment, heritage tourism and protecting/enhancing the significance of heritage assets including their setting.

A number of parish councils in Rushcliffe support the preferred approach for sustainable development and the settlement hierarchy and support the plan to transform Ratcliffe on Soar Power Station into an international centre for the development of zero carbon technology. However, Radcliffe Parish Council raise concerns regarding the existing level of development in the village without adequate infrastructure to support the expansion in population. It is stated that new development should be close to areas of industry and where there are employment opportunities, to reduce the carbon footprint, reduce the likelihood of dormitory estates and thereby minimise congestion on main roads.

## **Summarised comments from developers**

### **Overall Strategy**

A number of developers support the approach of making the most of existing infrastructure and public transport through concentrating development in or adjoining the main built-up area of Nottingham and at key settlements. However, some representations did not support development adjacent to the sub regional centre of Hucknall due to infrastructure constraints and as Hucknall was outside of the Strategic Plan area. A developer also considered that there is no clear evidence available which supports the approach that urban areas of Nottingham should be prioritised over other locations within Greater Nottingham.

Responses objected to the strategy, stating it is too narrowly focussed and fails to identify a sufficient mix and supply of sites for housing. Other responses objected and stated the strategy should pursue a more dispersed approach, allowing development to be located across the region, including at other settlements, rather than solely concentrating on existing urban areas. Other responses stated that the strategy would fail to increase the supply of affordable homes.

A number of responses supported reference to 20-minute neighbourhoods. One response stated that there should be specific reference to food stores and the concept of neighbourhoods needs to be defined. However, other responses questioned how the 20-minute neighbourhood approach would be achieved without providing further allocations and also stated that the 20-minute neighbourhood approach should be considered as an aspiration in appropriate locations, rather than as a requirement to enable a site to be considered suitable for development.

A developer considered that, with high deprivation scores and overcrowding, it is disappointing that the government target for housing is being ignored in the City and appropriate intensification techniques left unused.



A response considered that the absence of a strategy for logistics does not represent a 'joined up' approach to planning for the Greater Nottingham area and does not encourage sustainable economic growth.

### **Settlement Hierarchy**

Responses stated that the Settlement Hierarchy should be amended to reflect the Planning Strategy to read as follows: a) the main built-up area of Nottingham; b) adjoining the main built-up area of Nottingham; c) adjacent to the Sub Regional Centre of Hucknall; and d) Key Settlements. Other responses also highlighted that the settlement hierarchy at paragraph 4.2.2 does not clearly reflect paragraph 4.2.1 of the consultation document or paragraph 3.1.2.

The restricted future role of Key Settlements was raised as a significant concern, and it is suggested that Broxtowe and Rushcliffe should have the same approach to Key Settlements as Gedling.

A response considered that housing requirements should be set for Key Settlements and for small scale sites which would be identified at Part 2 Local Plan stage. A response suggested that the wording in paragraph 4.2.3 (development to be defined in subsequent Local Plans will be "smaller scale") should be clearly defined to avoid misinterpretation of what type of site it considered smaller scale. Another response considered that key settlements closest to Nottingham, and with better public transport access, should be prioritised in the settlement hierarchy, over key settlements without such benefits.

A response also highlighted the importance of rural settlements to meeting the overall housing need.

### **Need for Additional Sites**

A significant number of responses expressed concern regarding the approach to allocating sites and considered that additional land or sites needs to be identified in order to meet housing need. Reference was also made to the need for the Borough Councils to meet Nottingham City's unmet need.

The representations propose sites either on the edge of the existing urban area, on the edge of key settlements, at smaller settlements or proposed new settlements. Responses highlighted how sites they were promoting accorded with the overall strategy, particularly in respect of sustainability, 20-minute neighbourhoods and enhancing blue and green infrastructure.

A number of responses considered that relying solely on existing committed sites and on large sites with delivery challenges would result in uncertainty regarding housing delivery and therefore there is a requirement for a larger contingency buffer and that new allocations should be considered. This should include a range of large and small sites, including greenfield sites, which can help meet housing needs. Challenges of developing urban sites was also raised.

Responses stated that there is no mechanism for future Green Belt release as part of Part 2 Local Plans in order to allocate new sites. The need for a wider Green Belt review was also raised.

## Other Matters

A developer highlighted that, whilst currently safeguarded land is to be released, no replacement safeguarded land is proposed.

In respect of Broxtowe, a number of developers raised concern that there is an overreliance on sites in the south of the borough which will limit the provision of new affordable homes in the north.

A developer considered that there should be a wider range of employment sites included. Concern was also expressed that the strategy would direct residential development onto existing employment sites. Another response considered that there is no indication of how this significant economic development at Ratcliffe will contribute to long term sustainable development without also planning for residential development alongside it.

The role of new development to support local public services was also highlighted.

A developer raised concerns that none of the council plans within Greater Nottingham make reference to assistance in identifying places of worship or to providing burial spaces for those communities and people who prefer such usage.

### Summarised comments from other organisations

A group of Ashfield Independent Councillors objected to several aspects of the consultation including identifying Hucknall as part of Greater Nottingham which results in additional housing and pressures on the Hucknall infrastructure at the expense of other areas in the Strategic Plan area.

A number of Rushcliffe Borough Councillors supported the preferred approach for sustainable development and the settlement hierarchy. However, they suggested that housing needs, such as for the elderly, could be addressed at key settlements. The importance of safe foot and cycle connectivity was also highlighted. Ruth Edwards MP is broadly supportive of the Plan but raised concerns that previously there had been an unacceptable level of housing being pushed onto Rushcliffe due to Duty to Cooperate and that there should be stronger language in the Planning Strategy to make sure that any shortfall should not be pushed onto neighbouring authorities.

The Nottingham Council of Mosques stated that the growth strategy is supported but housing targets in the City should be in line with government targets and the omission of places of worship needs addressing as places of worship provide valuable support for communities. Burial spaces should also be within easy reach within the City for those who wish to mourn lost relatives.

West Bridgford Hockey Club state that the strategy should also include specific reference in relation to access for residents to sport, leisure and recreation. Nottingham Local Access Forum request that, whilst generally supportive of the strategy, the potential harmful effects of town cramming should be more clearly articulated, and measures should be included to avoid these.

### Summarised comments from local residents

Two residents state that there should be clarity regarding development at other settlements outside of key settlements. Paragraph 4.11 should state that

development at these settlements should be at a smaller scale to meet local needs as defined in currently adopted Part 2 Local Plans. A resident also raised concern regarding excessive housing targets which do not reflect the latest Office for National Statistics projections.

A resident stated that the approach to growth should also support specific housing needs of other settlements and that the strategy should be amended to include a proportionate re-distribution of the housing figures across a greater range of settlements and sites.

A resident stated that the Councils currently do not follow the aims of the 20-minute neighbourhood approach and new developments may be supported if there is greater engagement with communities. The historic approach to identifying and developing sites, and the quality of the developments, is questioned.

A resident stated that Green Belt land should be protected, and brownfield land should be prioritised for development and raised concern regarding building on flood plains. They also stated that more green spaces should be made available. A resident also stated that prime agricultural land needs to be protected.

A number of residents stated that greater action is required to address climate change and air quality and highlighted the importance of wildlife and biodiversity.

A number of residents raised concerns regarding the impact on roads from new development and the need to discourage car use. The importance of providing sufficient infrastructure was also highlighted.

### **Councils' Response**

The importance of the water network is acknowledged, and it is considered that the strategy highlights the importance of this in relation to blue infrastructure. Reference has been included to Natural England's Green Infrastructure Framework within Policy 16.

In respect of supporting the improvement of the transport network, it is considered that Policies 14 and 15 provide the appropriate mechanisms to secure this.

In response to Hucknall being identified as part of Greater Nottingham, it is noted that the Greater Nottingham Planning Partnership was established in 2008 and includes the Hucknall part of Ashfield District, in recognition of the long history of joint working on planning matters. The Nottingham Core Housing Market Area Boundary Study (2018) has given consideration to the role of Hucknall as part of Greater Nottingham.

Policy 2 has been updated to clarify the settlement hierarchy. It is considered that the strategy makes clear that any new development adjoining the built-up area of Hucknall, or in or adjoining Key Settlements, must be of a scale and character that supports these as sustainable locations for growth. It is considered that, subject to these requirements, adjoining the built-up area of Hucknall is a sustainable location for potential future growth. Further information to justify the allocation of

additional land adjoining the built-up area of Hucknall is set out in the Site Selection document in relation to the consideration of the Top Wighay Farm site.

The cumulative traffic and transport impacts have been assessed as part of the transport modelling with further work currently being undertaken.

The need to maximise the value of the historic environment has been included in Policy 11.

Comments relating to the need to ensure that new development is close to employment opportunities are noted.

It is considered that an appropriate mix of sites has been identified, noting that this is a Strategic Plan. Further allocations may be made in future plan preparation which will add to the mix of sites. It is considered that a more dispersed development approach would not be as sustainable as the preferred approach and would require significant further Green Belt release. Due to the majority of sites being existing allocations, it is considered that there would not be exceptional circumstances which would justify a more dispersed approach. Affordable housing would be delivered as part of the identified allocations.

The support for 20-minute neighbourhoods is noted and the Plan makes reference to compact and connected communities. Further clarification regarding how the approach will be applied has been added.

The approach to housing numbers in Nottingham City is clearly stated within Chapter 5.

The Councils commissioned additional work in relation to logistics and have identified sites at Ratcliffe on Soar and Bennerley to meet a significant amount of the wider need which extends beyond the Strategic Plan area.

The settlement hierarchy has been amended to reflect the planning strategy.

Additional sites are not currently required at key settlements in Broxtowe and Rushcliffe to meet the identified housing requirement. Notwithstanding this, future plan preparation can consider if there are specific housing needs which need addressing. In Gedling, future plans will identify housing requirements within and adjoining Key Settlements. Analysis of Key Settlements has been undertaken to ensure that the settlements identified are sustainable and benefit from good accessibility. Future plans will set appropriate thresholds in relation to 'smaller scale' development. This will include considering the role of rural settlements in meeting the housing need.

In relation to allocating additional sites, it is considered that the sites allocated align with the proposed strategy to meet the identified housing need and there is evidence to support their delivery. The allocated sites include a range of greenfield and brownfield sites. Issues relating to housing need and housing numbers are dealt with in Chapter 5. Responses to individual sites are included separately within this document.

It is considered that there is not a need for additional safeguarded land to be identified as part of the Strategic Plan.

The Strategic Plan focuses on strategic employment sites. Future plan preparation will identify a range of smaller employment sites which contribute to the overall mix.

In relation to places of worship, Policy 12 recognises the importance of community level culture. The Strategic Plan makes clear that this includes places of worship. Existing Part 2 Local Plans include identifying burial places. Policy 13 also identifies the importance of sport, leisure and recreation.

The potential harmful impacts of “town cramming” have been considered as part of assessing the level of housing which can be accommodated with Nottingham City.

Policy 1 specifically includes measures to address climate change. The importance of wildlife and biodiversity are identified in Policy 17. The need to protect Green Belt land, prime agricultural land and avoid building on flood plains are noted.

The impact of development on the road network has been considered as part of the transport modelling. Policy 14 sets out requirements relating to modal shift.

### **Changes Made**

Reference has been included to Natural England’s Green Infrastructure Framework within Policy 16.

Further clarification has been provided regarding how the compact and connected communities principles have been applied. The Strategic Plan refers to compact and ‘connected communities’ rather than a strict rule regarding travel times.

The settlement hierarchy has been amended to reflect the planning strategy.

Places of worship are included within the definition of Community Facilities in the justification text of Policy 12.

## Chapter Five: Approach to Housing Need

Comments on Chapter 5 were received from the following:

AA Homes & Housing Ltd, Aldergate Properties, Ashfield DC, Ashfield Independent, Avant Homes, Barratt David Wilson Homes, Barton in Fabis Parish Council, Barwood Land, Bellway Homes, Bloor Homes, CEG Land Promotions (UK) Ltd, Ceylon Tea Growers Association Ltd, Cora, Conlon Construction Ltd, The Crown Estate, Davidsons Developments Limited, David Wilson Homes, Defence Infrastructure Organisation, Derbyshire County Council, Ruth Edwards MP, Erewash Borough Council, Elton Garden Village landowner Consortium, Gladman, Gotham Parish Council, Greasley Parish Council, Hall Construction Services Ltd, Hallam Land Management, Hammond Farms, Harworth Group, Havenwood Construction Ltd, Historic England, Home Builders Federation, Homes England, IM Land, John A Wells Ltd, John Breedon, Keepmoat Homes, Kingston on Soar, Langridge Homes, Lidl GB Ltd, Linby Parish Council, Mansfield District Council, Marrons, Mather Jamie, McCarthy Stone, Metacre, Midlands Land Portfolio Ltd, National Grid Electricity Distribution, Newton Nottingham LLP, Nottingham Council of Mosques, Nottinghamshire County Council, Nottingham Students' Partnership, Nottinghamshire County Council, Oxalis Planning, Papplewick Parish Council, Parker Strategic Land Limited, Persimmon Homes, Radcliffe on Trent Parish Council, Ratcliffe on Soar Parish Council, RBC Leake Ward members, Redrow, Richborough Estates, RBC Gotham Ward member, Rentplus UK, Richborough Estates, Samworth Farms, Savills, Stagfield Group, Strawsons Group, Taylor Wimpey, Tejpartap Singh Sahota, Thrumpton Parish Meeting, Trinity College, Victoria Centre Ltd, Wheatcroft Farm Ltd, William Davis Homes and Woolbro Morris.

In addition to the organisations and representations from those within the development industry, 15 local residents submitted comments on Chapter Five.

### Summarised comments from statutory organisations

Ashfield District Council (ADC) supported councils within the Plan area meeting their own housing need. However, in relation to Gedling BC the allocation extension is not justified. ADC considered that the proposed additional requirement at Top Wighay Farm goes beyond a complementary role for Hucknall in relation to Nottingham.

Derbyshire County Council (DCC) considered it justified and sound not to apply a buffer to the City's housing target, as the target is the available housing supply. Although the housing target for Nottingham City does not fully meet the requirements of the standard methodology, it is considered that exceptional circumstances clearly exist to justify the approach. The City Council has undertaken an urban capacity assessment and accommodating this shortfall would entail development in the Green Belt. DCC would strongly support the principle of the Nottingham-Derby Green Belt being maintained and not being compromised to accommodate any potential unmet need within Nottingham City.

The shortfall in the City is expected to only arise towards the end of the Plan period, which allows the opportunity for housing delivery and supply to be monitored. Further, DCC noted that notwithstanding the inability of Nottingham City to meet

some of the 35% uplift to its housing need, the Plan's housing provision compares with the standard need figure (including 35% uplift) across the four HMA authorities. The level of provision therefore is sufficient to meet the vast majority of the objectively assessed housing need of the area as a whole and will allow for a significant contribution to affordable housing need.

Ruth Edwards MP commented that she was extremely supportive of the plan for no more land adjoining large settlements in Rushcliffe to be earmarked for housing development during the period. She strongly approves of the preferred approach where councils only accommodate their own housing targets.

Erewash Borough Council has no objections to the approach. They support the evidence-based housing need figure for Nottingham City and do not consider that any strategic cross boundary planning issues have emerged as a result of the Preferred Approach document.

Greasley Parish Council are pleased to note the assurance that no new allocations or Green Belt releases are proposed in Broxtowe. They welcome the statement that no other Councils will be called upon to accommodate any of the City of Nottingham's housing needs.

Historic England have made site-specific comments on Ratcliffe on Soar Power Station and an extension to Top Wighay Farm as these are not existing allocations.

Homes England and the Defence Infrastructure Organisation support the delivery of homes adjacent to and within the main built-up area. They also both support the identification of the Barracks which will deliver 1,500 dwellings.

Linby Parish Council commented that the NPPF review has implications upon the delivery of housing.

Mansfield District Council supports the settlement hierarchy, the 20-minute neighbourhood approach, and the proposed approach to delivering the housing and employment needs within the Nottingham Core Area. In relation to Gedling, whilst they do not have any objections to the principle of further growth in Ravenshead; this will be subject to further clarification should proposals come forward as part of the Gedling Part 2 Local Plan.

National Grid Electricity Distribution Plc (NGED) commented that where land allocations affect lines supported by steel lattice towers, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process. In allocating land affected by high voltage power lines, the LPA should take into account the additional costs. NGED does not object to the allocation of land upon which its infrastructure is present, subject to the 4 steps detailed in the full response being taken by the LPA in preparing the Local Plan.

Nottinghamshire County Council (NCC) supports the allocation of those sites already allocated, subject to agreement and inclusion of appropriate infrastructure requirements (particularly transport and education).

Papplewick Parish Council have objected to further housing development that will be dependent on services in Hucknall, which doesn't form part of the core housing

market area and is therefore excluded from this plan. This will also impact on the overall traffic volumes.

Radcliffe on Trent Parish Council commented that Radcliffe has already experienced a large number of new properties without the infrastructure in place, and more housing is planned. It is their opinion that any new developments should be close to areas of employment. They highlighted that migration from urban areas cannot be accommodated by planned growth.

The Parish Councils of Gotham, Barton in Fabis, Kingston on Soar, Parish Meetings of Thrumpton and Ratcliffe on Soar, and the RBC Gotham ward member recognised that the over-allocation in Rushcliffe can be delivered from existing sites and supports this approach. They support the approach for none of the City's shortfall to be redistributed to surrounding Boroughs.

RBC Leake ward members are concerned that Rushcliffe could fail to meet the 5-year housing land supply towards the end of the plan period. Any failure to meet the 5-year housing land supply is likely to result in the return of rampant speculative development at East Leake and other key settlements just outside the Green Belt.

They would like to see considerable strengthening of the commitment to stringent monitoring and early review. They have concerns that the "windfall" figure for Rushcliffe has not taken into account the fact that Rushcliffe's 5-year housing land supply was not met at times during the past 10 years. As the unallocated speculative medium size sites, approved because of "tilted balance" included in the windfall calculations, this gives an over-optimistic figure. They list several avenues to be explored to try to improve accuracy in estimating of housing numbers a site will deliver.

### **Summarised comments from developers**

Those within the development industry and their representatives provided a range of comments on housing need figures.

Marrons on behalf of several developers underlined the requirement to establish housing need on an unconstrained basis prior to and separate from establishing a housing requirement. It noted that in seeking to ensure that housing targets meet forecast economic growth no account has been taken of expected development and job growth created by the Freeport and HS2. Equally, it pointed to the provision of affordable housing as an important and pressing issue in the GNSP area but that this will not, by some margin, be addressed by the housing targets in the emerging Plan.

One response commented that the Plan fails to meet the test of soundness set out in the NPPF as: the proposed adoption of a housing requirement below LHN; there is a lack of evidence to justify the components of supply related to 'windfall development' and 'student accommodation'; there is no explanation of what would trigger a review (they suggest a comprehensive review of the Plan, including a Green Belt assessment); and allocated housing sites should be identified to meet the full level of market and affordable housing needs over the entire Plan period.

Another response commented that at the very least there should be a trigger within the Plan which would allow additional sites to come forward in the Part 2 Plans. This clause would provide additional flexibility for further development within key



settlements if other strategic developments do not come forward or if, as is likely to be the case, more housing sites are required. Alternatively, the GNSP should look to provide safeguarded land on which development can come forward in the future.

### **Nottingham City – 35% uplift**

A significant number of developers were concerned about the City not meeting the 35% uplift and thought that the Standard Method should be the starting point and minimum housing need figure, and that the City's unmet need should be met within Gedling, Broxtowe and/or Rushcliffe i.e. 52,508 dwellings (2,608 + 49,900). A number of other developers and their agents commented that there was a shortfall of 5,445 if the full Standard Methodology figure and a 10% buffer were applied to the whole plan area and the minimum housing target should be set at 57,760 (52,318 + 5,445).

Two responses comment that the question of whether the unmet needs can be met by the neighbouring authorities, within Greater Nottingham, has not even been asked. Instead, as a matter of principle and in objection to the 35% uplift applied to the City, the authorities have put to one side this unmet need. This fails the positively prepared test of soundness.

One developer commented that it isn't clear that the "housing target" has any significance, other than as a step in calculating housing numbers required. The table should show the Plan "need". There has been a historical under-delivery of housing in Nottingham City when compared to the current Standard Method requirement.

Another landowner expressed concerns that the shortfall between the Standard Method and the self-prescribed housing target that Nottingham City have applied will become more pronounced later in the Plan period, resulting in a considerable constraint to the supply of homes. They considered that the alternative approach proposed in the GNSP is not justified as it has not been sufficiently supported by evidence nor does it accord with the aspirations of Paragraph 60 of the NPPF. Furthermore, it does not comply with PPG which requires exceptional circumstances to deviate from the Standard Method.

The Home Builders Federation and others recognised that whilst the Government expects that the city uplift will be met in the urban area it does not prevent these needs from being met elsewhere. The HBF would therefore suggest that the unmet needs arising in Nottingham are addressed elsewhere in the Greater Nottingham area.

### **Buffer**

A significant number of developers considered that buffers should be larger to ensure sufficient sites are allocated to account for non-delivery, or slower delivery rates than anticipated within the strategic allocations (notably Gamston, Toton and Chetwynd).

Several developers noted that by not providing a buffer to Nottingham City this in effect results in an overall buffer of 5-6% across the plan area. Developers considered that this approach does not represent sound plan-making, as the GNSP has not been positively prepared in the context of seeking to significantly boost the

supply of housing. This departure is not justified, nor effective, nor consistent with national policy.

The HBF and others suggested a minimum of 10% across the Greater Nottingham area, as where the housing land supply is highly dependent upon one or relatively few large strategic sites for locations of supply then greater numerical flexibility is necessary than if supply is more diversified.

A response from a landowner commented that the authorities should plan so that the housing needs are met in full. Experience shows that not all sites are delivered and not all sites proceed as expected. As a minimum the flexible allowance should be 10% applied to the whole OAN for the housing market area, although 15% is more appropriate. There are no fundamental constraints to growth in Greater Nottingham. Indeed, growth is required to address needs and help to address the economic disadvantages experienced in the area.

Research undertaken by the Lichfields consultancy (Start to Finish (Feb 2020)) was highlighted by developers, particularly its conclusion that the average build for sites of over 2,000 dwellings was 160 homes a year. The authorities should allocate more sites to provide a greater level of flexibility to the supply of housing. This should also include more homes specifically for the elderly.

One response considered that the buffer should be added to the “target provision” and to the 5-year land calculations and should be 20%. Several developers commented that in the case of Rushcliffe, there is a reliance on a small number of very large sites to meet housing need requirements in the MBUA. Reflecting this they suggest a higher buffer, closer to 20%. To allow for this, further allocations (including small and medium scale sites adjacent to and well related to the MBUA), that can come forwards quickly, should be included in the Plan.

A planning consultant commented that the delivery rates demonstrate that the authorities have over-estimated delivery on sites and failed to recognise that some sites would, for whatever reason, stall. The housing need provision must therefore build in significant levels of flexibility to ensure delivery – planning for significantly more, including a range of sites and planning early and comprehensively for strategic sites.

### **Affordable Housing**

A significant number of developers highlighted that in order to deliver the affordable housing requirements identified in the housing need assessment (2,107 dpa) more sites need to be allocated. The affordable housing need would represent 68% of the housing target being planned for in the Draft Plan (3,119 dpa). If the need for affordable home ownership is also included this should increase. Affordable need accounts for 79% of Broxtowe’s housing target, 79% of Gedling’s, 69% of Nottingham City’s and 47% of Rushcliffe’s. If the affordable housing policy is similar to that of the adopted Core Strategy development will be able to viably deliver 10-30% affordable housing depending on its location. This is significantly below what is needed, and a higher affordable housing requirement would render the plan undeliverable.

The development industry does not advocate that affordable need necessarily be met in full. However, the need should be considered in the context of PPG which

states “An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes”.

### **Economic Growth**

Several developers commented that increased job creation resulting from the Freeport and HS2 will increase housing demand. A number of responses commented that the evidence base of the Draft Plan states how the housing targets will meet forecast economic growth based on the ‘regeneration’ scenario in the Employment Land Study (May 2021). However, this scenario does not take account of and is unlikely to support expected development and subsequent job growth created by the Freeport and HS2.

Marrons on behalf of several developers commented that the Freeport and HS2 developments have the potential to increase job growth in the Nottingham HMA from the 58,608 jobs to 77,300 jobs. This equates to 3,401 jobs per annum; a significant increase on the 2,619 jobs per annum that the draft GNSP is based on supporting.

Another response commented that the level of net commuting in Greater Nottingham had an estimated ratio of 1.28 in 2021 suggesting a notable level of net in-commuting, which has increased since 2011. Consideration should be given to whether the current level of net in-commuting is sustainable and whether future economic growth would exacerbate this. As a net importer of labour, one developer believed an objective assessment of economic growth aspirations should be tested to understand whether there are exceptional reasons for an uplift in housing to be applied.

### **Broxtowe Borough’s Housing**

One developer noted that a large proportion of supply relies on two strategic sites to deliver – this is considered unsound, particularly given that the sites are complex and there has already been significant delay in their delivery.

Another response has also highlighted the reliance on the Toton site and its dependence on forthcoming Government decisions on the provision of transport infrastructure, including potential new rail. They highlighted that the Government announced in November 2021 that the HS2 station at Toton would be scrapped and therefore the question arises as a result of this shift, should the land at Toton be allocated for the full 1,400 homes originally proposed.

One landowner at Toton supported the reference to minimum levels of housing in the approach, including both the total and the distribution to Broxtowe. They also supported the identification of the strategic location for growth of between 1,400 and 1,700 homes.

### **Gedling Borough’s Housing**

Two responses from developers commented that Gedling should ensure that as a minimum the proportion of new housing to be built in the Borough over the Plan period should equate to 75% (the current proportion of the Borough's population which lies in the MBUA) not 50% (the emerging GNSP). By removing the extension to Top Wighay (640 dwellings) and by making adjustments to existing small site allocations based on actual completions (a difference of 777), then the total housing supply in Gedling Borough is only 5,903.

To address the gap between housing supply and housing provision will require at least one new strategic site allocation on the edge of Arnold/Carlton. It is their firm opinion therefore that the GNSP, particularly in the case of Gedling, needs to identify future strategic allocation sites now, so that they can be brought forward in a timely manner, and thus avoid housing land shortages during the second half of the plan period. They do not consider that the designation of safeguarded land is an appropriate mechanism for dealing with the flexibility buffer. Safeguarded land should be identified in addition to reserve allocation sites.

One response commented that their clients maintain that the GNSP in its current form would not provide sufficient flexibility in land supply to meet the needs of the Borough.

Two developers commented that it is not considered appropriate to delay the allocation of further sites to meet the shortfall to the Local Plan Part 2. To do so would result in uncertainty for developers and local communities alike and would stymie housing delivery and the sustainable growth of the Key Settlements.

Another alongside the HBF commented that the Plan does not seek for the Housing Market Area to accommodate Gedling's shortfall but states that further sites will be allocated in future part 2 local plan. However, the constraint of Green Belt will not be removed in the next plan, therefore it is likely that Gedling will continue to struggle in meeting its minimum housing need. They therefore consider that the plan should be seeking for adjacent authorities, without significant Green Belt constraints to meet the housing shortfall from Gedling.

### **Nottingham City's Housing**

The HBF and others commented that it is notable that delivery in Nottingham relies heavily on windfall development (32%). Whilst the latest permitted development rights and the changing nature of town centres will offer opportunities for new residential development this is by no means certain. It is also the case that Nottingham's windfall assessments are based on only five years of past data. Whilst the HBF appreciate that this is the only data available there is a considerable risk that this level of delivery will not arise across the whole plan period.

One representation stated that concerns about the certainty of these sources of supply are compounded by the lack of buffer applied to the provision figure for the city. Instead, a non-implementation allowance of -186 dwellings is applied to the supply. This is not a sufficient replacement for an appropriate buffer of 10%, particularly in the context of the deliverability concerns in the city.

Another developer commented on the City's windfall allowance, stating that calculating a windfall rate based on historic delivery rates of office conversions is not suitable in this case, given that there will be fewer offices to convert. Accordingly, the windfall rate should be reduced, which will further increase Nottingham's unmet housing need deficit.

A response commented that Nottingham City only projects to deliver (at least) its annual housing requirement in only eight years out of the 16-year plan period. This does not suggest that it is only the 'end' of the plan period which will be affected by the non-provision of the full standard method figure for Nottingham City.

Several developers noted that a number of sources of supply being exhausted (open spaces) or reducing (suitable sites for office conversions).

One city centre landowner commented that in order to make the Plan sound, the GNSP should increase its housing target in line with the housing need identified in the 'Preferred Approach Assessment of Housing Need and Capacity in Nottingham City' paper.

### **Rushcliffe Borough's Housing**

A site promoter commented that, in accordance with the PPG, Rushcliffe should take account of situations when it is appropriate to plan for a higher housing need figure than the standard method indicates. Ratcliffe on Soar Power Station and Toton are key areas identified for economic growth. It is considered important this is considered and the housing requirement for Rushcliffe adjusted up to reflect this significant change.

Two other landowners commented that it was established in the joint evidence base for the Aligned Core Strategies and the Rushcliffe Part 1 Local Plan that Rushcliffe was the most sustainable location to accommodate large scale growth as supported by the evidence base. Whilst the evidence base has been superseded by studies to support the Preferred Approach, the conclusions are largely the same and a higher housing provision (above the standard method) should be adopted within Rushcliffe.

A response from a developer commented that the City's shortfall (2,608 dwellings) should be redistributed to in or adjoining the Nottingham Main Built Up Area (MBUA) within Rushcliffe. Meeting the requirement of 28,368 dwellings or ensuring the residual requirement dwellings is provided and delivered elsewhere in or on the edge of the Nottingham MBUA would assist in the delivery of family housing.

One planning consultant highlighted that within Rushcliffe, outside of its strategic allocations, development will be concentrated at the Key Settlements, however the plan provides no mechanism for such sites to come forward. This provides for no flexibility in housing supply, nor does it enable Rushcliffe to accommodate any of Nottingham City's shortfall. They therefore suggest that restrictions on development within Key Settlements are removed.

Another response commented that there are key settlements beyond the Green Belt which could take more housing growth, such as East Leake, which have public transport links and are locations that people want to live. Directing more growth to key settlements will ensure that housing needs are met whilst according with national policy and the proposed development strategy. In addition to a number of others, this

developer objects to no further allocations being proposed within Rushcliffe. Given the constraints on supply identified in Nottingham City and Gedling and the lack of Green Belt constraints around some of Rushcliffe's key settlements, such as East Leake, they consider that in order to be positively prepared, Rushcliffe should be seeking to accommodate unmet need from these authorities.

### **Other issues raised by Developers**

One developer's response commented that the Strategy needs to meet the needs of Greater Nottingham's diverse communities and cater especially for areas of social need, to put at the forefront a quality of design that aids public safety and refers to an equalities framework that boosts the plan wide performance. With so much social deprivation and overcrowded housing to be addressed, appropriate intensification can address the proposed shortfall in the target e.g. north of Bulwell.

A response commented that it is not considered appropriate to exclude the Hucknall area of Ashfield from the Plan Area on the grounds of "administrative convenience", but it is acknowledged that inclusion in the Plan cannot be forced upon ADC. If Ashfield underprovides for the Hucknall area of the HMA then by default that need will be met by adjacent Councils will face increased demand from the Hucknall area on their site provision, adding pressure to their ability to meet their own needs and to increased housing prices etc.

Another response commented that 24% of housing to be delivered across the Plan period will derive from windfall development. The authorities should look to provide certainty in the plan-making process by instead allocating land for development to deliver a proportion of that currently identified as windfall. 'Plan B' or 'reserve' sites should be allocated to provide an additional buffer of housing land. Such land could be released under specific circumstances such as those tied to the delivery of strategic sites, a deficit of housing land supply, or an increase in the housing requirement. This would create inherent flexibility in the GNSP avoiding the lengthy delays associated with a Local Plan Review or more comprehensive update.

A response from a specialist housing provider commented that the need to provide housing for older people is critical, particularly for the local authority areas outside of Nottingham City itself. The Local Plan should recognise that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing.

The HBF commented that the delivery of 10% of homes on sites of less than one hectare, as required by the NPPF they would advocate a higher percentage of small sites are allocated if possible.

### **Summarised comments from other organisations**

A group of Ashfield Independent Councillors highlight that the Hucknall part of the District of Ashfield is regarded as part of Greater Nottingham but the District as a whole is in the Nottingham Outer HMA. This is a cause of great frustration as additional housing pressures are being placed on Hucknall's infrastructure. 1,650 dwellings around Hucknall will have a huge impact on Hucknall already struggling from poor

infrastructure. They have already objected to proposals that relate to Top Wighay Farm.

The Nottingham Council of Mosques commented that the decision not to follow government housing targets in the City, unlike in the rest of the planning area is to be regretted with so much social deprivation and overcrowded housing to be addressed. Appropriate intensification can address the proposed shortfall in the target e.g. north of Bulwell.

Rentplus UK urges the contributing Local Authorities to review their own policies more in line with NPPF and the need to address the affordability issues facing aspiration homeowners in this geographical area by embracing flexible tenure policies including Rent to Buy. More detail on affordable housing delivery mechanisms is preferred.

Nottingham Students' Partnership commented that students are increasingly seeing growth in the existing communities in Broxtowe, Rushcliffe and Gedling. There is a specific and growing student housing need in the Greater Nottingham area which should be considered; the continued onus on Nottingham City to provide all vacancies denies the reality of current student behaviour in relation to their community choice.

### **Summarised comments from local residents**

One resident was concerned that the high levels of immigration mean that no amount of house building will provide enough homes.

A significant proportion of comments from residents highlighted that the success of any housing developments will depend on the construction of communities and delivery of infrastructure. Priority should be given to health, education, green infrastructure, leisure facilities, transport and roads. Two local residents stressed the importance of ensuring that networks of cycle paths are integrated into new housing sites. In relation to this, a resident specifically mentioned the Toton/Chetwynd development. Specific comments highlighted the planned developments at Radcliffe on Trent and Bingham as examples of the scale of development and their impacts on small village/town centres.

A resident questioned why site H8 Killisick Lane is identified in the Housing Background Paper Supply for Gedling Borough Council (December 2022) as a source of supply if the council has declared the site will not be sold for development.

A resident objected to the Government's 35% uplift in housing applied to Nottingham, the Government's definition of brownfield sites and infill. They also object to the development of land off Regatta Way and Gamston/Tollerton.

A resident commented that lots of new houses is generally good, but they notice almost all the industry investment is in the south of the county, and the document states "promotion of Nottingham as the primary location for new offices".

A number of residents commented that it is vital that the green belt is maintained. Maintaining the green belt is important for health and well-being, walking along public footpaths maintains physical and mental health. Village life should be maintained, large developments on the doorstep of villages threaten the village

identity and the green belt must be maintained to prevent neighbourhoods merging into one another.

A resident is concerned about the amount of houses that are being built on green spaces and countryside in Gedling and the surrounding areas, Concerned about the impact on wildlife and flooding. Especially concerned about development on land behind Green's Farm and Grange View Road.

One resident is concerned that the housing targets in the GNSP are excessively high and should be reduced to reflect projections produced by the Office for National Statistics (ONS). The ONS are predicting the East Midlands to have the second highest growth rate in the UK over the planning period. As such there should be no need to further inflate ONS housing projections as has been done in earlier GNSPs. They consider the housing provision for the City should be reduced to 14,511 and Rushcliffe's reduced to 7,367.

## **Councils' Response**

### **Nottingham City – 35% uplift**

A range of options for the level of housing growth were tested through the Greater Nottingham Strategic Plan Sustainability Appraisal (2024). The proposed housing targets for Broxtowe, Gedling and Rushcliffe are above the current Standard Method and for Nottingham City match the supply figure. This is considered to be an ambitious approach that meets the area's growth aspirations, and also significantly boosts the supply of homes. There is further information within the Housing Background Paper.

### **Buffer**

It is not a requirement to have a buffer to the housing supply, and the Councils have moved away from this approach within the Publication Draft of the plan. Instead, the supply of housing within the 4 authorities allows for non-implementation of some housing, in line with the agreed methodology of the SHLAAs. It is therefore not considered necessary to identify any 'Plan B' or reserve sites.

### **Affordable Housing**

Several developers pointed to the provision of affordable housing as an important and pressing issue in the GNSP area but that this would not be addressed by the housing targets in the emerging Plan. In response, the Councils consider that the Plan will allow for a significant contribution to meeting affordable housing need. Councils have a duty to meet the needs of those on the housing register, which contains priority bands reflecting different levels of housing need. Accommodating the need of those in the highest priority band is an important element of the councils' allocations policy.

### **Economic Growth**

Several developers noted that in seeking to ensure that housing targets meet forecasted economic growth no account has been taken of expected development and job growth created by the Freeport. In response, the Councils have adopted the 'Regeneration Scenario' for economic growth, which is the highest growth



scenario of the options in the Employment Land Study, and therefore includes an optimistic economic growth rate above past trends. Since consultation on the Preferred Approach, the Government has decided not to progress with HS2 north of Birmingham, including to East Midlands Parkway. Notwithstanding this decision it should be noted that HS2 would not have been operational until after the end of the plan period and consequently the growth associated with HS2 would have happened after services began. As stated above, the regeneration scenario allows for above trend economic growth, which would accommodate any economic growth that may have occurred in advance of HS2 being operational. Should monitoring indicate that economic growth is higher than anticipated by the regeneration scenario, this can be addressed through a review of the Plan.

### **Broxtowe Borough's Housing**

Greasley Parish Council's comments are noted.

Despite the HS2 station at Toton not going ahead, the proposed development site will continue to be allocated, it is an existing allocation, it is still considered to be a sustainable location for growth.

It is noted that a landowner at Toton supported the reference to minimum levels of housing in the approach, including both the total and the distribution to Broxtowe. They also supported the identification of the strategic location for growth of between 1,400 and 1,700 homes.

### **Gedling Borough's Housing**

In Gedling it is viewed appropriate to consider whether to identify additional non-strategic safeguarded land in future plan preparation.

Ashfield District Council considered that the proposed additional requirement at Top Wighay Farm goes beyond a complementary role for Hucknall in relation to Nottingham. It is considered that the strategy makes clear that any new development adjoining the built-up area of Hucknall, or in or adjoining Key Settlements, must be of a scale and character that supports these as sustainable locations for growth. It is considered that, subject to these requirements, adjoining the built-up area of Hucknall is a sustainable location for potential future growth. In response to Hucknall being identified as part of Greater Nottingham, it is noted that the Greater Nottingham Planning Partnership was established in 2008 and includes the Hucknall part of Ashfield District, in recognition of the long history of joint working on planning matters. The Nottingham Core Housing Market Area Boundary Study (2018) has considered the role of Hucknall as part of Greater Nottingham. Further information to justify the allocation of additional land adjoining the built-up area of Hucknall is set out in the Site Selection document in relation to the consideration of the Top Wighay Farm site.

Papplewick Parish Council state that they have objected to further housing development that will be dependent on services in Hucknall, which doesn't form part of the core housing market area and is therefore excluded from this Plan. This will also impact on the overall traffic volumes. In response, the Greater Nottingham

Strategic Plan is informed by an Infrastructure Delivery Plan which sets out the infrastructure needed to support new development. GBC have published a Planning Obligations Protocol (June 2014) which supports the use of contributions to fund necessary infrastructure where development in Gedling Borough impacts on an adjoining Council's services. Transport modelling of the proposed strategic allocations has been undertaken and will be published alongside the Plan.

In response to a resident's issue regarding H8 Killisick Lane, Gedling Borough previously consulted with residents in August 2022 and made the decision, at the time, not to proceed with the sale of council owned land near Killisick Lane. Since then, the Council has reviewed this decision and agreed at Cabinet in October 2023 to dispose of the site. As such it is considered appropriate to continue to include the site (which was allocated for housing in the Council's Part 2 Local Plan) in the supply figure.

It is noted that a resident is concerned about the number of houses that are being built on green spaces and countryside in Gedling and the impacts on wildlife and flooding. They were especially concerned about development on land behind Green's Farm Lane and Grange View Road. In response, the land behind Green's Farm Lane and Grange View Road is allocated in the Part 2 Local Plan and known as Willow Farm and the general principle of developing housing on the site has therefore already been established. Conditional planning permission has been granted for development on part of the site at Grange View Road (application 2021/1398). A planning application for the remainder of the site has not yet been received and the application process would consider relevant issues raised.

In terms of the general approach to new housing, as much development as possible is being accommodated on sites within the urban area, including brownfield sites. However, to meet our housing need, sites on the edge of the urban area are needed to be allocated necessitating their removal from the Green Belt. This approach was endorsed by the independent planning inspector of the Core Strategies.

### **Rushcliffe Borough's Housing**

Ruth Edwards (MP at the time of the consultation) supportive comments, that no more land adjoining large settlements in Rushcliffe is earmarked for housing development during the period and that councils only accommodate their own housing targets, is noted.

One planning consultant highlighted that within Rushcliffe, outside of its strategic allocations, development will be concentrated at the Key Settlements, however the Plan provides no mechanism for such sites to come forward. In response, Para 5.34 of the preferred options document – Rushcliffe is already providing significantly above its housing requirement. There's no need for further housing delivery on top of the large number of sites already allocated and which are delivering or will be delivering shortly. These sites, plus the major urban extensions allocations, already provide flexibility.

### **Other issues**

The support of Nottinghamshire County Council, Derbyshire County Council, Erewash Borough Council, Ashfield District Council and Mansfield District Council, to the approach to housing need is noted.

It is noted that several Parish Councils also support the approach for none of the City's shortfall to be redistributed to surrounding Boroughs.

Several responses were concerned that sufficient infrastructure provision should be provided alongside housing developments. In response, an Infrastructure Delivery Plan has been produced alongside the plan, and each allocation in the plan will include infrastructure requirements

In response to requests to extend the Plan period, the Plan period has been extended from 2038 to 2041 to enable the Plan to look forward 15 years from the predicted date of adoption. Despite the extension of the Plan period, no further new allocations have been made over and above the sites in the previous Preferred Approach.

In response to requests for an early review of the Plan, there will be a statutory five-year review of the Plan.

It is noted that a number of residents commented that it is vital that the Green Belt is maintained. Maintaining the Green Belt is important for health and well-being, walking along public footpaths maintains physical and mental health. Village life should be maintained, large developments on the doorstep of villages threaten the village identity and the Green Belt must be maintained to prevent neighbourhoods merging into one another.

It is noted that one resident is concerned that the housing targets in the GNSP are excessively high and should be reduced to reflect projections produced by the Office for National Statistics (ONS).

One response commented that the Plan fails to meet the test of soundness set out in the NPPF as: the proposed adoption of a housing requirement below LHN; there is a lack of evidence to justify the components of supply related to 'windfall development' and 'student accommodation'. In response, the Government are encouraging residential development in urban areas and have set a 35% uplift for Nottingham.

Given the state of flux in the office market due to increased homeworking there is likely to continue to be a supply of offices for conversion and redevelopment. Although several pieces of open spaces have been redeveloped for residential, they were allocations and were never considered to be windfall sites and are not considered in the previous years of windfall trends.

Due to an interruption in data collection, the City Council's windfall figures for 2021/22 were based on a five-year period commencing in 2017/18. The intention is to extend this period to ten years, as data becomes available. As there is now an extra year of windfall data (2022/23), the windfall rates in the City are now based on 6 years of past trends and may be based on a longer trend before adoption of the Strategic Plan.

The City Council has worked alongside the University of Nottingham and Nottingham Trent University to develop a Student Living Strategy. The Strategy focusses on ensuring that student accommodation need can be met in the City as a result of the significant increase in student numbers that the City has experienced and will continue to experience. The Strategy plans for a 2.8% per annum increase in student numbers until at least 2030. Part of the Strategy is also aimed at addressing the undersupply of student accommodation that has happened as a result of student accommodation units not matching the significant increase seen in student numbers over the last decade. The City Council rigorously monitors student development that has occurred and is in the pipeline. The Council also carries out an annual occupancy survey of student accommodation to keep an overview of accommodation in the City to ensure that its planning policies in relation to student housing are effective. To date vacancy levels in student accommodation have been low. The City Council contends that it has a robust evidence base relating to student accommodation.

### **Changes Made**

The Plan period has been extended from 2038 to 2041 to enable the Plan to look forward 15 years from the predicted date of adoption. Despite the extension of the Plan period, no further new allocations have been made over and above the sites in the Preferred Approach.

The windfall calculations for the City are now based on 6 years of figures rather than 5, as there is an extra year of data available ie 2022/23.

## Chapter Six: Approach to Employment Need

Comments on Chapter Six: Employment Need were received from the following:

AA Homes and Housing Ltd., Ashfield District Council, Barton in Fabis Parish Council, Barton Wilmore, Boyer Planning, CEG, Councillor Rex Walker, Davidsons Developments, Defence Infrastructure Organisation, Global Mutual, Gotham Parish Council, Harworth Group, Havenwood Construction, Homes England, Kingston on Soar Parish Council, LIDL, Mansfield District Council, Marrons Planning, Mather Jamie, Metacre, Mulberry Land, Nexus Planning, Nottingham Council of Mosques, Nottingham Students Partnership, Nottinghamshire County Council, Ratcliffe on Soar Parish Meeting, RBC Leake Ward members, Omnivale Ltd., Oxalis Planning, Q+A Planning, Taylor Wimpey, Thrumpton Parish Meeting, Savills, Wilson Bowden, West Bridgford Hockey Club, WSP.

In addition to the above stakeholders one local resident submitted representations on Chapter Six.

### Summarised comments from statutory organisations

The five Parish Councils in Rushcliffe and the RBC ward member for Gotham stated that they supported the strengthening and diversification of the economy but considered this objective was not supported by the spatial allocation of employment space. They raised concern that the allocation of 81ha of employment land at Ratcliffe on Soar (which they thought did not appear to have been included in the provision) will act as a draw away from the objectives. Whilst supporting aspirations for development of zero carbon technology at the site, the respondents commented that there needs to be safeguards ensuring that the land doesn't fall into general industrial use and undermine the employment objectives of this plan. They added that demonstrating sufficient very special circumstances capable of justifying development in the green belt involves using the site in a way that significantly contributes to addressing the climate emergency. They also stated that the site does not meet the criteria in the Iceni Study for its consideration as a strategic distribution site.

Ashfield District Council considered it is important that the findings of the Logistic Studies are fully considered as part of the emerging Greater Nottingham Strategy as otherwise this places increased pressure on employment sites in Ashfield District for logistics. Ashfield District Council also noted that no additional employment land requirements are proposed at the Top Wighay Farm location.

Mansfield District Council stated they had no objection to the strategy for employment as set out in the consultation document.

Rushcliffe Borough Council Leake ward members stated it is disappointing that this consultation covers allocation of employment land, but not at this stage land for logistics, which could be added at a later stage, rather than being included in the list of site assessments at Appendix A. In order to understand the cumulative impacts of development, logistics sites should be included at this stage. The impact of all employment developments, including logistics, on nearby settlements and housing allocations needs to be understood before allocations can be made, and any assessment of the impact on highways should take account of logistics at the same time as employment and housing. They also recommended a correction to the

references to "Universities and Higher Education" in 3.2.4 and 6.5.5 so that they encompass Further Education as well as Higher Education establishments.

Nottinghamshire County Council supports the allocation of Toton, Ratcliffe on Soar Power Station site and existing strategic development sites (e.g. Top Wighay) subject to ensuring appropriate infrastructure requirements. In relation to Ratcliffe on Soar power station they referred to minerals and waste safeguarding issues and in this context the need to align the strategic allocation policy with the emerging Local Development Order (LDO). They also referred to the opportunity for a local heat network at this site which can provide low carbon heat for the entire allocation and request that a local heat network is made a specific requirement or consideration as part of the utilities needed for the strategic allocation.

Homes England and the Defence Infrastructure Organisation referred to inconsistencies in the document about Chetwynd Barracks where the site is referred to as a location where only smaller scale employment land provision will be delivered (as described on page 39 which they agree is correct) as opposed to paragraph 6.14 which describes both the Toton site and the Barracks, under the sub-heading 'strategic locations for business' implying a more major scale of employment development at the Barracks which the consultee do not agree with. Homes England and DIO also repeat their request that the next version of the Plan makes clear that it is Homes England, acting in its role as lead developer in a partnership with DIO that will be responsible for the delivery of development at the Chetwynd Barracks, and not East Midlands Development Corporation.

### **Summarised comments from developers**

#### **Quantity of employment land and labour supply and demand**

A number of developers considered that the emerging Strategic Plan's strategy for meeting objectively assessed needs for employment is unsound and that the Preferred Approach does not make sufficient allowance to plan for all types of objectively assessed needs for employment land. One developer considered the general employment land figures set out in paragraph 6.4 to be inaccurate and require review and also raised an issue of "double counting" in relation to general employment land supply and the potential supply of strategic distribution sites. Developers considered the vision and spatial strategy to be too narrowly focussed and does not set out a clear long term spatial strategy which is inconsistent with the NPPF, failing to capitalise on growth opportunities.

Two responses commented that the Preferred Approach does not take account of the prospect of existing and proposed employment uses being lost to other uses, such as residential.

A number of responses noted that the evidence base states how the housing targets will meet forecast economic growth based on the 'regeneration scenario' set out in the May 2021 Employment Land Study. Marrons demographic forecasting indicates the housing targets will broadly support the job growth in the regeneration scenario. However, an element of the housing target is intended to address affordability issues rather than population growth. Removing the affordability uplift from the housing targets would result in average job growth only marginally higher than the regeneration scenario. This means that the housing targets are unlikely to support

any economic growth which exceeds the assumptions of the regeneration scenario. Based on their assessment of East Midlands Freeport and HS2 these developments have the potential to increase job growth in the Nottingham Housing Market Area from the regeneration scenario of 58,608 jobs between 2018 - 2038 to 77,300 jobs between 2018 and 2038. Allowing for a reduction for Erewash a Greater Nottingham job growth figure equating to 3,401 jobs per annum a significant increase on the 2,619 jobs per annum on which the draft plan is based. There is therefore clear economic justification to make provision for additional homes higher than the standard method in order to address the expected jobs growth over the plan period.

### **Distribution of employment**

Four developers objected to the distribution of employment land, referring to constraints in Nottingham City which has displayed a negative net delivery rate across all employment floorspace in comparison to the HMA authorities which make a modest positive net rate. The various constraints within the City means additional land requirements would have to be fulfilled elsewhere within the surrounding authorities. They referenced ONS data on job density arguing there is a strong rationale on the basis of the data, to provide for new economic development and job generating opportunities within Broxtowe and Rushcliffe.

Three respondents commented that whilst the Preferred Approach identified an overall surplus of employment land in the HMA as a whole there were significant shortfalls in the surrounding Boroughs especially in Broxtowe. One developer considered Broxtowe has a significant need of 31 ha against a supply of 6 ha leaving a minus 25 ha shortfall and in their view this would not provide for the range and choice of sites up to 2038. They considered their view reflects the evidence presented in the 2012 Lichfield study which highlighted a need for 200,000 to 500,000 sq. feet during the Plan period. They urged that a more even distribution of employment land is required and an increase for Broxtowe.

### **Ratcliffe on Soar and Toton strategic allocations**

A number of developers and landowners considered there was over reliance or over concentration on the Ratcliffe on Soar strategic employment allocation with some developers urging the authorities to reconsider the allocation of such a large amount of land at Ratcliffe on Soar Power Station. They considered that focusing on one large allocation risks constricting the supply of employment land, and by consequence economic growth, particularly in the event that decommissioning of the power station is delayed further or if development does not materialise. One considered that the Preferred Approach's trajectory of 2025 for redevelopment of the site is highly unlikely to be achievable, with estimations that this site will not come forward until significantly later in the plan period, if at all. Due to this uncertainty the consultee considered that there is an additional requirement for at least 121 ha of employment land to be found and allocated across the HMA that is deliverable early on in the plan period. Another consultee considered the Ratcliffe on Soar Power Station site to constitute a special case with complex and timely remediation required which will take a long time to come forward and that this site should be considered independently of (and in addition to) the Plan's wider employment need and supply balance. It was noted by one respondent that new economic development will be promoted at Broxtowe and Ratcliffe on Soar, on employment allocations within

existing strategic sites and called for additional strategic residential sites that would also meet employment needs.

In addition, one landowner also thought similar issues relating to delivery are likely to apply to the sites at Toton and Chetwynd Barracks.

### **Strategic Distribution**

Numerous developers stated that the omission of a strategy to meet the needs of the strategic distribution sector renders the Preferred Approach unsound. Developers referred to the Iceni Study and the views of property agents as providing robust evidence that there is a clear and demonstrable need for B8 logistics and distribution sites of a strategic scale across the HMA. One consultee commented that the urgency of the issue is highlighted by Iceni who note the extremely low vacancy rates in Greater Nottingham and note this shows complete undersupply/failure of the market. One respondent was unclear whether the Councils are likely to identify additional preferred sites to cater for strategic distribution.

Another response referred to losses of industrial warehousing land over the previous 10 years as set out in the Lichfields Study and that these had not been taken into account and referred to there being an identified additional need for 34 – 48 ha. This was considered to be especially important as the Iceni Study on p.10 states that “From 2019 –2039, employment in the logistics sector is forecast to experience growth of 19%”.

Developers argued that the M1 corridor is a key location for new strategic logistics development including various sites around Junction 26. Some developers noted that the M1 corridor is heavily restricted by the Green Belt which needed to be reviewed as there were exceptional circumstances to release Green Belt land in suitable locations for strategic distribution sites along this corridor including at Junction 26. Other locations considered highly suitable included sites especially in Broxtowe and Rushcliffe along A roads including the A453, A52, A46, A606, A60 and arguments were also put forward about the need to review Green Belt for relevant sites and for the release of such land from Green Belt as the exceptional circumstances required could be justified for strategic distribution needs.

### **Strategic Employment Allocations**

One developer supported the allocation of the Toton Strategic Location for growth including for employment but raised concerns about the lack of detail in terms of master planning for the site. Another’s consultant supported the allocation at RAF Newton although they argued the case for more land to be allocated at this location.

### **Alternative sites**

Developers promoted various sites on the grounds that these would be consistent with the economic aspirations and objectives set out in the Vision for the Plan, balance housing allocations and meet the needs for general employment and / or strategic distribution demand. One argued for additional sites to meet housing needs to be identified and that consideration is given to additional strategic residential sites which can equally meet the above employment needs and not left



for part 2 Local Plans. These site-specific representations are set out in the Appendix.

### **Employment land protection, retail uses and town centres**

A national retailer requested that paragraph 6.8 should be amended to recognise that retail uses should be considered as an alternative and complementary use on employment sites (as per paragraph 120 of the NPPF). Paragraph 6.21 relating to the management of employment sites, should be amended so the uses that would be considered acceptable are explicitly referenced. Noting there is a surplus of employment land, they considered the approach to the protection of employment land contradicts paragraph 123 of the NPPF. They recommended amendments to paragraphs 6.8 and 6.21 to ensure that where proposals come forward for alternative uses on existing employment land, a balanced consideration is given to the economic merits of the scheme, the degree of alignment with the 20-minute neighbourhood concept and the availability of surplus employment land, and a decision is made on planning balance (when weighed against the benefits of protecting under-utilised previously developed land).

A city centre landowner noted that the Preferred Approach places strong emphasis on the need to promote office development as well as having sites up to 2038 for new and relocating industrial and warehouse uses. Therefore, the Greater Nottingham Strategic Plan should support town centre uses and be clear in its indication of where main town centre uses will be focused. New retail uses should be concentrated within the designated boundaries of city, town, district and local centres. It is paramount that the application of the sequential approach and impact test to assess out of centre proposals is applied.

One respondent noted the lack of reference to identifying places of worship or burial space which risks inadvertent discrimination against various communities (12.2 % of the City's population comes from Islamic communities according to the recent census). The promotion of 52,500 jobs creation is welcomed. However, there should be reservations about some jobs coming from the drinks sector in light of alcohol related illnesses, dependencies and conditions.

### **Summarised comments from other organisations**

West Bridgford Hockey Club referred to the focus being on employment provision for office and industrial/warehousing uses whereas employment should be considered in a wider sense that just focussing on the needs of traditional industrial, office and warehousing. Other uses, including sport and leisure can also be large employment providers and as the stated vision is for the area to be *“the pre-eminent sporting centre in the region (Paragraph 2.12)”*, they would expect to see reference to this under the Preferred Approach to Employment Need.

Nottingham Students Partnership considered that it is not possible to consider the economic impact of the Universities nor plan for their expansion without factoring in the important contribution that students themselves make to that; through the tuition fee income which is the largest bulk of university funding, through the money students themselves spend in the city, and that they earn as employees (often in difficult to fill part-time positions). They highlighted the importance of current students to the local economy, in addition to the universities' staff and graduates. They referred to the key importance of retaining graduates as part of the local

community and considered it surprising that this hasn't been considered in this Strategic Plan. They also referred to the need to specifically address the housing needs of students.

Nottingham Council of Mosques agrees that the approach for extra jobs and upskilling is to be encouraged, particularly in the context of addressing social deprivation needs in the City. The support for the drinks sector in 5.9 should be deleted so as to protect the interests and health of Greater Nottingham residents as well as their taxes when it is remembered that in the year before COVID struck a shocking 25,000 residents were admitted to City and County hospitals for alcohol related illnesses, dependencies and conditions.

### **Summarised comments from local residents**

A local resident referred to industry investment being in the south of the county including at Nottingham City Centre as the primary location for new offices. The respondent raised concerns that this would encourage car-based trips and traffic from the north to the centre and from the south with additional traffic. In this context, Kimberley and Watnall are not well served by integrated public transport. It would ease congestion to have offices at edge of town locations. Also refers to the lack of integrated ticketing systems between different bus operators.

#### **Councils' Response**

##### **Quantity of employment land and labour supply and demand**

Developers considered that the employment provisions were insufficient and do not make sufficient allowance for all types of objectively assessed needs for employment land. In response to this point, the employment provisions set out in the Preferred Approach are based on the Lichfields Employment Land Study 2021 (ELS) which has been prepared in accordance with national planning policy and guidance. The Councils have opted to base the employment land provisions on the regeneration scenario in the ELS which gives the highest estimate of jobs to plan for.

ELS also recommended a separate study be carried out to assess the need for large scale strategic distribution facilities which has been prepared and provides an indication of demand for large scale distribution which would be additional to the general needs set out in the ELS 2021. The Councils have carried out a Preferred Approach consultation on strategic distribution sites in order to make specific allocations for this particular sector (see section on strategic distribution sites below).

The ELS makes recommendations about the likely level of general employment land for uses that typically require specific provision in the Local Plan (being offices and general industrial & warehousing). Emerging Policy 5 is also permissive of other uses being located on employment sites of a similar nature. Other employment sectors such as retail and leisure, sport and recreation will be guided to appropriate locations by other policies in the Plan.

The issue raised about the risk of "double counting" sites as supply for both general employment purposes and for strategic distribution sites has been

addressed by disaggregating the identified supply of large-scale strategic distribution sites including allocations or planning permissions from the general supply of employment land. More details are set out in the Publication Draft Employment Land Background Paper.

In relation to the arguments put forward by Marrons et al arguing that there is likely to be jobs growth far higher than anticipated in the ELS study, it is considered that the job generation figures relied on by the consultees are somewhat aspirational in nature and that generally planning policy should not rely on these. Marrons refer to a report The HS2 Station at Toton - An Assessment of the Economic Development Opportunities dated November 2016 which indicates HS2 led growth of between 33,000 to 91,000 jobs. This work focusses on opportunities and may be viewed as aspirational as evident in the sheer range of jobs potentially created. However, the Government announced on 4<sup>th</sup> October 2023 the scrapping of the proposed route for HS2 north of Birmingham including the proposed link to East Midlands Parkway (HS2 Leg 2B). Given the significant announcement of the scrapping HS2 2B north of Birmingham meaning the HS2 high speed line will no longer serve Nottingham and the aspirational nature of the job figures quoted, the Councils consider such job figures as set out in the 2016 report cannot be relied on.

Reference is made to the East Midlands Freeport website which refers to creating 60,000 jobs although the Planner Magazine in its issue dated 3<sup>rd</sup> April 2023 reporting that the Freeport has got the go head from Government in March 2023 refers to 28,000 jobs at the Freeport although this may be a reference to direct jobs. However, it has not been possible to examine any assumptions or the calculations underpinning these figures which appear to originate from the detailed business case for the Freeport which are not publicly available presumably due to their sensitive commercial nature. Given that there is no information there is no way of knowing how many jobs at the Freeport would be additional. This is a particularly pertinent issue in this case as most new strategic distribution floorspace provided (which is likely to make up a high percentage of floorspace being delivered) is to replace older warehouse space (see Icen Strategic Distribution Study for the Nottingham Core and Outer HMA (2022) paragraph 11.32 drawing on conclusions from their Leicester and Leicestershire Study). In any case it is quite likely that many of the jobs would be taken up by residents already living in the area as evidence in support of the Ratcliffe on Soar Local Development Order shows which is considered further below.

In addition, there has also been considerable progress in terms of implementing one of the three key sites within the Freeport at the East Midlands Gateway (SEGRO) site where over 370,000 sq. m of warehousing has been developed and these jobs already exist. The East Midlands Intermodal Park is listed as a national infrastructure project registered during 2014 but at the time of writing remains at the pre-application stage and therefore subject to some uncertainty. It is also located close to Burnaston to the southwest of Derby some distance from Greater Nottingham and likely to predominantly draw its labour from South Derbyshire, Derby and North Staffordshire.

Ratcliffe on Soar Power Station is now subject to an approved Local Development Order with planning permission for 810,000 square metres of commercial space.

Supporting evidence has been prepared as part of the Environmental Impact Assessment July 2022 chapter 16 socio-economic analysis which includes estimates of jobs for the construction and operational phases of the development. This analysis indicates that the operational phase of the project could result in approximately 6,000 jobs. However, the report states that much of the work force are expected to be already residents of the study area travelling from their permanent residence (the study area is extensive covering Broxtowe, Charnwood, Erewash, North West Leicestershire, Nottingham City and Rushcliffe Councils). The report goes on to explain that this is because there is a wide range of workers within multiple industries and at varying occupational levels within the study area.

It is worth bearing in mind that the ELS 2015 study took the then proposed HS2 Hub at Toton into account and uplifted the employment forecasts accordingly - the so called Policy-on scenario - which the Councils accepted as the basis for future planning for growth and which was used as evidence to support Part 2 Local Plans in preparation at that time. Accordingly, sufficient provision for employment and housing growth has been made in the adopted Broxtowe Borough Part 2 Local Plan (2019) at the Toton Strategic Location for growth and this provision has been effectively rolled forward into the emerging strategic plan. Further details on the homes and jobs balance are set out in the Employment Background Paper.

### **Distribution of employment**

In relation to the point made by the Rushcliffe Parishes about the amount and nature of the strategic allocations at Toton and particularly at Ratcliffe on Soar being inconsistent with regeneration objectives, the Councils consider that overall, the strategy is one of urban concentration that prioritises sites within and to a lesser extent adjoining the built-up area which would encourage regeneration. It is also the case that most job growth would take place on new and existing sites in the City Centre, town centres and on existing sites within the urban areas again supporting regeneration. However, both locations at Toton and at Ratcliffe on Soar provide particular advantages and opportunities to support job growth including in the more innovative sectors and are highly accessible to the local labour force.

Developers also made points in connection with the distribution of employment land referring to constraints in Nottingham City and where take up was negative for office and general employment over the monitoring period in contrast to the surrounding Boroughs where past trends indicated positive take up. Developers argued for more provision in Broxtowe and Rushcliffe. In addition, it was suggested that ONS data indicates jobs density to be low in both Broxtowe and Rushcliffe and in the case of Rushcliffe mention was made of high levels of commuter outflows to Nottingham in particular in the context that more jobs located within Rushcliffe Borough would reduce out commuting.

The Councils consider that the distribution of employment space is best considered across the Greater Nottingham area. The Councils refer to the Lichfields Employment Land Study 2021, which concludes that the Greater Nottingham area is a coherent Functional Economic Market Area (FEMA) where over 80% of residents live and work in the same area. The ELS 2021 includes an adjustment to compensate for “losses” of employment land which makes up a

substantial proportion of the assessed need. In the case of Nottingham City, it is accepted that the administrative boundaries mean that its potential supply of general industrial land is finite, and it must rely on the surrounding Boroughs to meet its needs for general employment land. Conversely Nottingham City Centre has the largest stock of office space and by far the largest supply of new office space and therefore the surrounding Boroughs rely on the City Centre for office-based jobs to a high degree.

In this context, it is to be expected that there will be relatively high levels of commuting into Nottingham from Broxtowe, Gedling and Rushcliffe Boroughs but given the accessibility of the City Centre especially by public transport this is considered sustainable.

The strategy is to focus most new jobs in the City Centre and town centres. However, significant provisions of employment are in strategic allocations in sustainable locations. Within Broxtowe provision is made for the strategic allocation at Toton which is expected to deliver 10,000 sq. m. of office and a significant amount of general employment land and a large employment opportunity exists involving the redevelopment of the former Ratcliffe on Soar Power Station site within Rushcliffe Borough. Overall, it is considered that there is more than enough general employment land and sufficient office space provision to meet the need across the HMA.

### **Ratcliffe on Soar and Toton strategic allocations**

Concerns were raised about the proposed allocation at Ratcliffe on Soar both in terms of its impact on the Green Belt (Rushcliffe Group of Parish Councils) and about the prospect of this large site not coming forward over the Plan period (various developers). Nottinghamshire County Council supported the proposed strategic allocation (PA/157). This site is now subject to an adopted Local Development Order (LDO) which grants automatic planning permission for specified development subject to conditions. The LDO is intended to speed decision making and help bring forward this site quickly. The site is located within the East Midlands Freeport, promoted by the East Midlands Development Company and the Councils consider that there are no undue constraints that would prevent this site coming forward over the plan period.

Broxtowe Borough Council adopted a Strategic Masterplan Supplementary Planning Document (SPD) for the Toton and Chetwynd Barracks Strategic sites in February 2023. These sites are currently allocated in the Broxtowe Borough Council Part 2 Local Plan which covers the period up to 2028 and required masterplans to be drawn up for the two sites. This combined Strategic Masterplan (SPD) is intended to help site promoters, developers and landowners create a successful place, to develop the sites comprehensively and to guide more detailed master planning of them. This site is also being promoted by the East Midlands Development Company and the Councils consider there are no undue constraints that would prevent the two sites coming forward and they are deliverable and developable. The Toton location has potential for creating a significant number of innovative jobs and includes proposals for an Innovation Campus. Smaller scale employment development is planned at the Chetwynd Barracks.

## **Strategic Distribution**

The Councils consulted on proposed sites for strategic distribution and logistics facilities between 26<sup>th</sup> September and 7<sup>th</sup> November 2023 (GNSP Strategic Distribution and Logistics: Preferred Approach Consultation). The site selection process was set out in the Strategic Distribution Background Paper which considered sites promoted through the preparation of the GNSP and from a “call for sites” exercise. The Publication Draft Strategic Plan retains the Former Bennerley Coal Disposal Point and Ratcliffe on Soar Power Station (Freeport) as locations for strategic logistics development and this is justified in the Site Selection Report and Employment Plan Background Paper.

Whilst employment land losses are accounted for in the ELS Study, it is not relevant to the Strategic Distribution study which uses different methodology, and this is clearly set out in the report.

## **Strategic Employment Allocations**

The support for the allocation at the Toton Strategic Location for growth is noted, a Masterplan SPD covering both the Toton and Chetwynd Barracks sites has now been adopted (February 2023). The support from the developer for the allocation at RAF Newton is also noted but there is no need for additional employment land at this location at present.

## **Alternative sites**

Site specific comments are dealt within the response to representations on Appendix A of the Preferred Approach (Preferred, Additional and Alternative Sites).

## **Employment land protection, retail uses and town centres**

In relation to the point about employment land “losses” by Boyer Planning, ELS 2021 has considered the issue of losses and taken these into account by including a replacement factor within the calculations of future employment needs for general industrial and warehousing land. This is set out in the Employment Background Paper, paragraphs 5.10 - 5.12.

The Councils agree with the West Bridgford Hockey Club (PA/523) that other uses including sport and leisure are significant in terms of the local economy and in employment terms. The employment chapter focusses on those land uses for which specific provision is made namely office, industrial and warehousing sectors based on evidence set out in the ELS 2021 study. However, other policies in the Greater Nottingham Strategic Plan will encourage the provision of sport and leisure facilities and set out criteria for guiding these to sustainable locations.

The point raised by LIDLs GB Limited (PA/607) that the Plan should specifically include a reference to retail uses being acceptable uses on former employment sites is not accepted. The location of new retail development requiring planning permission should be guided by the retail sequential test set out in national planning policy and national planning guidance which prioritises town centre

locations first. It is considered that the emerging employment policy is balanced in the context of protecting local employment opportunities and allowing for the appropriate change of use under certain conditions. The employment policy does recognise that some employment uses that are not within classes E(g), B2 and B8 may be suitable on protected employment sites if they are compatible.

It is accepted that university students do make an important contribution to the local economy both directly and indirectly. The importance of retaining graduates from the area's universities is recognised in paragraph 6.19 of the Preferred Approach.

Whilst the Greater Nottingham Strategic Plan will seek to encourage a range of housing types and tenures for all sections of the population, the provision of student housing is more a matter for future plan preparation, for example, the adopted Nottingham City Council Local Plan Part 2 includes specific policies. In addition, Nottingham City Council during July 2023 adopted The Nottingham Student Living Strategy 2023 - 2028 in partnership with the two Universities. This document sets out how partners can support students with their housing needs, improve the choice and quality of student accommodation, maximise the benefits of having a large student population and help to tackle any negative impacts this can have on local communities, businesses, and services.

The specific needs for places of worship and burial are more a matter for Councils to address in their future plan preparation.

The consultees support towards the aim of supporting the creation of around 52,500 jobs in noted. The aim of the Greater Nottingham Strategic Plan is to support the food and drink sector in general through its employment land provisions which is an important sector in the local economy. Noting that the specific issue raises reservations about alcohol related illnesses in connection with the alcoholic drinks sector, this is not really a matter than can be addressed through the Strategic Plan preparation process as it is more of a public health issue.

In response to the concerns raised by the local resident about increasing commuting to employment sites in Nottingham and Nottingham City Centre it is considered that these are the most sustainable locations. Transport policies in the plan seek to prioritise more active modes of transport and public transport ahead of road improvements by securing developer contributions towards these measures as part of any necessary mitigation works necessary to allow development to go ahead.

### **Changes Made**

The Plan period has been extended from 2038 to 2041 to enable the Plan to look forward 15 years from the anticipated date of adoption. The base date for the employment land provisions has been updated to 2023 and completions between 1<sup>st</sup> April 2018 and 31<sup>st</sup> March deducted. Details are set out in the Employment Background Paper.

Preferred Approach Strategic Distribution Consultation was undertaken in September 2023 and sites allocated in the Publication Draft GNSP.

Disaggregation of strategic distribution sites from the general supply of employment land to avoid “double counting” as recommended in the Iceni Report. Details are set out in the Publication draft Employment Background Paper.



## Preferred and Additional or Alternative Sites in Broxtowe

### *Preferred Sites*

#### **Field Farm (B08.4PA)**

Comments on this site were received from the following:

Sport England, Environment Agency and National Highways

#### **Summarised comments from statutory organisations**

Sport England stated that care should be taken with regard to the shared boundary with the playing field at Pit Lane and that the potential conflict between the football use and residential properties should be assessed.

The Environment Agency stated that they have no comment to make as they have provided extensive responses on this site previously. The majority of the site lies within flood zone 1 with a small amount lying within flood zones 2 and 3 however this has been assessed and mitigated.

National Highways has carried out a high-level assessment of the site. They identified that the site has a medium potential impact on the strategic road network, but the impacts are likely to be acceptable as the site already has planning consent.

#### **Councils' Response**

The above comments are noted. As the site already has planning consent, any issues raised will already have been considered and addressed through the grant of planning permission.

#### **Changes Made**

None

#### **Toton Strategic Location for Growth (B09.3PA)**

Comments on this site were received from the following:

The British Horse Society, Environment Agency, Natural England, National Grid, Chetwynd: The Toton and Chilwell Neighbourhood Forum, Lidl GB Ltd, The Crown Estate, Elton Garden Village Landowner Consortium, Strawson Group Investments, Taylor Wimpey, National Highways and Bloor Homes.

In addition to the above stakeholders four local residents submitted representations on this site.

#### **Summarised comments from statutory organisations**

The Environment Agency stated that they have no further comment to make as they have provided extensive guidance in respect of previous applications.

Natural England stated that good quality Green & Blue Infrastructure should be incorporated across the site connecting to both the adjacent Chetwynd site and the River Erewash valley to maximise both biodiversity value and public accessibility to nature. A long-term Green Infrastructure management and delivery plan should be provided and implemented.

National Grid highlighted that high voltage overhead power lines which cross the southern portion of the site. Due to National Grid's licence obligations and known engineering constraints with this particular site, the opportunities to divert or underground the line are extremely limited and the optimum solution may be to retain the lines in situ. In this context, National Grid raises no objection to the stated "preference" for the lines to be undergrounded but would object to any "requirement" for the allocation to include diversion/undergrounding of the lines.

National Highways has carried out a high-level assessment of the site. They identified that the site would have a high impact on the strategic road network and mitigation is likely to be required.

Chetwynd: The Toton and Chilwell Neighbourhood Forum query whether the 'Innovation Campus' is included in the Employment area figure as post the IRP announcement and loss of HS2 as an economic driver, this may need updating as part of a new growth strategy for the Strategic Location for Growth, to ensure major development can be delivered.

### **Summarised comments from developers**

The landowner with significant land interest at Toton Sidings (adjacent to the railway covering the southern end of the strategic location) states that it should be identified for residential and employment uses. The site was safeguarded as a potential site for the HS2 station, with flexibility on the allocation to allow for ancillary uses to be developed around the station on the residual land. They object to the site being used as a nature reserve as they consider that it is undeliverable and unsuitable use of this sustainable previously developed site. They express concern regarding a lack of engagement with landowners and highlight a need for further consultation and master planning.

One developer states that further land to the east of Toton Lane is required to achieve the ambitions for the Toton area. This additional site could facilitate the delivery of infrastructure, particularly the Toton Link Road, which would help with the development of housing and employment in the area.

A national retailer states that significant allocations, such as Toton, should include retail and amenity uses, including food store provision.

A number of responses state that, following the publication of the Integrated Rail Plan, there will be less economic investment and therefore it is questioned whether Toton should be allocated for the full 1,400 homes originally proposed. The responses state that the previous allocation should not be rolled forward due to the change of circumstances. The transport model will also require re-basing taking into account the Integrated Rail Plan proposals before it can be used to assess accurately the transport impacts of new development.

Responses also state that it is unrealistic to assume that delivery will begin in 2024 and the scale of delivery, particularly at the beginning is also unrealistic. They state that it is also not clear from the trajectory whether the reserved matters application for 282 dwellings is already accounted for in commitments.

### **Summarised comments from other organisations**

The British Horse Society state that the bridleways and quiet roads in the vicinity would be affected by a development. They request that the public rights of way will be at least protected and preferably extended (along the green corridors mentioned) for all vulnerable road users including equestrians.

### **Summarised comments from local residents**

A resident raises concern regarding the relationship with development sites and D2N2 "Local Cycling & Walking Infrastructure Plan" (LCWIP) which fails to adequately plan for cycling/ walking infrastructure which is needed to underpin development. In parallel with master planning of the Toton/Chetwynd development there should be production of an LCWIP for the area within 5 miles of the development (or an equivalent update to the D2N2 LCWIP). There should be a forward-looking LCWIP which shows safe cycle-routes between the Toton Development and Ratcliffe-on-Soar, and between the Chetwynd Development and Ratcliffe-on-Soar.

One resident stated that consideration should be given to moving the substation (west of Toton Lane) and the Water Treatment works.

Another stated that the employment units' section requires clarity as it is unclear whether the innovation campus forms part of the mixed employment use.

### **Councils' Response**

Comments from the Environment Agency, National Grid and Natural England are noted. The enhancement of blue and green infrastructure forms a key part of the development requirements for the site. In respect of the comments from National Highways, detailed transport modelling, in consultation with National Highways, has been undertaken.

The housing and employment figures have been reviewed as part of the changes which have taken place to the site, including the loss of HS2. The policy includes provision for a range of uses on the site. It also sets out the infrastructure requirements which are based on updated transport modelling and viability work. The delivery assumptions have also been reviewed.

Additional land has also been allocated to facilitate the delivery of key road infrastructure.

Public rights of way and walking and cycling infrastructure form an important element of the connectivity and movement framework and the wider blue and green infrastructure strategy for the site.

The site has also been combined with Chetwynd Barracks to form a single policy to enable a coherent and comprehensive approach to development, in accordance with the adopted Toton and Chetwynd Barracks Masterplan SPD.

### Changes Made

The policy reflects updated housing and employment figures and includes development requirements, including the provision of infrastructure.

Additional land has been allocated and removed from the Green Belt.

The site has been combined with Chetwynd Barracks to form a single policy.

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### Chetwynd Barracks (B09.4PA)

Comments on this site were received from the following:

The British Horse Society, Environment Agency, Natural England, Homes England and the Defence Infrastructure Organisation, Chetwynd: The Toton and Chilwell Neighbourhood Forum, Strawson Group Investments, Elton Garden Village Landowner Consortium, Taylor Wimpey, The Crown Estate and National Highways.

In addition to the above stakeholders three local residents submitted representations on this site.

### Summarised comments from statutory organisations

The Environment Agency stated that the proposed development is located fully within Flood Zone 1 and lies outside of the modelled breach events. Given the previous use of the site as an army barracks there is a possibility that land contamination may be present and future development will need to demonstrate that contamination risks will be adequately addressed. The site is situated on a secondary aquifer and care needs to be taken to protect the groundwater resource.

Natural England stated that Blue & Green Infrastructure should be incorporated across the site and connecting to the nearby Toton site. A long-term Green Infrastructure management and delivery plan should be provided and implemented.

National Highways has carried out a high-level assessment of the site. They identified that the site would have a high impact on the strategic road network and mitigation is likely to be required.

Chetwynd: The Toton and Chilwell Neighbourhood Forum stated that there needs to be clarity regarding how much of the site will be brought forward for development as the DIO are not including the land owned by Annington Homes in their master planning work (approximately 15/16ha). Under enhancements to open space and green infrastructure, the barracks playing fields & pavilion should be included to be retained and improved. Hobgoblin Wood should also be named as part of the green infrastructure to be retained and maintained.

### Summarised comments from developers

Homes England and the Defence Infrastructure Organisation stated that, whilst they welcome the inference that the site is one that ought to begin delivering new housing quite swiftly once it becomes available for development, the publication of Future Soldier in 2021 indicated that the site will be vacated in 2026, so that it is not likely to

be until then that works can begin on site. Whilst they are confident that the site is one that can begin delivering housing in the first five years of the Plan, they think that the partner authorities would be best served if they were to indicate delivery commencing in year 4 or 5 onwards. They raise concerns regarding unclear wording relating to secondary education provision and to heritage assets which needs clarifying within the site pro-forma.

A number of responses from developers stated that the start year and rate of delivery are not considered to be justified or realistic. This will reduce the Council's supply in the Plan period which should result in additional sites being allocated. A response also highlights the infrastructure challenges of delivering the site.

### **Summarised comments from other organisations**

The British Horse Society highlighted that Beeston bridleways 21, 27 and 28 are in the vicinity and therefore seek assurance that the public rights of way will at least be protected and preferably extended.

### **Summarised comments from local residents**

A resident raised concern regarding the relationship with development sites and D2N2 "Local Cycling & Walking Infrastructure Plan" (LCWIP) which fails to adequately plan for cycling/ walking infrastructure which is needed to underpin development. In parallel with master planning of the Toton/Chetwynd development there should be production of an LCWIP for the area within 5 miles of the development (or an equivalent update to the D2N2 LCWIP) (PA/81). There should be a forward-looking LCWIP which shows safe cycle-routes between the Toton Development and Ratcliffe-on-Soar, and between the Chetwynd Development and Ratcliffe-on-Soar.

One resident stated that there needs to be clarity that the area occupied by Ministry of Defence Housing (Annington Homes) is not part of the Chetwynd Barracks area and therefore the total area of land is 75ha and that the playing fields in the south-west of Chetwynd Barracks should be retained and improved.

### **Councils' Response**

Comments from the Environment Agency and Natural England are noted. The enhancement of blue and green infrastructure, including wider connectivity, forms a key part of the development requirements for the site. In respect of the comments from National Highways, detailed transport modelling, in consultation with National Highways, has been undertaken.

The trajectory has been updated based on the comments provided. Clarification has also been provided within the policy regarding infrastructure requirements. Analysis has also been undertaken to identify total site capacity, which includes existing areas of housing within the barracks being retained.

Public rights of way and walking and cycling infrastructure form an important element of the connectivity and movement framework and the wider blue and green infrastructure strategy for the site.

The site has also been combined with Toton SLG to form a single policy to enable a coherent and comprehensive approach to development, in accordance with the adopted Toton and Chetwynd Barracks Masterplan SPD.

#### **Changes Made**

Delivery trajectory has been updated.

The site specific policy has been produced to reflect the above response and has been combined with Toton SLG.

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#### **Boots (B11.1PA/NC1.5PA)**

Comments on this site were received from the following:

Environment Agency and National Highways.

#### **Summarised comments from statutory organisations**

The Environment Agency state they have no further comment to make in addition to those already supplied under 14/00515/OUT and 14/02038/POUT and the subsequent requests for discharge of conditions.

National Highways has carried out a high-level assessment of the site. They identify that the site has a medium potential impact on the strategic road network, but the impacts are likely to be acceptable as the site already has planning consent.

#### **Councils' Response**

The above comments are noted. As the site already has planning consent, any issues raised will already have been considered and addressed through the grant of planning permission.

#### **Changes Made**

None

#### *Additional or Alternative Sites*

Representations promoting or commenting on additional or alternative sites were received from the following:

Brinsley Land Trust, Mulberry Land, Bloor Homes, Mr R Taylor, R Salmon, Hall Construction Services, Omnivale Pension Scheme and Peveril Securities, Parker Strategic Land Ltd, Harworth Group PLC, MyPad 2020 Limited, Parker Strategic

Land Limited and William Davis Homes, Permission Homes, Peveril Securities Limited, Mr M Hodgkinson, Taylor Wimpey and Strawson Group Investments.

### **Land East of Church Lane, Brinsley**

Brinsley Land Trust propose an additional site allocation in Brinsley at Land East of Church Lane. The land is situated south-west of land allocated under Policy 5.1 in the Broxtowe Part 2 Local Plan. The site has a sustainable access point from the public highway and is considered to be available, able to deliver the provision of additional homes anticipated for Brinsley, able to provide sustainable access, would link to and help masterplan the long term preservation of the allocated open space, preserve the open vista between the headstocks and St James The Great Church, and provide an enhanced environment and amenities for inhabitants of the settlement of Brinsley.

#### **Councils' Response**

It is considered that the site does not meet the strategic threshold required for further consideration in the Strategic Plan.

#### **Changes Made**

None

### **Shilo Way, Awsworth**

Mulberry Land propose an additional site approximately 11.3ha to the north-east and south-west of Shilo Way, Awsworth. The land is currently vacant, used as pasture land and is within the Green Belt. It has direct access from Shilo Way, and it is stated that it has good connectivity and is available for immediate development.

#### **Councils' Response**

It is considered that the site does not meet the strategic threshold required for further consideration in the Strategic Plan. A separate exercise has been undertaken to assess whether the site is suitable for logistics development.

#### **Changes Made**

None

### **Mansfield Road, Eastwood**

Bloor Homes propose a site at east of Mansfield Road, Eastwood (16.69ha). The site is 16.7ha and an initial masterplan shows a capacity for circa 280 new homes. They state that the site is in a sustainable location and is available and deliverable. Provision of open space and connectivity links are highlighted.



### **Councils' Response**

It is considered that the site does not meet the strategic threshold required for further consideration in the Strategic Plan.

### **Changes Made**

None

## **Hill Top Farm, Stapleford**

Mr R Taylor proposes a site at Hill Top Farm, to the east of Stapleford. They highlight the relationship of the site to the development at Toton and provide a concept masterplan showing that residential development would be delivered on part of the site with other parts providing open space and protecting the Prominent Area and existing public rights of way.

### **Councils' Response**

The response is noted. The proposed approach to housing provision and distribution within Broxtowe is outlined in the Publication GNSP and Housing Background Paper. It is proposed that strategic sites allocated by the existing Aligned Core Strategy should be carried forward as part of the GNSP, in addition to sites allocated within the Broxtowe 2 Part Local Plan and therefore there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### **Changes Made**

None

## **East of Toton Lane**

Bloor Homes also propose a site to the east of Toton Lane. They state that the site will help to meet the ambitions and emerging plans for development at Toton which would include delivery of the Toton Link Road. A concept masterplan is provided which includes 1000 new homes and a new country park.

### **Councils' Response**

The response is noted and part of the site East of Toton Lane has been allocated to facilitate the delivery of transport infrastructure. However, it is considered that significant Green Belt release is not required to meet the Council's housing need and therefore exceptional circumstances to release Green Belt do not exist and it is not proposed to allocated all of the proposed site being promoted.



### Changes Made

Additional allocation on part of the site being promoted to facilitate the delivery of transport infrastructure.

## Nottingham Business Park and East of Woodhouse Way

R Salmon propose a 12ha site at land at M1, J26 to provide a sustainable extension to existing built form at Nottingham Business Park and east of Woodhouse Way. They state that the site should be considered as a reasonable alternative, particularly in the context of the site's ability to come forward on a strategic scale in collaboration with the neighbouring sites.

### Councils' Response

The response is noted. The proposed approach to housing provision and distribution within Broxtowe is outlined in the Publication GNSP and Housing Background Paper. It is proposed that strategic sites allocated by the existing Aligned Core Strategy should be carried forward as part of the GNSP, in addition to sites allocated within the Broxtowe 2 Part Local Plan and therefore there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

A separate exercise has been undertaken to assess whether the site is suitable for logistics development.

### Changes Made

None

## Land to the east of Awsworth

Hall Construction Services propose a site at land to the east of Awsworth. The site is 33.7 ha and would ensure that housing, including affordable housing, is provided in the north of Broxtowe. They highlight that the site has defensible features which could be used to define the boundary to the Green Belt and could incorporate significant landscape elements.

### Councils' Response

The response is noted. The proposed approach to housing provision and distribution within Broxtowe is outlined in the Publication GNSP and Housing Background Paper. It is proposed that strategic sites allocated by the existing Aligned Core Strategy should be carried forward as part of the GNSP, in addition

to sites allocated within the Broxtowe 2 Part Local Plan and therefore there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None

### **Land at Low Wood Road, Nuthall**

Omnivale Pension Scheme and Peveril Securities propose a site at Land at Low Wood Road, Nuthall. The site is identified as having the capacity to deliver up to 1,850,000 sq. Ft. of premium logistics and distribution space within close proximity to the strategic transport network and local labour force. They state that the site would be particularly well suited for much needed 'final mile' logistics requirements given the location close to the urban edge of Nottingham.

#### **Councils' Response**

The response is noted. A separate exercise has been undertaken to assess whether the site is suitable for logistics development.

#### **Changes Made**

None

### **Land at Nottingham Road, Trowell**

Parker Strategic Land Ltd propose an additional site for land at Nottingham Road, Trowell. The site is 14ha and has the capacity to deliver approximately 500 dwellings. The submission includes a masterplan, detailed analysis of landscape, visual impact and Green Belt and highways access strategy.

#### **Councils' Response**

The response is noted. The proposed approach to housing provision and distribution within Broxtowe is outlined in the Publication GNSP and Housing Background Paper. It is proposed that strategic sites allocated by the existing Aligned Core Strategy should be carried forward as part of the GNSP, in addition to sites allocated within the Broxtowe 2 Part Local Plan and therefore there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### Changes Made

None

## Former Bennerley Coal Disposal Point

Harworth Group PLC have submitted the Former Bennerley Coal Disposal Point site for consideration as an employment development. The site is previously-developed, and they consider there are exceptional circumstances that justify the site being removed from the Green Belt. The wider area provides the flexibility to meet Broxtowe's employment needs.

### Councils' Response

The response is noted. A separate exercise was undertaken to assess whether the site is suitable for logistics development which has resulted in the site being proposed for allocation.

### Changes Made

None

## Coventry Lane, Bramcote

MyPad 2020 Limited propose an additional site for land off Coventry Lane, Bramcote. They state that the site is available, suitable and deliverable and that access can be provided off Coventry Lane. Reference is also made to engaging with Parker Strategic Land who are promoting the adjacent land to the north-west.

### Councils' Response

The response is noted. The proposed approach to housing provision and distribution within Broxtowe is outlined in the Publication GNSP and Housing Background Paper. It is proposed that strategic sites allocated by the existing Aligned Core Strategy should be carried forward as part of the GNSP, in addition to sites allocated within the Broxtowe 2 Part Local Plan and therefore there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### Changes Made

None

## Catstone Green

Parker Strategic Land Limited and William Davis Homes propose a site to the west of Nottingham, referred to as Catstone Green. As a sustainable urban extension, they state the site could provide up to 2,200 new homes of mixed tenure, community benefits and more than 100ha of green infrastructure. Various supporting evidence reports are included including a vision document, a landscape report and a transport strategy.

#### **Councils' Response**

The response is noted. The proposed approach to housing provision and distribution within Broxtowe is outlined in the Publication GNSP and Housing Background Paper. It is proposed that strategic sites allocated by the existing Aligned Core Strategy should be carried forward as part of the GNSP, in addition to sites allocated within the Broxtowe 2 Part Local Plan and therefore there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None

### **Land West of Moorgreen, Eastwood**

Permission Homes propose a site at land West of Moorgreen on the eastern edge of Eastwood. They state that Eastwood is a Key Settlement for growth (as identified in the Aligned Core Strategy) containing the widest range of facilities and services in Broxtowe borough outside of the main built-up area of Nottingham. The site has a capacity of circa 500-750 homes which have the potential to be delivered over the Plan period and/ or beyond.

#### **Councils' Response**

The response is noted. The proposed approach to housing provision and distribution within Broxtowe is outlined in the Publication GNSP and Housing Background Paper. It is proposed that strategic sites allocated by the existing Aligned Core Strategy should be carried forward as part of the GNSP, in addition to sites allocated within the Broxtowe 2 Part Local Plan and therefore there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None

## Japanese Water Garden site and land adjacent Bardills Garden Centre

Peveril Securities Limited propose that the Japanese Water Garden site, together with the adjacent Bardills Garden Centre site, should be removed from the Green Belt. It is a brownfield site within the Green Belt and should score zero against each of the 5 Green Belt criteria. Inclusion of the site can ensure comprehensive planning with the wider Toton and Chetwynd Barracks sites.

### Councils' Response

The response is noted and this site has been included in the Toton SLG and Chetwynd Barracks allocation in order to facilitate the delivery of key transport infrastructure.

### Changes Made

Proposed to be included within the Toton SLG and Chetwynd Barracks allocation.

## Land west of Hucknall

Mr M Hodgkinson proposes a site at west of Hucknall which has the capacity to deliver in excess of 1000 dwellings, including community facilities, infrastructure and strategic open space. The site is in Green Belt, but they consider that there are exceptional circumstances which justify the sites removal and that the site is in an optimal location for growth.

### Councils' Response

The response is noted. The proposed approach to housing provision and distribution within Broxtowe is outlined in the Publication GNSP and Housing Background Paper. It is proposed that strategic sites allocated by the existing Aligned Core Strategy should be carried forward as part of the GNSP, in addition to sites allocated within the Broxtowe 2 Part Local Plan and therefore there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### Changes Made

None

## Chilwell Lane, Bramcote

Taylor Wimpey propose a site at Chilwell Lane, Bramcote. The site is close to the NET network and is adjacent to Chilwell where there are a number of existing

services. They state that the site could be brought forward as part of a more strategic urban extension or in isolation as a smaller contained development.

#### **Councils' Response**

The response is noted. The proposed approach to housing provision and distribution within Broxtowe is outlined in the Publication GNSP and Housing Background Paper. It is proposed that strategic sites allocated by the existing Aligned Core Strategy should be carried forward as part of the GNSP, in addition to sites allocated within the Broxtowe 2 Part Local Plan and therefore there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None

### **Land at Cossall Road, Trowell**

Strawson Group Investments Ltd propose at site at Land at Cossall Road, Trowell. They state that the site was identified in the Growth Options Study as a potential area for strategic growth and that it could deliver between 400-500 dwellings, including social infrastructure and a sufficient green buffer to prevent coalescence with Cossall.

#### **Councils' Response**

The response is noted. The proposed approach to housing provision and distribution within Broxtowe is outlined in the Publication GNSP and Housing Background Paper. It is proposed that strategic sites allocated by the existing Aligned Core Strategy should be carried forward as part of the GNSP, in addition to sites allocated within the Broxtowe 2 Part Local Plan and therefore there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None

## Preferred and Additional or Alternative Sites in Gedling

### *Preferred Sites*

#### **Teal Close (G11.2PA)**

Comments on this site were received from the following:

British Horse Society, Environment Agency, Hammond Farm, Langridge Homes, Midlands Land Portfolio and National Highways.

#### **Summarised comments from statutory organisations**

The Environment Agency have no further comments to make regarding Teal Close as the previously proposed extension to the housing allocation has since been removed.

National Highways noted that the Teal Close site is identified as a site that already has planning consent, that is likely to have a medium impact on the strategic road network and is likely to be acceptable.

#### **Summarised comments from developers**

Two developers promoting sites elsewhere in Gedling Borough support this existing strategic allocation and also Gedling Borough Council's decision to remove the proposed extension to the Teal Close allocation, originally planned for 360 new homes, which is in Flood Zone 2 where a sequential test would have been required to justify its allocation.

Midlands Land Portfolio considered the removal of the site requires a full understanding and balancing of a number of relevant considerations. It is not considered that the decision reflects a sufficiently broad judgement that is required. The published consultation documents provide no indication where the dwellings lost from this allocation will be redistributed as part of a robust consideration of alternative scenarios and their environmental credentials. Rather, it appears to arbitrarily remove the site from the overall housing figure to be provided in Gedling and potentially undermines the spatial strategy which underpins plan making.

The Plan in its current form would not provide sufficient flexibility in land supply to meet the needs of the Borough. Furthermore, the site is located within a highly sustainable location, on the edge of the urban area of Nottingham, in accordance with the settlement hierarchy. The NPPF requires taking account of 'reasonable alternatives' in forming an appropriate strategy based on proportionate evidence. This has yet to be demonstrated.

#### **Summarised comments from other organisations**

The British Horse Society note that green infrastructure (GI) includes accessible paths. These should be futureproofed by being multi-user to include pedestrians, cyclists, horse riders, users of mobility scooters and wheelchairs.

#### **Councils' Response**

The above comments are noted. As the site already has planning consent, any issues raised will already have been considered and addressed through the grant of planning permission.

Additional land at Teal Close was considered as a reasonable alternative through the site selection process and an area of land was assessed as suitable for allocation. The Cabinet meeting on 8<sup>th</sup> December 2022 approved the Greater Nottingham Strategic Plan Preferred Approach document and Sustainability Appraisal in so far as it related to Gedling Borough 'with the exception of proposals to release Green Belt land at Teal Close, in light of the Ministerial Statement made on 6th December 2022 and to be made clear in an updated National Planning Policy Framework'. The National Planning Policy Framework states at paragraph 145 that there is no requirement for Green Belt boundaries to be reviewed as part of plan preparation and the principle of only altering boundaries in exceptional circumstances remains unchanged. By allocating existing safeguarded land to extend the Top Wighay Farm site, no change to the Green Belt boundary is proposed by the Greater Nottingham Strategic Plan.

#### **Changes Made**

None.

### **Gedling Colliery/Chase Farm (G09.3PA)**

Comments on this site were received from the following:

British Horse Society, Environment Agency, Hammond Farms, Langridge Homes, and National Highways.

#### **Summarised comments from statutory organisations**

The Environment Agency have provided feedback previously on the Gedling Colliery/Chase Farm site and have no further comments to make regarding this site allocation.

National Highways commented that the Gedling Colliery/Chase Farm site is identified as a site that already has planning consent, that is likely to have a medium impact on the strategic road network and is likely to be acceptable.

#### **Summarised comments from developers**

Two responses from developers support this existing strategic allocation which now benefits from access to the Gedling Access Road (GAR). Based on the Housing Trajectory they noted that this site will be complete by 2029/30.

#### **Summarised comments from other organisations**

The British Horse Society is aware that access on and off road in the area is limited and requests formal assurance of how any proposed development would mitigate risk to vulnerable road users in the vicinity as a development would increase the volume and frequency of motorised traffic in the area.

#### **Councils' Response**



The above comments are noted. As the site already has planning consent, any issues raised will already have been considered and addressed through the grant of planning permission.

#### **Changes Made**

None.

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### **Top Wighay Farm (G03.1/G03.2PA)**

Comments on this site were received from the following:

Ashfield Independent Hucknall Councillors, British Horse Society, Councillor Martin Smith, Environment Agency, Hammond Farms, Hayden Lester, Historic England, Langridge Homes, Linby Parish Council, Natural England, National Highways, Papplewick Parish Council, Pegasus, Savills, Sports Council and WSP.

In addition, eight comments on this site were received from local residents.

#### **Summarised comments from statutory organisations**

The Environment Agency have no comment to make with regard to this proposed extension given that the site lies within flood zone 1.

Natural England suggest that appropriate green buffers should be incorporated into the TWF development to mitigate impacts on both the LWS and the Sherwood possible potential Special Protection Area (ppSPA).

Historic England has concerns regarding the proposed extension at the Top Wighay Farm site given its potential impact on the Grade II\* Annesley Hall Registered Park and Garden and associated historic landscape and relationship with other assets in this setting. They are also concerned about the potential cumulative impact considering the proposed site allocations within the Ashfield Local Plan across the border on the significance of this heritage asset, including its setting. Noting the initial assessment information within the Site Selection Report, they do not consider it is a sound approach to propose the site for allocation at this time and rely on the heritage policy during the planning application stage. The principle of development is being established through the Local Plan, and as such the appropriate evidence should be available to justify its inclusion. Historic England consider that further assessment is required.

Linby Parish Council suggest that the TWF site should link to the Linby-Newstead disused railway as an active travel route, in accordance with the Blue-Green Infrastructure Strategy and given capacity issues on the highway network. The SFRA does not take account of recent development and noted that Linby Parish is susceptible to groundwater flooding. Concern regarding encroachment on Linby Quarries SSSI was raised. The safeguarded land has not been released as a strategic allocation. Therefore, the presumption to demonstrate it as a proposed sustainable urban extension that is being masterplanned is premature. It identifies the sites as 'urban extension', without the land being released from the green belt. To pre-empt the outcome of green belt review is potentially unlawful.

Papplewick Parish Council noted the plan proposes major housing development around Papplewick of around 1,600 homes which will create additional road journeys. New residents will look to Hucknall for their needs and the plan will not contribute to provision of these services. There is no mention of how the 20-minute neighbourhood approach impacts on the proposed plans for Top Wighay. There are no recommendations to mitigate impacts or enhance the public transport network.

National Highways note the Top Wighay Farm site is identified as a site that is likely to have a medium impact on the strategic road network and is likely to be acceptable subject to mitigation.

### **Summarised comments from developers**

Two developers supported the implementation of the existing strategic allocation site for 805 dwelling units, but do not support the extension. They consider the housing trajectory for the site optimistic given that Reserved Matters need to be submitted and approved.

Nottinghamshire County Council as landowner and Hallam Land Management welcome the proposed allocation of Top Wighay Farm. However, the Preferred Approach consultation includes a proposed allocation of part of this safeguarded land for 640 dwellings. This is a missed opportunity, as the site can sustainably accommodate up to 900 dwellings with associated infrastructure and should be allocated in full to avoid piecemeal development of this site. The safeguarded land at Top Wighay provides a more sustainable and logical alternative for meeting the needs not met by the Teal Close extension and should be considered ahead of the proposed approach which redirects this number of homes to Key Settlements.

The technical reports accompanying this representation have found no evidence or other justifiable reason to discount part of site G03.1/G03.2PA due to landscaping/visual impacts, heritage impacts or ecological impacts.

Another landowner raised concerns regarding focussing development on Hucknall being outside the plan area and the focus of development in the Ashfield plan. Delivery of the Top Wighay Farm site should be moved back by at least two years to account for the time taken to gain an implementable planning approval.

A national supermarket recommended that the strategy for housing in the plan area takes greater account of the 20-minute neighbourhood and ensuring that communities have access to facilities and amenities, such as food stores. They propose and support that the allocation includes reference to retail and amenity uses (to ensure they are consistent with the Plan's vision regarding the 20-minute neighbourhood).

### **Summarised comments from other organisations**

The British Horse Society requested formal commitment to providing solutions for safe access for horse riders and other vulnerable road users across the A611 to public rights of way.

### **Summarised comments from local residents**

Ashfield Independent Councillors object to the site. It was highlighted that the Development Brief 2017 noted that any future development on the safeguarded land may require the provision of a third access to Hucknall Road to facilitate connections

to Newstead railway station and it is unclear whether this further access is being considered. Extending the Top Wighay site to the north means it is increasingly disconnected from the services and infrastructure of Hucknall. Providing 1,650 dwellings adjacent to Hucknall does not assist in the regeneration of Arnold and Carlton. Hucknall infrastructure cannot cope with the additional housing, despite the plans for a new health centre. Major development in Hucknall must be supported by improvement in healthcare. There is a lack of detail about the plans to integrate the development into the wider community of Hucknall, in relation to transport and other infrastructure.

One GBC Councillor stated that consideration should be given to the extra vehicles that will travel through Linby and Papplewick as there are currently far too many vehicles travelling through these two small communities.

Local residents raised concerns about the impact of the site on local services and infrastructure with a number commenting that Hucknall infrastructure cannot cope with the additional housing for example, schools are oversubscribed. Provision from S106 and CIL to fund infrastructure improvements needs to be in place before houses are occupied. One resident mentioned that the ACS inspector capped development adjacent to Hucknall at 1300 dwellings due to concerns of the impact on Hucknall. The existing allocation provides 17% affordable housing on viability grounds, how does extending the allocation provide affordable housing in a timely manner?

Local residents also raised concerns about loss of wildlife, Green Belt and risk of flooding.

### **Councils' Response**

The above comments are noted. In relation to that part of the site which has planning consent subject to S106, any issues raised will already have been considered and addressed through the grant of planning permission.

In relation to the extension to the allocation proposed through the Preferred Approach consultation, the comments raised are addressed through the updated site selection document which also explains how the site accords with the spatial strategy. Clarity regarding supporting infrastructure is provided by the site-specific policy in the publication draft Greater Nottingham Strategic Plan.

It should be noted that the site selection document has been updated to reflect that the boundaries of the proposed extension to the allocation have been amended.

It is noted that Ashfield District Council are no longer proposing to allocate land for development to the west of the A611.

The trajectory for the Top Wighay Farm site will be updated to reflect the information from the 2022/23 SHLAA. The 2022/23 SHLAA will be based on information provided by housebuilders and developers and in accordance with the common SHLAA methodology.

### Changes Made

None. Note the amended boundary to the proposed extension to the existing allocation.

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### North of Papplewick Lane (G03.4PA)

Comments on this site were received from the following:

Environment Agency, Friends of Moor Pond Woods, Hammond farms, Langridge Homes, National Highways and Papplewick Parish Council.

In addition, one comment was received from a local resident on this site.

### Summarised comments from statutory organisations

The Environment Agency had no further comment to make regarding the allocation as they provided detailed guidance on the planning application.

National Highways noted that the site is identified as a site that already has planning consent, that is likely to have a low impact on the strategic road network and is likely to be acceptable.

Papplewick Parish Council were concerned that major house building around Papplewick will create additional road journeys. They estimated that the total of more than 1600 new homes will realistically house between three and four thousand new residents who will look to Hucknall for their healthcare, leisure, education and other needs. This plan will not contribute to provision of those services. The background documentation to these planned proposals provides no assessment of present provision nor of proposed future needs. It is disappointing that the impact of the plans on that infrastructure are not considered nor are there suggestions for mitigation of the impact. For example, in Table 2.13 seven key topics are down as 'TBA'. These include important basics including water.

It is not explained how consideration of the 20-minute neighbourhood has been made in the proposed plans for Top Wighay.

### Summarised comments from developers

Two developers supported the completion of this existing allocation.

### Summarised comments from other organisations

Friends of Moor Pond Woods noted the recognition of the Moor Pond Woods site as strategic green infrastructure. They raised a concern about increased pressure on the site and its facilities from visitors and seek clarification on whether the developers and/or Local Authority contribute in future - to offset the impact of their plans and mitigate the more intensive use of the site.

### Councils' Response

The above comments are noted. As the site already has planning consent, any issues raised will already have been considered and addressed through the grant of planning permission.

**Changes Made**

None.

## *Additional or Alternative Sites*

### **Land south of Oxtan Road (G06.1PA)**

Bellway Homes, Metacre and Persimmon are promoting sites on land off Oxtan Road. The site is assessed as being 'suitable' for development (The Greater Nottingham Growth Options Study (July 2020)) and is safeguarded by the Gedling Local Plan Part 2 and identified as the "North-West Quadrant Urban Extension" in the Calverton Neighbourhood Plan (2017). Bellway Homes consider that the site represents an opportunity for a mixed-use scheme, incorporating approximately 555 dwellings, a food store, Public Open Space, green infrastructure, landscaping and biodiversity enhancements and pedestrian, cycle, and vehicular access. Persimmon consider that there is no sound reason that the safeguarded land should not be allocated. The site can accommodate up to 650 dwellings as supported by the conclusion of the 2022 SHLAA.

Bellway Homes referred to a shortfall of housing in Gedling Borough by 2041 of around 632 homes and also raised concerns over the deliverability of the Top Wighay Farm site within the timescales assumed. Consideration should be given as to whether the plan should focus growth elsewhere instead of relying on the extension of an allocation to deliver around 18% of Gedling Borough's housing needs. No further sites would be needed through the Part 2 Local Plan process, allowing the comprehensive strategic planning of the Greater Nottingham area. The land off Oxtan Road is therefore in a highly accessible location for local services and benefits from sustainable public transport access.

A local landowner agreed with assessments of the six reasonable alternatives apart from this site. Capacity is 450 dwellings and adjoins existing site, so should be considered strategic. Unclear how the capacity of site has been assessed. Propose new strategic allocation at G06.1PA to include a minimum of 450 homes and a food store. Site is safeguarded land and as much housing as possible should be provided on non-Green Belt sites in light of NPPF revisions to be adopted by March 2023.

### **Councils' Response**

The site has been considered through the site selection process which concludes that the site is not being considered for allocation as a strategic site. Further consideration will be given as to whether part of the site is appropriate for allocation within the subsequent Local Plan.

The site adjoins an existing allocation adjoining the Key Settlement of Calverton and comprises most (but not all) of the existing area of safeguarded land. The area of safeguarded land which is not included within this reasonable alternative site is identified as Local Green Space in the Calverton Neighbourhood Plan. Development of the site would encroach upon the rural and open landscape setting and have an impact on the setting of the Scheduled Monument Roman Camp on Whinbush Lane and setting of grade II Listed Lodge Farm. The level of impact would be high. Account would need to be taken of the ppSPA and potentially the need for some landscape buffers.

### **Changes Made**

None.

### **284 Longdale Lane, Ravenshead**

The landowner identifies this 9-acre site as a location for affordable housing and or council housing built on it.

#### **Councils' Response**

This site is not considered to be strategic and will be considered through the preparation of the subsequent Local Plan.

#### **Changes Made**

None.

### **Land at Middlebeck Farm, Mapperley (G07.2/G07.3PA)**

Barwood Land consider this site suitable for housing as it meets the overall strategy and contributes towards the additional housing need identified by them. Submissions have previously been made, and the site was assessed under 2022 SHLAA.

Conlon Construction Ltd support paragraph 4.4 and the concept of the 20-minute neighbourhood. It is considered that the GNSP and the subsequent Gedling Local Plan should focus on the Mapperley/Mapperley Plains area for new growth, being sustainable and generating land values to support investment. Two masterplans are provided showing how 500 and 1000 homes could be delivered north of Spring Lane and east of the B684.

#### **Councils' Response**

The site has been considered through the site selection process, which concludes that site is not being considered for allocation as a strategic site. Further consideration will be given as to whether part of the site is appropriate for allocation through the subsequent Local Plan

The site adjoins the main urban area to the east, although is separated from the urban area to the south. Development would be likely to impact on the landscape character area of the Lambley Dumble and encroach into views of the Dumbles from Mapperley Plains. Consequently, the capacity of the site would be reduced to a level which is not considered to be strategic in scale.

#### **Changes Made**

None.

### **Land at Stockings Farm, Redhill (G07.1PA)**

Duplicate comments submitted by Langridge Homes and Hammond Farms as joint owners of the site. This site accords with the planning strategy and could accommodate 700 dwellings (plus a P&R site and employment park) or 1000



dwellings (with a reduced employment area and no P&R). Other facilities would include a primary school, neighbourhood centre, health centre, library, community centre and sports fields. Access would be from Leapool Island and Lime Lane. Mansfield Road is a well-served public transport corridor. Bestwood Country Park could be extended through the development to connect with the NTWT LWS along Calverton Road. Development could commence in 2028/29 and completion is anticipated in around 10 years. However, it is acknowledged that the site would be partly dependent on a very congested section of the A60 Mansfield Road between Leapool Island and Oxclose Lane.

#### Councils' Response

The site has been considered through the site selection process which concludes that the site is not being considered for allocation as a strategic site. Further consideration will be given as to whether part of the site is appropriate for allocation through the subsequent Local Plan.

The site adjoins the main urban area. The southern part of the site south of the ridgeline has planning permission for 148 homes. Additional development to the north would add traffic to the heavily congested A60 corridor. The extension to the north would encroach onto and go beyond the ridgeline north of Arnold into open countryside.

#### Changes Made

None.

#### **New Farm, Redhill (Formally Land to the west of the A60) (G05.1/G05.2PA)**

Trinity College promote New Farm for strategic residential led growth. The site accords with the proposed settlement hierarchy. Housing and employment growth in this location, with land for a park and ride, a primary school, a mixed-use centre, open space and GI would represent sustainable development. A reduced area is now promoted, addressing concerns around heritage and landscape. The site has a low Green Belt score. Development could help deliver a park and ride and a spine road to priorities bus use as well as GI benefits.

#### Councils' Response

The site has been considered through the site selection process which concludes that the site is not being considered for allocation as a strategic site. Further consideration will be given as to whether part of the site is appropriate for allocation through the subsequent Local Plan.

The site adjoins the main urban area, and the Green Belt is of relatively low value in this location. However, the site would add traffic to the heavily congested A60 corridor. Alternative means of transport in the form of a park and ride would be required in the vicinity of the A60 Leapool roundabout to encourage more sustainable modes of transport with routes through the development site and extensive improvements to existing junctions are likely to be required. The site is extensive and breaches the ridgeline north of Arnold encroaching into open



countryside. Significant adverse impacts on the landscape would result from development extending into countryside beyond the ridge line. Development in the vicinity of Bestwood Pumping Station would have a major impact on the setting of the Bestwood Pumping Station Grade II Listed Building and historic Registered Park and Garden.

In response to the representations submitted on the Preferred Approach, County Highways have commented that *'The surrounding road network is already heavily congested and any further traffic will not be acceptable for any safe movement of traffic in the area. Alternative means of transport in the form of a park and ride would need to be considered in the vicinity of the A60 Leapool roundabout to encourage more sustainable modes of transport with route/s through the development site to alleviate any further congestion on the A60 traffic corridor which cannot accept any further significant traffic impacts. Surrounding roads would also need to be assessed to ensure that they could accommodate any additional traffic. The site would require **a revised Transport Assessment and traffic modelling in support of any application to assess the traffic impacts in the area.** If the site is pursued then the development would need to have **multiple junctions** onto the highway network. Junctions would need to be designed to Nottinghamshire County Councils Highway Design Guide. Due to the scale of development, significant highway and transport infrastructure improvements would be required. Please note that there are two points of access from Queens Bower Road onto Bestwood Lodge Drive which is a cul de sac and due to the capacity of the existing residential estate roads in this area a max of 400 dwellings could be served from the south western boundary of the site but this should include any other committed developments and existing housing leading up to the site'.*

#### Changes Made

None.

#### North of Killisick Lane (part)

The landowner is promoting part of the North of Killisick Lane site which is allocated in the Local Planning Document for non-strategic development. It is noted that the land has already been removed from the Green Belt and a development brief proposes that the principle vehicular access into the wider H8 allocation is from Killisick Lane and the GBC land to the south-east of the site. Given that Gedling Borough Council has announced that it has scrapped plans to sell its land within the allocation, the client's land is still available for development and can be accessed from Strathmore Road. The capacity of the site is 55 dwellings at 23 dwellings per hectare.

#### Councils' Response

Noted. The site is already allocated in the Local Planning Document for non-strategic development. Gedling Borough Council agreed at Cabinet on 5<sup>th</sup> October 2023 to dispose of the land at Killisick Lane.

**Changes Made**

None.

## Preferred and Additional or Alternative Sites in Nottingham City

### *Preferred Sites*

#### **Boots - Nottingham**

Comments were received from the following:

Environment Agency (EA) and Nottingham Students' Partnership.

#### **Summarised Comments from statutory organisations**

The EA has supplied detailed consultation responses to ensure that the Boots site can be made viable. The EA have no further comment to make in addition to those already supplied under 14/00515/POUT and 14/02038/POUT and the subsequent requests for discharge of conditions.

#### **Summarised Comments from other organisations**

Nottingham Students' Partnership commented that care should be taken to ensure routes from the Boots site to University Park are maintained and allow for safe crossing of roads including University Boulevard. Some thought should be given to how students with various needs can be included in the mix of housing, to maximise their integration in the communities whilst minimising the risks of higher-density areas.

#### **Councils' Response**

The above comments are noted. As the site already has planning consent, any issues raised will already have been considered and addressed through the grant of planning permission.

#### **Changes Made**

None

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#### **Broad Marsh**

Comments on this site were received from the following:

Elton Garden Village Landowner Consortium, The Environment Agency, Lidl GB Ltd, National Highways, Natural England, Nottingham Local Access Forum and Global Mutual (on behalf of Victoria Centre Ltd).

In addition to the above stakeholders one local resident submitted representations on this site.

#### **Summarised Comments from statutory organisations**

The Environment Agency commented that the site lies primarily within flood zone 1 with a small section of the red line boundary located within flood zone 2. Any development proposed within FZ2 the LPA should apply National Flood Risk Standing Advice (NFRSA).

Natural England advised that a comprehensive approach to green infrastructure should be taken across the site, connecting the Green Heart of the proposed development with the wider green infrastructure network across the city. A long-term GI management and delivery Plan should be agreed and implemented.

National Highways advise that development at Broad Marsh is likely to have a low impact on the Strategic Road Network and is likely to be acceptable to National Highways.

### **Summarised Comments from developers**

One landowner commented that using their knowledge of the housing market, the numbers attributed to the Broad Marsh site between 2028/29 to 2032/33 seem inflated. Failure to gain Government funding as part of the Levelling Up Fund Initiative may have significant consequences on the delivery of the site. To take account of these funding issues, they would recommend that the trajectory is revised.

Another response highlighted that the strategy for housing in the plan area takes greater account of the 20-minute neighbourhood and ensuring that communities have access to facilities and amenities. As such, the 7 allocations (including Broad Marsh) should include reference to retail, and amenity uses.

Another landowner within the City Centre commented that it is crucial that all site allocations being brought forward should be the subject of appropriate transport assessments and parking surveys to ensure that they do not result in parking stress and harmful highways impacts.

### **Summarised Comments from other organisations**

Nottingham Local Access Forum commented that 'Other uses' should include 'routes for active travel'. The site encompasses the location of several historic routes and its permeability is important to access throughout the city centre.

### **Summarised Comments from local residents**

A local resident is concerned that the homes built at the Broad Marsh will be flats or student accommodation.

#### **Councils' Response**

National Highways comments are noted.

The redevelopment is likely to incorporate more green spaces than the previous development and be more permeable.

#### **Changes Made**

The trajectory for dwelling development has been put back.

## **Stanton Tip - Hempsill Vale**

Comments on this site were received from the following:

Environment Agency (EA), Flood Risk Management Officer at Nottingham City Council, National Highways, Nottingham Local Access Forum and Omnivale Ltd / Newsholme Developments.

### **Summarised Comments from statutory organisations**

Nottingham City Council commented that early engagement would need to be undertaken with the Flood Risk Management team due to complexities of draining this site, downstream impacts and consideration of existing watercourses and ditches on site which all feed into the River Leen.

The EA commented that the site lies fully within flood zone 1 therefore the EA have no fluvial flood risk concerns associated with the site. Given the previous use of the site there is a possibility that land contamination may be present. Policy RE7 point 3.183 of the Adopted Local Plan Part 2 requires that the development of the site provides suitable remediation of the land. The site is situated on a secondary aquifer and care needs to be taken to protect the groundwater resource. Given the previous use, future development will need to demonstrate that contamination risks will be adequately addressed through the course of the development.

National Highways advise that development at Stanton Tip is likely to have a medium impact on the Strategic Road Network and is likely to be acceptable to National Highways.

### **Summarised Comments from developers**

Omnivale Ltd / Newsholme Developments are part owners of the Stanton Tip (with the balance owned by Nottingham City Council). They fully supported the regeneration of Stanton Tip but do not wish to end up in a situation where the physical site characteristics and economic circumstances (including the approach to Homes England) confirm that the site is not viable for housing development, yet a reversion to employment-led development (for which the site is eminently suitable) would be considered as a policy departure. The respondents commented that the current strategic proposals for Stanton Park are for housing-led mixed development and includes 5-10 hectares for employment use. This element could however be significantly increased up to 25ha and identified as a strategic distribution site.

### **Summarised Comments from other organisations**

Nottingham Local Access Forum commented that 'Other uses' should include green infrastructure and open spaces, and routes for active travel. Re 'Transport'. The Forum welcomes the acknowledgement of existing informal rights of way, but these need to be accommodated in the planned development.

#### **Councils' Response**

Omnivale Ltd / Newsholme Developments have confirmed that they are in further negotiation with Homes England, who they believe may be able to assist meet the Council's aspirations of the development of housing on the site.

#### **Changes Made**

None
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### *Alternative or Additional Sites*

#### **Victoria Centre, Nottingham City Centre**

Victoria Centre Ltd commented that this site should be allocated within the Greater Nottingham Strategic Plan for a suitable mix of uses, including retail and complementary uses such as residential, employment, office, commercial, leisure and entertainment, to promote a diverse and vibrant City Centre, assist Nottingham City Council in meeting its total housing need and in accordance with national planning.

<b>Councils' Response</b>
Site wasn't a Growth Options site. Development is likely to be incremental unlike a total redevelopment of the Broad Marsh
<b>Changes Made</b>
None

#### **Former City College**

Keepmoat Homes consider that the Former City College, Carlton Road site is suitable and deliverable for residential development of circa 150 family homes for the following reasons and should be reassessed as part of the GNSP. The site whilst currently allocated as open space is largely not accessible to the public particularly the northern field due to the lack of public rights of way running through the site and it being fenced off to the north. The site is therefore underused and in particular the northern field does not form a recreational function to the wider community. There is potential for a cohesive masterplan to deliver family homes and other enhancements such as biodiversity and improved open space. The site is deliverable and under option to a developer and can be delivered early in the plan period to meet immediate need.

<b>Councils' Response</b>
Site wasn't a Growth Options site. It is not considered strategic based on the number of dwellings.
<b>Changes Made</b>
None

#### **North Ruddington**

The site is being promoted for 500 dwellings. The northern area of this site is within Nottingham City; however, the majority is within Rushcliffe. See summary of comments within Additional or Alternative Sites in Rushcliffe.

**Councils' Response**

The site is strategic in scale and located adjacent to Ruddington, which is identified as a Key Settlement the GNSP Preferred Approach. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites in Rushcliffe. The part which lies in the City is not of a strategic scale, and development is not feasible separately from the part lying within Rushcliffe Borough. The site is located within Green Belt in a sensitive location preventing coalescence of the principal urban area and Ruddington. The site is in the Open Space Network and a SSSI and LWS abuts the site and is neither deliverable nor developable at present.

**Changes Made**

None.

## **Preferred and Additional or Alternative Sites in Rushcliffe**

### *Preferred Sites*

#### **Former RAF Newton (R02.2PA)**

Comments on this site were received from the following:

Ceylon Tea Growers Association, Environment Agency, Harworth Group, National Highways, Newton Nottingham LLP, Elton Garden Village Landowner Consortium. Harworth Group and Lidl GB Ltd.

In addition to the above stakeholders one local residents submitted representations on this site.

#### **Summarised comments from statutory organisations**

The Environment Agency has no comments to make as it provided extensive comments at outline application stage.

National Highways has assessed the site as having a Medium potential impact on the Strategic Route Network.

#### **Summarised comments from developers**

Three developers noted that the site is allocated in the Rushcliffe Local Plan Part 1: Core Strategy in 2014 and the approach to include it in the CS Review is not 'pro-growth'. It would be more appropriate to include this development as a committed development to allow other strategic sites to be considered.

Newton Nottingham LLP supports the retention of the allocation and has made representations to expand the allocation to the west. The Green Belt boundary at RAF Newton should be reviewed to allow for future expansion of the allocation. The size of the allocation does not support the delivery of other uses and is reason to consider an expansion of the site to the west. Please note a reserved matters application has been submitted for commercial space.

#### **Summarised comments from other organisations**

A major retailer proposed that the allocation include a reference to retail, and amenity uses to ensure they are consistent with the Plan's vision of the 20-minute neighbourhood.

#### **Summarised comments from local residents**

Comments from one local resident highlighted: pressure on local services in Radcliffe-on-Trent and Bingham, especially secondary schools, where sites at Toothill and Radcliffe-on-Trent are already cramped with no possibility for expansion without building on school sports fields; the impacts on limited parking in Bingham and Radcliffe-on-Trent as people are unlikely to make trips by foot or cycle; and that it is unlikely that the developer would use local builders.



### **Councils' Response**

As the site already has planning consent and is under construction, many of the issues raised have already been considered and addressed through the grant of planning permission.

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication draft of the GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for any of the allocations to be enlarged. In this case it would require land to be released from the Green Belt and exceptional circumstances do not exist to justify this.

It is necessary to carry the strategic allocation forward from the previous local plan as its delivery is still ongoing and could be the subject of further planning applications.

### **Changes Made**

The site's policy is carried forward from the Rushcliffe Local Plan Part 1: Core Strategy without any substantive changes.

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### **North of Bingham (R03.3PA)**

Comments on this site were received from the following:

Elton Garden Village Landowner Consortium, Environment Agency, National Highways and Harworth Group.

In addition to the above stakeholders three local residents submitted representations on this site.

### **Summarised comments from statutory organisations**

The Environment Agency have supplied extensive comments on this site and have no further comments to make.

National Highways has assessed the site as having a high potential impact on the Strategic Route Network.

### **Summarised comments from developers**

Developers highlighted that the site was allocated in the Rushcliffe Local Plan Part 1: Core Strategy in 2014 and the approach to include it in the CS Review is not 'pro-growth'. It would be more appropriate to include this development as a committed development to allow other strategic sites to be considered.

### **Summarised comments from local residents**

Comments from local residents opposed further development of the site, due to the increased traffic that would occur and the limited parking within Bingham. This is compounded by the absence in improvements to public transport, active travel options in the town.

Environmental concerns were raised, notably the loss of agricultural land. Laos that the country park and lake had not yet been delivered.

There were a number of comments regarding the impacts on character and that the development so far is over crammed, could be anywhere and that further development undermines the market town character.

Concerns were also raised regarding pressure on local services in Bingham, especially health services and the secondary schools.

Finally, that it is unlikely that the developer would use local builders.

#### **Councils' Response**

As the site already has planning consent and is under construction, many of the issues raised have already been considered and addressed through the grant of planning permission. It is necessary to carry the strategic allocation forward from Rushcliffe Local Plan Part 1: Core Strategy as its delivery is still ongoing and could be the subject of further planning applications.

#### **Changes Made**

The site's policy is carried forward from the Rushcliffe Local Plan Part 1: Core Strategy without any substantive changes.

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#### **Cotgrave Colliery (R08.5PA)**

Comments on this site were received from the following:

Environment Agency, National Highways, Elton Garden Village Landowner Consortium and Lidl GB Ltd.

In addition to the above stakeholders one local residents submitted representations on this site.

#### **Summarised comments from statutory organisations**

The Environment Agency has no comments to make as it provided extensive comments at outline application stage.

National Highways assessed the site as having a Low potential impact on the Strategic Route Network and likely to be acceptable to National Highways.

#### **Summarised comments from developers**

Elton Garden Village Landowner Consortium: It is noted that the site was allocated as part of the Rushcliffe Part 1 Local Plan, which was adopted in 2014.

#### **Summarised comments from other organisations**

Lidl GB Ltd proposes that the allocation include a reference to retail, and amenity uses to ensure they are consistent with the Plan's vision of the 20-minute neighbourhood.

#### **Summarised comments from local residents**

The site needs to be connected to Cotgrave precinct via a proper cycle path.

#### **Councils' Response**

The above comments are noted. The site already has planning consent and is substantially built out, with all residential development completed.

It is appropriate to carry the site forward as a strategic allocation from the Rushcliffe Local Plan Part 1: Core Strategy. While residential development on the site has been completed, delivery of part of the employment land remains outstanding.

#### **Changes Made**

The site's policy is carried forward from the previous plan except for those elements of the policy relating solely to the delivery of residential, which are now superfluous and need not be repeated.

### **Melton Road, Edwalton (R10.5PA)**

Comments on this site were received from the following:

Environment Agency, National Highways, Harworth Group, British Horse Society, Ceylon Tea Growers Association and Elton Garden Village Landowner Consortium

#### **Summarised comments from statutory organisations**

The Environment Agency has no comment to make on this site.

National Highways has assessed the site as having a medium potential impact on the strategic route network.

#### **Summarised comments from developers**

Three developers/landowners stated that the site was allocated in the Rushcliffe Local Plan and the approach to include it in the CS Review is not 'pro-growth'. It would be more appropriate to include this development as a committed development to allow other strategic sites to be considered.

#### **Summarised comments from other organisations**

The British Horse Society has concerns that the PROW BR2 is directly impacted by the development. The Active Travel Partnership (Ramblers, British Horse Society, cycle and inclusion groups) notes that equestrians are not included in the 'Transport' section of the site information. Equestrians should be included in all active travel routes and a Walking, Cycling, Horse-riding Assessment and Review (WCHAR) should be carried out on all trunk roads.

#### **Councils' Response**

The above comments are noted. As the site already has planning consent for most parts of the site and is under construction, many of the issues raised have already been considered and addressed through the grant of planning permission.

It is necessary to carry the strategic allocation forward from the Rushcliffe Local Plan Part 1: Core Strategy as its delivery is still ongoing and could be the subject of further planning applications.

### **Changes Made**

The site's policy is carried forward from the Rushcliffe Local Plan Part 1: Core Strategy but with changes to it to reflect latest circumstances. This includes that housing delivery will be for around 1,800 homes in order to reflect how many homes have been built to date and those planning permission still to be delivered.

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## **East of Gamston/North of Tollerton (R11.5PA)**

Comments on this site were received from the following:

Barratt David Wilson Homes, Canal and River Trust, DAQS Ltd, Elton Garden Village landowner consortium, Environment Agency, Grantham Canal Society, Harworth Group, Lidl GB Ltd, Radcliffe on Trent Residents' Association, Sport England and National Highways.

In addition to the above stakeholders nineteen local residents submitted representations on this site.

### **Summarised comments from statutory organisations**

The Environment Agency had no concerns regarding fluvial flood risk. They advised that future development would need to demonstrate that contamination risks will be adequately addressed through the course of the development. Guidance on managing risks from land contamination can be found at [Land contamination risk management \(LCRM\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/land-contamination-risk-management-lcrm).

National Highways confirmed their acceptance of the principle of the allocation. They reaffirmed that any scheme coming forward would be required to provide highways infrastructure and developer contributions to the A52 Nottingham junctions.

### **Summarised comments from developers**

A majority of developers noted that there have been delays to the delivery of this site since its allocation in the Local Plan Part 1, with the availability and deliverability of the site being questioned. The developers noted that no dwellings have been built, and no planning permission has been granted either. It was noted that an outline planning permission has been submitted on part of the site. Yet concerns were raised due to the inability of the landowners to collaborate on a comprehensive application for the entire site, the lack of a political appetite for the application until a comprehensive masterplan is approved for the entire allocation, and that there is no indication of a decision being reached since the applications validation two years ago, given the outstanding objection from National Highways. DAQS Ltd were specifically concerned with the inadequate infrastructure in the area, particularly at Wheatcroft roundabout and the poor planning for pedestrian/cycle routes through Tollerton and crossing the A52.

It was suggested by Barratt David Wilson Homes and Harworth Group that the site could be safeguarded for future development within the Strategic Plan so that it can

come forward when and if it is deliverable. The Elton Garden Village landowner consortium stated that the site should not be allocated within the Strategic Plan and should be replaced by more suitable and deliverable alternative sites until the challenges facing the site have been overcome.

Lidl GB Ltd suggested that to be consistent with the Strategic Plan's vision of a 20-minute neighbourhood, the allocation should reference retail and amenity uses.

### **Summarised comments from other organisations**

The Canal and River Trust own and maintain the Grantham Canal that adjoins the northern boundary of the allocation and requested that the allocation does not adversely affect the future restoration of the canal. They noted the canal's designation as a Local Wildlife Site and stated that the creation of a green corridor along the canal would support the value of the canal as a wildlife habitat. They stated that the canal towpath has the potential to provide a leisure and recreational resource for future residents as well as an active travel link to Cotgrave and Gamston.

The Grantham Canal Society and the Radcliffe on Trent Residents' Association suggested that the Grantham Canal is referred to as a blue-green corridor to recognise the water element of the Canal. They both referenced the benefit that improvements to the canal would have to wildlife and the public's health and wellbeing.

Sport England provided their comments that they had submitted to the outline application that covers part of the site. They currently do not support the development as there remains a number of unanswered questions regarding the design, quantity, type and location of the onsite provision for sport and more generally connectivity.

### **Summarised comments from local residents**

A majority of comments from local residents discussed the Grantham Canal, with many requesting that the canal is referred to as a blue-green corridor to recognise the water element. It was suggested that the canal was connected back to the national canal network. One comment specifically requested restoring the canal up to the River Trent, and one comment specifically requested restoring the canal under Gamston Lings Bar Road. One comment was disappointed that the Strategic Plan did not include investment into re-watering the canal. It was suggested that a Section 106 agreement is used to require the developers of the site to restore the section of the canal running alongside the land to a useable state.

Multiple comments discussed the benefits restoring the canal could have, including increasing tourism to the area, improving the recreational offerings such as paddle boarding, improving the wellbeing of the local residents and enhancing the canal as a wildlife habitat.

A few comments opposed the allocation of the site. It was raised that currently the site is good agricultural land, supports a variety of wildlife, and currently provides an emergency refuel station for helicopters. One comment suggested that the allocation of the site would enable the creation of a single West Bridgford-Edwalton-Tollerton suburban sprawl.

Four comments criticised the infrastructure provision, stating that there is not suitable provision for cycling and walking. Suggestions included the need for off road access to West Bridgford, traffic calming measures in Gamston and the need to connect the canal to both sides of the A52, possibly via a new footbridge or tunnel.

### **Councils' Response**

Since the site was allocated for mixed use development within the Rushcliffe Local Plan Part 1: Core Strategy in 2014, its delivery has been significantly delayed. This, principally, has been due to a lack of agreement or collective endeavour between the various landowners in bringing development forward. However, more recently, progress has been much more positive and there is confidence now that delivery on site can start over the next few years without any further significant delays.

The Council is currently preparing a site-wide masterplan and development framework for the site, which it expects to adopt as a Supplementary Planning Document (SPD) within the next 12 months. The SPD will shape and support site delivery, including the provision of on and off-site infrastructure, and establish a framework to enable separate planning permissions to be approved for different parts of the site.

There are currently two major applications, which have been submitted to Borough Council for determination, covering around 80% of the strategic allocation's overall site area. It is expected that each will be determined once the SPD has been adopted.

The latest expectations in respect of site delivery are considered realistic based on current circumstances. As it is, no allowance is made for the first homes to be delivered on site until 2028/29. Thereafter, it is expected that the site will make a sizeable contribution to overall housing delivery on an annual basis.

Many of the detailed points made in the comments to the GNSP's preferred approach are being considered and addressed as part of the SPD's preparation.

### **Changes Made**

The site's policy is carried forward from the Rushcliffe Local Plan Part 1: Core Strategy but with some changes to the site-specific policy to reflect latest circumstances. It is proposed the site will accommodate around 4,000 homes.

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### **South of Clifton (R15.5PA)**

Comments on this site were received from the following:

Barratt David Wilson, Ceylon Tea Growers Association, Crown Estate, Elton Garden Village Landowner Consortium, Environment Agency, National Highways, Oxalis and Lidl GB Limited.

### **Summarised comments from statutory organisations**

The Environment Agency have no further comment to make on this application in addition to those supplied on the outline application.

National Highways has no objection as the site already has planning consent.

### **Summarised comments from developers**

One response considered that the projection of 250 dwellings being completed per annum from 2025 is unrealistic based upon the position in relation to the amount of detailed planning applications in the planning process at the moment, and that the forward delivery rates do not appear to account for the fact that detail planning permission has not yet been granted for over 80% of the total allocation in terms of housing.

Four responses from developers and landowners stated that based upon Lichfield's 'Start to Finish' Report (February 2020), the full 3,000 dwellings expected from the site will not be delivered in the plan period. In addition, one response stated that high design code standards will also hamper delivery.

One planning consultant disagreed with the Green Belt Review in respect of area FAR/A compared to the results of the previous green belt review.

Lidl GB Limited consider that given the 20-minute neighbourhood concept, reference to retail should be made within the South of Clifton strategic allocation (R15.5PA).

### **Councils' Response**

As the site already has planning consent and is under construction. It is necessary to carry the strategic allocation forward from Rushcliffe Local Plan Part 1: Core Strategy as its delivery is still ongoing and could be the subject of further planning applications.

The site has made considerable progress since planning permission was granted in 2019, with substantial parts of the site now under construction. The delivery of an average of 250 dwellings per annum is considered realistic for a site with multiple points of access across the site and multiple developers involved in delivering the site.

### **Changes Made**

The site's policy is carried forward from the Rushcliffe Local Plan Part 1: Core Strategy without any substantive changes.

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### **Ratcliffe on Soar Power Station (RBC-EMP-01)**

Comments on this site were received from the following:

Barton in Fabis Parish Council, Gotham Parish Council, Kingston on Soar Parish Council, Ratcliffe on Soar Parish Council, Thrumpton Parish Meetings, Historic England, Environment Agency, Natural England, Nottinghamshire County Council, British Gypsum and Hallam Land Management.



Comments were received from two RBC Council members for Gotham and Sutton Bonington.

In addition to the above stakeholders two local residents submitted representations on this site.

### **Summarised comments from statutory organisations**

Historic England have no objections to the proposed Local Development Order at the Power Station. They stated that the redevelopment will involve changes to the setting of designated heritage assets from the loss of the existing power station (a prominent landmark) and the construction of new structures. They confirmed that impacts will need to be addressed as part of any future planning application.

The Environment Agency have no objections to the proposed Local Development Order at the Power Station. They have provided comments, as part of their formal response to the consultation of the Order, which recommended conditions related to Groundwater & Contaminated Land, Biodiversity, Fisheries & Geomorphology and Water Quality and provided advisory comments related to Flood Risk and Regulated Industry.

Natural England have stated that blue and green infrastructure should be integral to the development at the Power Station. They recommended that opportunities to make green connections to the Trent Valley should be taken by enhancing and creating natural habitats and improve accessibility.

### **Summarised comments from developers**

One response from the development industry was supportive of the redevelopment of the Power Station. The site promoter, in this instance, requested that the next version of the Strategic Plan include a site allocation boundary which confirms the sites removal from the Green Belt.

British Gypsum stated that whilst they were not initially consulted on the Local Development Order, they have now been involved. They consider that the safeguarded mineral could be extracted, and the Local Development Order implemented to the benefit of all parties. They stated that appropriate remediation of the site could offer substantial benefits to the Ratcliffe-on-Soar Local Development Order.

### **Summarised comments from other organisations**

Two RBC Councillors, Gotham Parish Council, Kingston on Soar Parish Council, Ratcliffe on Soar Parish Council and Thrumpton Parish Meetings were supportive of the redevelopment of the Power Station as an international centre for the development of zero carbon technology. They requested that a condition be imposed so the site cannot be used for general industrial uses, which would undermine the employment objectives of the Strategic Plan. They stated that in order to demonstrate the exceptional circumstances needed to remove the Power Station from the Green Belt, the site must be used in a way that significantly assesses the climate emergency.

In terms of the Green Belt, they stated that there is a significant difference between land north and south of the Power Station. Land to the north is previously development land, land to the south is not. They therefore advised that the site be



treated as two distinct areas, with tighter land and design controls for development to the south.

The RBC councillor for Sutton Bonington was supportive of the above comments. They also recommended the inclusion of Winking Hill Farm within the Freeport/Local Development Order development as it would enable a more appropriate access to the land south of the A453, as well as the intolerable impacts to the residents of the farm. They also requested that development on the entire Winking Hill Farm site should be allowed only if RBC-EMP-01 is developed.

Nottinghamshire County Council requested that the Strategic Plan and its allocation of the Power Station takes full account of mineral safeguarding issues. They also requested that the Strategic Plan requires the development of a local heat network to serve the Power Station, using waste heat that will be generated from the EMERGE energy from waste plant (which benefits from full planning permission).

### **Summarised comments from local residents**

One local resident requested that Winking Hill Farm is included as part of the proposed Local Development Order for the Power Station. They stated that, as currently proposed, the farm is to have buildings (up to 40m high) on 3 sides and a proposed battery development on the remaining side. They commented that this is unacceptable and that it is ridiculous that the farm has not been included in the Local Development Order site area.

The other local resident requested that a Local Cycling and Walking Infrastructure Plan is created for safe cycle routes between the Power Station and settlements within a 5-mile radius of the site. They specifically requested a cycle/foot bridge across the River Trent (near Red Hill & Cranfleet Farm).

#### **Councils' Response**

The site already has planning consent following approval of the Ratcliffe on Soar Local Development Order (LDO) in July 2023. Many of the issues raised have already been considered and addressed through the grant of planning permission.

It is appropriate, following approval of the LDO, for the site to now be allocated within the GNSP for employment, including an element of potential strategic distribution and for the land to be removed from the Green Belt. The proposed approach to employment and strategic distribution within Rushcliffe, and this site specifically, is outlined in the Publication GNSP and Employment Background Paper.

No further land is required to support delivery of the Power Station's redevelopment and, due to this, further Green Belt release cannot be justified.

#### **Changes Made**

The site's proposed allocation for employment, with an element of potential strategic distribution, was outlined at the Preferred Approach stage. This is still considered a valid approach. A suitably worded policy is included in the GNSP to support the delivery of appropriate mix of employment uses on site and levels of

development overall. The site's allocation and policy within the GNSP accords with the approved LDO.

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### *Additional or Alternative Sites*

#### **Land north of Abbey Lane, Aslockton**

The site is being promoted by Davidsons Developments and Avant Homes for residential development delivering a proportionate village extension outside of the Green Belt that would help meet local housing needs. The proposed development would provide the opportunity for younger residents (and older people wishing to downsize) with links to the village to access local housing and will help to maintain a balanced community.

There are no environmental constraints, and the site would be designed to conserve the setting of the Conservation Area. The site is well served by existing infrastructure and services.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

#### **Changes Made**

None.

#### **Bingham North and East (R03.1PA)**

The Crown Estate believes that the preferred approach should identify this site as either a preferred location or a reserve site as: it is the only location identified in the Growth Options Study as suitable, which is outside of the Green Belt; Bingham is a key rural services centre, avoiding longer trips to Nottingham; it is within a Multi-modal transport corridor: A46; A52; Nottingham-Grantham railway line; bus network; it is in single ownership of the Crown Estate; it would reduce reliance on windfall sites; is consistent with 20-minute neighbourhood approach; and site is available, suitable, and achievable.

Para. 5.7 of the Plan wrongly states that no such opportunities exist to meet growth needs outside the Green Belt, an error that should be addressed by considering Bingham as a growth location or for allocation.

The Crown Estate submitted two concept plans in 2019: Option 1 – 800 homes; and Options 2a 2b – 2,500-2,700 new homes. These options need to be assessed as reasonable alternatives in the Sustainability Appraisal.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is

proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

#### **Changes Made**

None.

### **Land north of Bunny C of E Primary School, Bunny**

The site is being promoted for 50 dwellings by Metacre, including the provision of affordable housing, or an 100% affordable housing scheme. Metacre suggested that the development of the site could provide the opportunity for the expansion of the existing school and provide a drop off/set down area for the school. They also suggested that it could provide an opportunity for a community parking area to serve the nearby Church and Village Hall.

Metacre stated that the site is located within the Green Belt, adjoins the Conservation Area and is located near designated heritage assets. They stated that the site is not at risk from fluvial flooding, and there are no statutory or non-statutory wildlife sites within or adjoining the site.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. Moreover, the site is not strategic in scale and would require Green Belt land release when the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Hollygate, Cotgrave**

Cora considered that, based on representations made to the overall strategy, technical reviews and its vision for the site, that its land at Hollygate Lane, Cotgrave is suitable for development for up to 80 new homes

The identification of Cotgrave as a key settlement is supported and thus the site should be allocated.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### Changes Made

None.

### Colston Gate, Cotgrave

Parker Strategic Land considered that, based on representations made to the overall strategy, technical reviews and its vision for the site, that its land at Colston Gate, Cotgrave is suitable for development.

The identification of Cotgrave as a key settlement is supported and thus the site should be allocated.

### Councils' Response

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### Changes Made

None.

### Land west of Cotgrave

IM Land considered that, based on representations made to the overall strategy, technical reviews and its vision for the site, that its land to the west of Cotgrave is suitable for development.

The identification of Cotgrave as a key settlement is supported and thus the site should be allocated.

### Councils' Response

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### Changes Made

None.

### Owthorpe Road, Cotgrave

CEG Land Promotions (UK) Ltd stated that given the lack of provision for strategic distribution across the plan area, there should be allocations provided for such uses. They consider that this site is of a size to contain strategic distribution uses and is in an appropriate location on the strategic road network with an access to markets.

### **Councils' Response**

The proposed approach to employment and strategic distribution within Rushcliffe is outlined in the Publication GNSP and Employment Background Paper. The employment elements of all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP and the Ratcliffe on Soar Power Station site should be allocated for employment development, including strategic distribution. There is no further requirement for the allocation of any new strategic distribution sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### **Changes Made**

None.

### **Land at Cropwell Bishop**

The site is being promoted by Samworth Farms Ltd for 450-650 dwellings and 47 hectares of employment land to the west of Cropwell Bishop. The site is adjacent to the A46, providing easy access to the strategic highway network. Samworth Farms Limited stated that the site is suitable for release from the Green Belt, particularly as there is already significant development east of the A46 which urbanises the area. They identified no other constraints to development.

### **Councils' Response**

In terms of the residential element on the proposal, the proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

In respect of new employment development, the proposed approach to employment and strategic distribution within Rushcliffe is outlined in the Publication GNSP and Employment Background Paper. The employment elements of all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP and the Ratcliffe on Soar Power Station site should be allocated for employment development, including strategic distribution. There is no further requirement for the allocation of any new strategic distribution sites.

The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### **Changes Made**

None.

### **Land north of Memorial Hall, Cropwell Bishop**

The site is being promoted by Davidsons Developments Ltd for the development of 115 dwellings. The site was previously identified as a possible housing allocation

within the Rushcliffe Local Plan Part 2 but was not taken forward as part of the adopted Local Plan Part 2.

The site is located within the Green Belt, but Davidsons Developments Ltd concluded that the development of the site would not have significant harm in respect of the five purposes of the Green Belt. They stated that there are no other significant environmental constraints to the site.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

#### **Land North of Butt Lane, East Bridgford (R01.1PA)**

The Stagfield Group commented that the site is a logical addition to the existing allocations in the Rushcliffe Local Plan Part 2 at East Bridgford. Alternatively, a smaller site at this location would be a suitable allocation or a reserve site in a review of Rushcliffe Local Plan Part 2.

Furthermore, a Green Belt Review is required to enable Nottingham City to meet its need and the 35% uplift – would provide exceptional circumstances for the release of land from the Green Belt. Logical to extend the village to the east as far as the A46 and the existing Green Belt boundary.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

#### **Stonebridge Drive, East Leake**

Gladman Developments promotes its site off Stonebridge Drive based upon representations to overall strategy. East Leake is a key settlement suitable for further growth and there are no known constraints to the site's development.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

#### **Changes Made**

None.

### **West Leake Road, East Leake**

Bloor Homes is promoting a site off West Leake Road for around 500 dwellings. It considers that the site is close to a range of facilities and is deliverable.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

#### **Changes Made**

None.

### **South of Rempstone Road, East Leake**

David Wilson Homes is promoting Land South of Rempstone Road for around 500 dwellings. In its submission, it states that the majority of the site is within 1.25km of the village centre and that there are no constraints to development that cannot be overcome. In addition, it disagrees with the conclusion of the Borough Council's SHLAA the site would have a detrimental impact on the ridgeline is defined in the East Leake Neighbourhood Plan. It does not agree that the ridgeline in the neighbourhood plan is correct and has provided a landscape analysis in support of its argument.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

#### **Changes Made**

None.

### **Land between Elton and Orston ("Elton Garden Village")**

The site is being promoted by the Elton Garden Village landowner consortium for a new mixed-use settlement which would include 3,000 dwellings. Elton Garden



Village landowner consortium suggested that the site could make a significant long-term contribution to Greater Nottingham's housing need.

The site lies outside of the Green Belt. The developable area is located within flood zone 1. The landowner consortium stated that future master planning will ensure that biodiversity enhancements and ecological mitigation are made to the landscape, respecting the Local Wildlife Site (LWS), adjacent SSSI site, trees and hedgerows. Master planning will also ensure that an appropriate buffer is kept in order to maintain the separation of Elton and Orston.

Elton and Orston railway station is located centrally within the site, running from east to west, and Station Road runs from north to south. The landowner consortium suggested that the presence of the rail station would help to support a new sustainable development in this location and allow the concept of a walkable neighbourhood to take form.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

#### **Changes Made**

None.

#### **Land north-east of Gamston**

The site is located to the north of the Gamston/Tollerton Sustainable Urban Extension and is being promoted for residential development by Taylor Wimpey and Barwood Land. The site is located within the Green Belt, but Taylor Wimpey stated that the site does not perform the purposes of the Green Belt. They therefore believe the site is in a suitable location to accommodate growth.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. It is already the case that the adjacent existing strategic allocation will take well beyond the plan period to be fully completed, even without taking in any additional land. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.



### **Land south-east of Gamston**

The site is being promoted for residential development by Davidsons Developments Ltd. Alternatively, Davidsons Developments Ltd have suggested that the site could be identified as a reserve site or safeguarded for development beyond the Strategic Plan period.

Davidsons Developments Ltd have stated that they have an agreement in place with the landowner, enabling the land to come forward quickly, which could help facilitate the delivery of the Sustainable Urban Extension. They have also confirmed that their land has road frontage with the A52 and could provide one of the two junctions onto the A52 that is required to deliver the Sustainable Urban Extension.

Davidsons Developments Ltd stated that the site would adjoin the proposed Sustainable Urban Extension which has been removed from the Green Belt, and the design of the scheme would include a significant buffer between the site and West Bridgford and Tollerton to prevent coalescence. Apart from this, Davidsons Developments Ltd did not identify any other significant constraints to development.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. It is already the case that the adjacent existing strategic allocation will take well beyond the plan period to be fully completed, even without taking in any additional land. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Land off Gypsum Way, Gotham**

Davidsons Developments is promoting a site to the south of its existing allocation off Gypsum Way. It considers that the site can be accessed through the allocated site, that there are no constraints to development and that the site is in a sustainable location benefiting from services and facilities.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Nicker Hill, Keyworth**

CEG Land Promotions (UK) Ltd submitted this additional site, highlighting: its location adjacent to an existing Local Plan allocation and a logical extension; its capacity for 200-250 dwellings and open space; is deliverable within 5 years - suitable, available and achievable; would address deprivation issues since colliery closure; is within good commuting location for Nottingham; has a good range local services; the site has a low-medium importance for Green Belt; is well-enclosed by Stanton-on-the-Wolds golf course to the east; and the land to the north-east is also controlled by GEC and together could form a strategic allocation.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Land East of Willow Brook, Keyworth**

Mather Jamie promoted this site, noting the site would provide sustainable housing growth of c.45 dwellings at Keyworth requiring release of Green Belt land identified as of low/medium importance in the Council's Green Belt review.

Any potential coalescence with Stanton-on-Wolds could be addressed through sensitive design.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **'New Kingston'**

The site is being promoted by Hallam Land Management Limited for a new mixed-use settlement which would include 6,000 dwellings. The site is located adjacent Ratcliffe on Soar Power Station, which is earmarked for significant employment development, as well as East Midlands Parkway, which is included as part of the HS2 route. Hallam Land Management Limited suggested that the site provides an

opportunity for the Strategic Plan to safeguard land or highlight a Direction for Growth for a new settlement which would complement the proposed economic growth in the area.

The site lies within the Green Belt. Hallam Land Management Limited believe that given Ratcliffe on Soar Power Station is to be removed from the Green Belt, removing New Kingston from the Green Belt would allow for the creation of a new defensible Green Belt boundary using the West Leake Hills as a recognisable physical feature. The developable area of the site would be located within flood zone 1, and Hallam Land Management Limited stated that sensitive master planning would seek to protect existing landscape features and wildlife sites.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

In respect of new employment development, the proposed approach to employment and strategic distribution within Rushcliffe is outlined in the Publication GNSP and Employment Background Paper. The employment elements of all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP and the Ratcliffe on Soar Power Station site should be allocated for employment development, including strategic distribution. There is no further requirement for the allocation of any new strategic distribution sites.

The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Land at Owlthorpe Lane, Kinoulton**

The site is being promoted by Mather Jamie who highlighted that the site consists of several agricultural field parcels and allotment gardens. It would provide sustainable housing growth and could be offered as an urban extension on the north-eastern edge of the village of Kinoulton.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

#### **Changes Made**

None.

### **Former RAF Newton**

The Ministry of Defence promoted its landholding west of former RAF Newton. It considers that development could be expanded to include areas to the west, north and south which could potentially provide up to 25 ha of additional employment land, an additional 3,000 dwellings, together with open space and green infrastructure. Its co-dependent relationship with Bingham means there is an opportunity to create a critical mass of over 5,000 new dwellings around 60 ha of additional employment land in this broad strategic location which is in close proximity to the A52 and A46. This would reduce pressure on higher value Green Belt locations and enable the delivery of infrastructure improvements, including transport and environmental improvements.

Newton Nottingham LLP considers that an expanded allocation would enable the delivery of other uses to create a sustainable settlement. The size of the overall development at Newton thus far has compromised the ability to deliver certain uses on site. This is on account of the quantum of residential and, as such the population yield, being insufficient to support infrastructure.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

In respect of any new employment development, the proposed approach to employment and strategic distribution within Rushcliffe is outlined in the Publication GNSP and Employment Background Paper. The employment elements of all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP and the Ratcliffe on Soar Power Station site should be allocated for employment development, including strategic distribution. There is no further requirement for the allocation of any new strategic distribution sites.

The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Land at Radcliffe on Trent**

The site is being promoted by Samworth Farms Ltd for 700 dwellings as an eastern extension to Radcliffe on Trent. The site was previously assessed as having a high potential for strategic growth in the Greater Nottingham Growth Options Study. The site is located within the Green Belt but has previously been assessed as suitable for release from the Green Belt.

The site is located adjacent to the railway and the A52. Samworth Farms Ltd stated that recent applications have demonstrated how new development can mitigate adverse impacts. Samworth Farms Ltd stated that the development of the site will

have no adverse impacts on the Upper Saxondale conservation area and has less of an impact to Upper Saxondale compared to other sites, particularly with regards to coalescence.

Samworth Farms Ltd stated willingness to explore connectivity over the train line as part of any development proposals. They suggested development proposals could assist in funding a footbridge over the railway line or upgrading the existing vehicular connection over the railway line, which is under their control.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **East of Ruddington**

The site is being promoted by JG Woodhouse & Sons and Hickling for a mixed-use development including 2,000 dwellings, creating a self-sufficient community. JG Woodhouse & Sons and Hickling have proposed that the site could provide an opportunity to extend the Ruddington Fields Business Park and expand Rushcliffe Country Park across the A60.

The site is located within the Green Belt, but JG Woodhouse & Sons and Hickling advised that the site does not have any other significant constraints.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Land south of Flawforth Lane, Ruddington**

The site is being promoted for 400-500 dwellings. Barwood Development Securities Ltd stated that the site is largely unconstrained, can achieve a suitable access, and is located within walking distance of facilities and services.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Land at North Road, Ruddington**

The site is being promoted for 250 dwellings, including provision for affordable housing. Andrew Granger and Co stated that the site lies within the Green Belt, but otherwise remains unconstrained. They stated that the site is in a sustainable location with good access to a variety of local services and employment opportunities within Ruddington.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **North Ruddington**

The site is being promoted for 500 dwellings. William Davis stated that the site is in a sustainable location with good accessibility. The developable area of the site is located within flood zone 1. William Davis suggested that the Fairham Brook on the western boundary and the Packman Dyke beyond the southern boundary would be incorporated into the design of the site to enhance the blue infrastructure network.

The site is located within the Green Belt. William Davis stated that the design approach will result in permanent robust and long-term Green Belt boundaries being created. Considered design could minimise the perception of encroachment with West Bridgford and Clifton.

#### **Councils' Response**

In relation to that part of the site within Rushcliffe, the proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should



be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Land west of Pasture Lane, Ruddington**

The site is being promoted for residential development. The site is located within the Green Belt, but Taylor Wimpey stated that the site does not perform the purposes of the Green Belt. They therefore consider the site appropriate for development in a logical location where appropriate master planning could provide a permanent buffer to maintain the separation between Ruddington and Nottingham City.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Jerico Farm, East of Stanton-on-the-Wolds**

Herrick and Mattock promoted this site during the consultation period. They highlight the opportunity for a strategic B8 and residential site of 75 hectares, with a local centre and primary school. It is in a good location on the highway network – enclosed by A606 and traversed by A46 east of Stanton-on-the-Wolds, with existing access onto the A46. Should be assessed as a reasonable alternative in the Sustainability Appraisal. It can utilise strong Green Belt boundaries.

Exceptional circumstances for Green Belt release - the significant shortfall in the availability of strategic land for logistics and distribution within Greater Nottingham and the high levels of market demand for sites of this scale.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### Changes Made

None.

### Land north-west of 130 Melton Road, Stanton-on-the-Wolds

The site promoter (Mr Wilson) has been promoting this site through the SHLAA, highlighting that this is infill land too small for agricultural production, which has been unused for over 50 years. As per the Government's provision within the National Planning Policy Framework, this and similar sites should be granted planning permission up to the SHLAA-assessed dwelling capacity.

### Councils' Response

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

### Changes Made

None.

### Land south of Landcroft Lane, Sutton Bonington

The site is being promoted by Mather Jamie as a small-scale extension to Sutton Bonington which meets local housing needs. Mather Jamie did not identify any significant constraints to development. They stated that the site is well served by existing services and facilities proportionate with the scale of Sutton Bonington.

### Councils' Response

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

### Changes Made

None.

### Land east of Tollerton Lane, Tollerton

The Harworth Group is the promoter of land east of Tollerton Lane which is identified as site reference R11.2PA with a capacity of 475 dwellings in the evidence base. It considers that a full and comprehensive Green Belt review should take place with consideration of the inability for Nottingham City to meet its own housing need and the 35% uplift as required by the Government using the Standard Method. Further strategic sites should be allocated such as this one or at the very least a minimum number of dwellings should be distributed to specifically identified sustainable settlements, particularly within Rushcliffe that have capacity to accommodate growth. Any such minimum provisions could then be distributed to specific sites through any subsequent Rushcliffe Part 2 Local Plan Review.



The Ceylon Tea Growers Association conclude that based upon its representations to the overall strategy of the plan their site is suitable at Tollerton Lane for around 70 dwellings. Its initial analysis of the site's technical considerations demonstrates there are no insurmountable constraints to development coming forward on the site therefore the site can be considered as deliverable and developable.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Wilford Road, West Bridgford**

West Bridgford Hockey Club is promoting land east of Wilford Road for Hockey Pitches, other sporting activities and ancillary facilities.

There have not been any specific sports, leisure and recreation evidence documents prepared or planned to be prepared to date. These would include Leisure Facilities Strategy and Playing Pitch Strategy to cover the Strategic Plan area.

Given the scale of the Strategic Plan area, we would urge an up-to-date review of the sports, leisure and recreation facilities available and the associated needs for the whole Strategic Plan area.

#### **Councils' Response**

In order to remove the site from the Green Belt and allocate it for sports, leisure and recreation provision this would need to be justified on the grounds that exceptional circumstances exist to do so. It is not considered there is the evidence to justify that exceptional circumstances do exist to justify that such development needs to take place in this location.

#### **Changes Made**

None.

### **West of Sharphill Wood, West Bridgford**

John A Wells consider that there is a need to plan for the elderly and their site west of Sharphill Wood is suitable and available for the development of a retirement village.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is

proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Edwalton Triangle, West Bridgford**

Mrs Hill and Mrs Plummer consider that the site at Edwalton Triangle meets many of the criteria outlined in the Strategic Distribution study for such uses.

#### **Councils' Response**

The proposed approach to employment and strategic distribution within Rushcliffe is outlined in the Publication GNSP and Employment Background Paper. The employment elements of all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP and the Ratcliffe on Soar Power Station site should be allocated for employment development, including strategic distribution. There is no further requirement for the allocation of any new strategic distribution sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

### **Land south of Greenacre Park, West Bridgford**

The site is being promoted by Havenwood Construction Ltd for residential development to meet the needs of specific groups, such as later living accommodation or self-build units. The site is located within the Green Belt, and within flood zones 2 and 3. Havenwood Construction Limited stated that there are no sensitive environmental designations on or adjacent to the site, but any development proposal would be designed to relate well to the existing Greenacre Park development. They stated that there are a number of services and facilities close to the site.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### Changes Made

None.

### **Regatta Way, Lady Bay, West Bridgford**

The local resident challenged the site 'Lady Bay Regatta Way' as a suitable alternative site. They stated that the site is at a high flood risk. They also stated that there is a conflict of interest as the Council that would grant permission is also the landowner of the site.

### Councils' Response

The comments of the resident are noted. There are no proposals by the Borough Council to allocate within this area land for new development.

### Changes Made

None.

### **Land at Simkins Farm, Adbolton, West Bridgford**

The site is being promoted by Havenwood Construction Ltd for 35-40 dwellings, providing a smaller scale residential development opportunity. The site is located within the Green Belt, but Havenwood Construction Ltd stated that the site is located in an area less valuable in terms of Green Belt. The land is located within flood zone 1, compared to the wider area which is in flood zone 3. Havenwood Construction Ltd therefore identified the site as one of the only areas in the vicinity that is not at a heightened flood risk.

### Councils' Response

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### Changes Made

None.

### **Land south of Wheatcroft Island, Flawforth Lane, West Bridgford**

Comments on this site were received from the site promoter Barratt and David Wilson Homes. They believe consideration should be given alongside Gamston – or instead of Gamston - to this site as an SUE comprising approximately 2500 dwellings. Located on the edge of West Bridgford/Edwalton, the site is available and capable of being planned comprehensively and delivered on a phased basis, with the first phase coming forward for around 1000 dwellings.

### Councils' Response

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is

proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

#### **Changes Made**

None.

#### **Land at Old Grantham Road, Whatton**

Hallam Land Management promoted this site, highlighting that the reasons for the site's refusal of planning permission can be overcome with opportunities for new pedestrian and cycle routes; biodiversity mitigation through replacement planting of native hedgerow and new access; section of site in Flood Zone 3 would not be developed; and impacts on conservation area and landscape and visual amenity mitigated through design and landscaping. The site is suitable, available and achievable and in single ownership.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

#### **Changes Made**

None.

#### **Land at Whatton, south of A52 (RBC-EMP-07)**

The site is being promoted by Knightwood Developments Ltd as a 20 ha strategic logistics site on the strategic road network – A52, 12 miles west of mainline rail at Grantham. They highlight a shortage of logistics for Nottingham conurbation, the site's location outside the Green Belt, its good score within the SA, the strong transport connections identified in Rushcliffe East in the Growth Options Study, and employment benefits.

#### **Councils' Response**

The proposed approach to employment and strategic distribution within Rushcliffe is outlined in the Publication GNSP and Employment Background Paper. The employment elements of all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP and the Ratcliffe on Soar Power Station site should be allocated for employment development, including strategic distribution. There is no further requirement for the allocation of any new strategic distribution sites.

#### **Changes Made**

None.

## **Appendix B: Housing Trajectories**

### *Housing Trajectory for Broxtowe Borough*

Comments on Broxtowe's housing trajectory were received from the following:

Homes England and the Defence Infrastructure Organisation, Bloor Homes, Chetwynd: The Toton and Chilwell Neighbourhood Forum, Elton Garden Village Landowner Consortium, The Crown Estate and David Wilson Homes East Midlands.

In addition to the above stakeholders, one local resident submitted a representation on Broxtowe's trajectory.

#### **Summarised comments from statutory organisations**

Chetwynd: The Toton and Chilwell Neighbourhood Forum state that Chetwynd Barracks is not going to be vacated by the MOD/DIO until at least 2026 and therefore the table should be amended to 150 p.a. from 2027/28 onwards to achieve 1500 homes by 2038. For Toton Strategic Location for Growth, 100 homes p.a. from 2024/25 seems overly optimistic. This needs to be reviewed as part of a new economic growth strategy for the SLG post the IRP.

#### **Summarised comments from developers**

Homes England and the Defence Infrastructure Organisation also state that the start date within the trajectory for the Chetwynd Barracks site needs to be reviewed, given that the site is not due to become vacant until 2026. Homes England and the Defence Infrastructure Organisation will provide a more informed view on delivery rates.

Elton Garden Village Landowner Consortium state that, following the publication of the Integrated Rail Plan, there will be less economic investment at Toton and therefore it is questioned whether land at Toton should be allocated for the full 1,400 homes originally proposed. It is also stated that the proposed development start date at Chetwynd Barracks should be moved back by at least three years. David Wilson Homes East Midlands also state that the proposed trajectory of the proposed strategic sites needs to be revised and the housing needs base is also questioned.

The Crown Estate state that there is a significant step change in the number of homes expected to be delivered per annum compared to the Aligned Core Strategy and compared to current delivery. The delivery assumptions at Toton and Chetwynd are questioned.

Bloor Homes state that the schemes brought forward from the Local Plan Part 2 have taken a significant time to develop and that the trajectory relies on a small number of strategic sites, which usually take longer to permission and develop. A greater range of sites, including in Key Settlements, should be used to ensure housing delivery and land supply over the medium term.

#### **Summarised comments from local residents**

One resident stated that the Integrated Rail Plan has had an impact on housing developments for Land at Toton and more realistic projections need to be included.

This also needs to reflect the land ownership position for the land and that no submissions have yet been made for land to the East of Toton Lane. The trajectory for the Chetwynd Barracks site also needs to be reviewed to reflect that Chetwynd Barracks will not be vacated before 2026.

#### **Councils' Response**

The comments related to the trajectories for Chetwynd Barracks and Toton Strategic Location for Growth are noted. The trajectory has been updated to reflect the responses, updates to the SHLAA and the extension of the plan period. The delivery assumptions are based on up-to-date evidence. Smaller sites are included within the trajectory as there are existing allocations within the Part 2 Local Plan.

#### **Changes Made**

The trajectory has been updated.

### *Housing Trajectory for Gedling Borough*

Comments on Gedling's housing trajectory were received from the following:

The Crown Estate, David Wilson Homes, and Elton Garden Village landowner consortium

#### **Summarised comments from developers**

Elton Garden Village landowner consortium suggested that the delivery of the Top Wighay Farm should be moved back by at least two years to account for the time it will take to gain an implementable planning approval on site.

The Crown Estate notes the shortfall of 620 dwellings to be addressed through the part 2 local plan. The anticipated delivery rate of 497 homes pa is a big step change compared to the 278 homes delivered 2011/12 to 2021/22. Under the HDT, the number of homes required for 2018/19 to 2022/21 was 1,147 but only 978 were delivered.

David Wilson Homes (DWH) objected to the approach to housing need, referring to the consultation response from Marrons Planning which has been undertaken on behalf of a consortium of house builders. DWH consider the trajectory unlikely to be deliverable. The shortfall should be accommodated by adjacent authorities.

#### **Councils' Response**

The trajectory for the Top Wighay Farm site has been updated to reflect the information from the 2022/23 SHLAA. The 2022/23 SHLAA is based on information provided by housebuilders and developers and in accordance with the common SHLAA methodology.

#### **Changes Made**

Trajectory reflects 2022/23 SHLAA.

## *Housing Trajectory for Nottingham City*

Comments on Nottingham's City housing trajectory were received from the following:

Comments were received from Aldergate Properties Ltd, The Crown Estate, David Wilson Home East Midlands, and Elton Garden Village Landowner Consortium.

### **Summarised comments from developers**

Two developers/landowners both commented that the City anticipates 1,000 homes on the Broad Marsh site but there is no evidence to show that this is feasible or viable given the recent refusal of Government Funding. Delivery here at the level suggested appears uncertain and at best will not happen until much later in the plan period.

Another response noted that the average housing delivery in Nottingham City 2011-22 of 1,128 dwellings falls short of the current minimum standard method need for the City of 1,773 homes per year. The City Council is projecting a very significant increase in delivery across the next 5 years. In 2022/23, delivery will be almost 3,000 dwellings. The Councils should confirm in the next stage of the plan whether the 2022 projection was achieved. DWH consider the trajectory to be very ambitious but unlikely to be deliverable.

Comments were made on the reliance on student accommodation, stating that it is not realistic to expect purpose-built student accommodation to increase in the future.

Furthermore, responses highlighted the results of the Open and Green Space Quality Audit (2021) which states that open space standards per population will less likely be met over time and that therefore the remaining open spaces within the city should be protected.

It was requested that the Councils review the proposed trajectory of the proposed strategic sites across Nottinghamshire against the Lichfields Report.

One landowner commented that it is evident there has been historic under-delivery with all but two of the last twenty years seeing net completions below the current Standard Method requirement.

They also noted that Nottingham is geographically the smallest of the eight core cities identified for the 35% uplift and the 2nd highest in terms of density. It is therefore heavily constrained in its ability to significantly increase delivery itself.

Whilst they recognized that the Assessment of Housing Need and Capacity in Nottingham City report refers to 11 action steps that Nottingham City intend to implement to significantly increase its supply of housing, if successful the actions would only result in modest increases in supply, but not in the short term and not close to the extent which is projected within the City's housing trajectory.

Another response commented that windfalls contribute 32% of housing supply within the city in the period 2022 to 2038. The significance of this source of supply over the plan period highlights the need for additional work to justify the assumptions that underpin the assumed windfall rate. Factors that might reduce the rate of windfall



comprise: changes of use from office to residential peaked in 2016/17; redevelopment of employment is likely to diminish as the need to safeguard existing employment sites increases; and open spaces as a source of sites are diminishing and there is a need to protect remaining sites in order to avoid access to open space being further reduced.

The high rate of allowance for windfalls in the city may not therefore be evidence based and it is suggested that to be consistent with paragraph 71 of the NPPF, further evidence is required in relation to future trends (rather than reliance on historical data). The annual target of 1,610 that is proposed for 2022/3 to 2037/8 was only reached twice in the period 2011/12 to 2021/2. This emphasises the need to ensure a sufficient supply and mix of housing sites within the plan area.

#### **Councils' Response**

The trajectory timescales for residential development at the Broad Marsh have been reassessed and pushed back.

The Government are encouraging residential development in urban areas. The windfalls are based on past trends.

The Universities project that there will be a 2.8% per annum increase in student numbers until at least 2030.

#### **Changes Made**

Trajectory reflects 2022/23 SHLAA.

### *Housing Trajectory for Rushcliffe Borough*

Comments on Rushcliffe's housing trajectory were received from the following:

Aldergate Properties, Crown Estate, David Wilson Homes East Midlands, Elton Garden Village Landowner Consortium and IM Land.

#### **Summarised comments from developers**

A number of developers considered the trajectory overly optimistic, noting that Rushcliffe is heavily reliant upon large sites and has previously over-estimated delivery of RAF Newton, South Clifton & East of Gamston/North of Tollerton. Delivery of these sites should be revised and based on reasonable assumptions. Another specifically stated that Land East of Gamston/North of Tollerton should not form an allocation, whilst one believed the numbers attributed to these sites seem inflated as market saturation is likely to occur to slow delivery.

Another considered the windfall figures unjustified and that trend data may not be appropriate. An analysis of historic sources of windfall would be helpful.

Entire trajectory should be reviewed against the Lichfields Report (2020): Start to Finish – What factors affect the build-out rates of large housing sites? This is likely to show a significant undersupply of housing within Rushcliffe against the trajectory.



Two developers noted that trajectories rely on high delivery rates in the early years and assumes a robust housing market until 2038 – in reality there will be peaks and troughs.

One also noted that completions proposed for 2023/4 are 3 x the average over the last 20 years

Another state that the trajectory needs to be revised to be more realistic and more housing allocations/reserve sites are required.

One questions why Cotgrave Colliery appears in the trajectory, given the homes have been delivered.

The next stage of the Plan should confirm whether the 2022/3 projection was achieved.

#### **Councils' Response**

The latest trajectory to 2041 reflects the 2022/23 Strategic Housing Land Availability Assessment (SHLAA) and, where relevant, appropriate assumptions for delivery in the plan period 2023 to 2041. The trajectory has been prepared in accordance with the SHLLA methodology and the assumptions made, including for individual sites, are realistic based on past performance and detailed assessment to determine realistic future delivery rates on sites.

#### **Changes Made**

The trajectory has been updated to reflect 2022/23 SHLAA.

## General Comments on Preferred Approach Evidence Base

General comments on the evidence base were received from the following:

Bloor Homes, Coal Authority, Hallam Land Management Ltd, Harworth Group Plc, Grantham Canal Society, Mr Michael Lyons, Ministry of Defence, National Highways and West Bridgford Hockey Club

### Summarised comments from statutory organisations

Advice from minerals authorities should determine whether surface coal resources are present. If new sites are being considered for allocation these should be assessed against the downloadable GIS data they provide to coalfield authorities in respect of Development Risk plans.

The MOD advise that it should be consulted on any potential development within the Aerodrome Height and Birdstrike safeguarding zones surrounding RAF Syerston, or any development which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation.

National Highways (NH) expect that a robust transport evidence base is undertaken which is shared with them for their review and comments. NH encourage the establishment of a transport working group to include ourselves and the local highway authorities. This will help to ensure that development is located in the best possible place, whilst understanding the likely residual transport infrastructure needs, timescales and potential funding requirements.

### Summarised comments from developers

A number of stakeholders representing interests in the development industry highlighted that an up-to-date Local Development Schemes must be published before the final plan is published for pre-submission consultation.

### Summarised comments from other organisations

There have not been any specific sports, leisure and recreation evidence documents prepared or are planned to be prepared. These would include Sport Facilities Needs Assessments, Leisure Facilities Strategy and Playing Pitch Strategy to cover the Strategic Plan area. Those in Rushcliffe are several years old.

"Think Canal" when considering any strategic planning initiatives and evaluating site selection. Insufficient focus has been given to the benefits of having a linear biodiverse green space to enhance the wellbeing of both existing and new residents. Recent government guidelines say everyone should be within 15 minutes of a blue/green space.

### Summarised comments from local residents

Natural England's new Green Infrastructure Framework and Standards should be adopted by the Greater Nottingham Strategic Plan.

#### Councils' Response

The minerals authorities and MOD have and will, where necessary, continue to be consulted regarding draft allocations within the Strategic Plan.

The Partnership Authorities, National Highways and local transport authorities have and will continue to cooperate with the consultants undertaking the transport modelling work. These statutory consultees have also been consulted on and provided comments on draft versions of the plan and the supporting Infrastructure Delivery Plan (IDP).

Regarding comments on the LDS, an updated LDS has been published by all Councils and will be updated again prior to submission of the Strategic Plan.

In response to comments on sports, leisure and recreational evidence, the Strategic Plan is supported by a Blue and Green Infrastructure Strategy and if required further work will be undertaken to inform non-strategic policies in future plan preparation.

Following adoption of Natural England's Green Infrastructure, the principles have been incorporated within Policy 16.

### **Changes Made**

Policy 16 reflects Natural England's Green Infrastructure Strategy and it is referred to in the supporting text.

## **Sustainability Appraisal**

### *Comments on the Methodology and Appraisal of Preferred Approach Options*

General comments on the Sustainability Appraisal were received from the following:

Ashfield District Council, Barratt David Wilson, Environment Agency, Hallam Land Management, Harworth Group, Mrs Hills & Plummer, Historic England, Herrick & Mattock, Knightwood Developments Ltd, Natural England, Omnivale Pension Scheme and Peveril Securities, Persimmon Homes and Strawson Group Investments Ltd.

#### **Summarised comments from statutory organisations**

The Environment Agency previously submitted comments on the SA at the scoping stage. They welcome the inclusion within SA Objective 5 regarding accessibility to green and blue infrastructure and have made no further comments.

Historic England support the specific objective for the historic environment and welcome the amendments in Table 3 on page 22. It is noted in Section 4 that the majority of tables have an ‘?’ an uncertain for Objective 15 and that makes it difficult.

Natural England welcomes the inclusion for SA Objective 5 regarding accessibility to green and blue infrastructure.

Ashfield District Council believe that an alternative consideration in the SA should have been the implication of not including Hucknall as a sub-regional centre which can accommodate more development. Ashfield considers that it has not been demonstrated that there are no reasonable alternatives to expanding the Top Wighay site for housing.

#### **Summarised comments from developers**

Four stakeholders have questioned the site assessment and selection as not all the evidence has been considered, especially the strategic scale of development required, post Covid.

#### **Comments on Appraisal Objectives**

Four landowners and agents suggested Objective 2 (Employment and Jobs) include scoring against the proximity and access to the strategic highway network. This would reflect the needs of occupiers and is suggested as criteria for strategic logistics in the Iceni Study. It is also suggested that sustainable transport connections to employment sites should be included as part of this objective alongside and the level of public transport provision that serves the location.

They suggested that Objective 3 (Economic Structure and Innovation) also score sites which support decarbonisation (harnessing low carbon technologies) in line with economic innovation as these are linked. Criteria should include assessment of adaptability – whether there are opportunities for adaptable office/industrial/logistics facilities.

### **Comments on the Selection of Alternatives**

One developer believes the SA is not legally compliant. 1) The reasons for selecting the preferred land use allocations and the rejection of alternatives are not given, nor is the Council's site selection process in doing so; 2) the public must be presented with an accurate picture of what reasonable alternatives there were to the proposed policies and why they were not considered to be the best option; and 3) the SA must refer to, summarise or repeat the reasons that were given for rejecting the alternatives at the time when they were ruled out and those reasons must still be valid. There are no reasons for alternative sites being rejected at this stage or an earlier stage.

Another developer is concerned that the SA Report does not explain why the option of a new settlement was discounted. Removal at odds with Ratcliffe on Soar. The SA does not pick up the implications of locating significant employment development at the Ratcliffe on Soar Power Station without any complementary housing development, despite being one of only a few key strategic sites to be newly identified in the plan. Despite the need to reduce the need to travel.

R15.2PA East of Kingston on Soar should have been assessed and not discounted purely on the basis that new settlements were discounted at an earlier stage.

### **Comments on Appraisals of Housing Requirement Options (Stage B2)**

Within the housing requirement appraisal, two landowners supported the approach taken to Objective 1. Option C should be selected.

### **Comments on Appraisals of Growth Strategy Options (Stage B2)**

The same four stakeholders commented on the Strategy Growth Appraisal, noting that Option A and D scored most highly in terms of the positive impact on new housing and economic development due to the connections to the labour market and transport infrastructure. However, B8 uses cannot be located within the main built up area. Furthermore, Nottingham City Centre is facing a net loss of employment space, and this loss should be off-set in surrounding authorities. Option D would deliver benefits and compliment B8 development that require access to the strategic road network.

They suggest that Option C (BGI) can be delivered through B8 development as this can deliver BGI on a meaningful scale.

### **Comments on Appraisals of Housing Distribution Options (Stage 2)**

Another developer is concerned that at Stage B2 there was no scenario that considers Gedling failing to make provision in accordance with minimum annual local housing need. There is also no consideration given to the approach to distributing unmet needs, if undertaken, or the implications for the removal of the proposed Green Belt site at Teal Close prior to consultation.

Option A, in relation to meeting full LHN plus the urban uplift in Nottingham also takes no account of the uncertainty of proposed delivery and the risks of non-delivery and reliance on unidentified sites. The positive effects for both Options A and C in Table 8 (housing distributions options) of the Main SA Report are markedly overstated, and understated for Option B which is the only distribution option capable

of achieving significant positive effects towards housing delivery. SA should consider distribution of Nottingham City's unmet needs.

One developer believed that Option B should be selected. Restrictions on land supply should be considered against those options that promote directing development to the main urban area.

One developer considered that although Option A of meeting housing need ranked highly against the SA criteria (City meeting need plus 35% uplift), there are a number of advantages to delivering housing under Option B (Rushcliffe, Gedling and Broxtowe meeting the City's unmet need).

### **Councils' Response**

In response to Ashfield District Council's concerns regarding the absence of an alternative approach to development around Hucknall, the SA of the Preferred Approach considered different strategies for the distribution of development, including focussing on the main built up area, expanding existing settlements (Hucknall is a Sub Regional Centre), focusing on blue and green infrastructure, or transport infrastructure.

A broad strategic appraisal of each growth strategy option was not undertaken as it would be unreasonable to assess areas or settlements. Doing so would result in a considerable number of appraisals and would be unlikely to provide an indication of the sustainability of each growth strategy.

Informed by the SA, the Preferred Approach identifies a settlement hierarchy of directing development primarily within the main built-up area, then adjacent to the Sub Regional Centre of Hucknall and finally Key Settlements.

At stages B3 and B4 the SA looked at the Preferred Approach itself, including the strategy and settlement hierarchy and the sites themselves. The benefits of directing some development adjacent to Hucknall are highlighted in the SA Report.

Regarding impact on the historic environment, the conclusion that the effects of the strategic options (appraised in section 4) on the Built and Historic Environment are unknown reflects the broad nature of these appraisals and the fact that effects on this objective will depend on subsequent site selection decisions.

### **Response to Comments on Appraisal Objectives**

Operational requirements of the logistics sector, including access to the strategic road network, are addressed within other evidence. In line with wider environmental objectives, the SA's Transport Objective focusses on sustainable forms of transportation including access to public transport and other services. This will assist decision makers identify the most sustainable locations for logistics.

Including access to the strategic highway network as a criterion for logistics developments within the employment objective may result in more unsustainable patterns of employment land provision.

**Response to Comments on the Selection of Alternatives**

The reason for selecting the reasonable alternatives is given at the start of each LPA site assessment Appendix (E to H).

Strategic options (which inform the preferred approach) and site options are all set out in Sections 4 and 6.

Sites were discounted as reasonable alternatives where they did not comply with the preceding assessment strategic options and the selected preferred approach.

The decisions and selection of the preferred strategy and sites are still valid.

Regarding the comment on new settlements and why it was not carried forward, the two growth strategy options taken forward have more positives, indicating that the decision to discount new settlements within the Preferred Approach is the more strategically sustainable. Informed by the SA and other evidence, this strategy was selected by the plan making authorities as the Preferred Approach.

Following this, the SA of the Preferred Approach should not look at sites that do not comply with the preferred growth strategy. These are no longer reasonable alternatives.

**Response to Comments on Appraisals of Growth Strategy Options (Stage B2)**

It is recognised that Strategic Logistics require specific locations that may not conform with the selected growth strategy, given their scale and accessibility requirements.

Separate work has been undertaken to identify those reasonable alternative strategic logistics sites. And they have been assessed independently from other employment sites in the SA. Each has been assessed consistently against the objectives in order to identify sustainability.

**Response to Comments on Appraisals of Housing Distribution Options (Stage 2)**

The SA cannot assess something that has not been put forward and identified as a reasonable alternative.

Regarding the uncertainty regarding delivery, this will also be tested through examination. The Councils have robustly justified the housing requirement and the supply, including within Nottingham City itself. This is set out within the evidence base.

In respect of supply in Gedling, the spatial strategy provides the scope to consider the expansion of Key Settlements, including Bestwood Village, Calverton and Ravenshead. Strategic opportunities for growth are limited and therefore a reliance on non-strategic sites as allocations through future plan preparation will also be required..

The inclusion of Oxtun Road and others to meet the housing need in full is unlikely to change the appraisal of options A, B or C.

The positive scores for options A and C reflect the sustainability of located development within the main urban area, rather than dispersing the City's unmet need within the Boroughs.

### **Changes Made**

#### **Response to Comments on the Selection of Alternatives**

The SA has however been amended to underscore the sustainability benefits of the chosen growth strategy.

The SA main report now refers to Stage B2 assessments in order to emphasise the sustainability of the chosen approach.

### *Comments on the Site Appraisals of Broxtowe Sites*

Comments on the appraisals of sites in Broxtowe were received from the following:

Environment Agency (EA), Homes England and the Defence Infrastructure Organisation, Strawson Group Investments, Omnivale Pension Scheme and Peveril Securities.

#### **Chetwynd Barracks**

Homes England and the Defence Infrastructure Organisation state that they welcome the generally positive scoring of the Barracks. They state that the outline planning application will reach more positive conclusions on certain matters. They are unclear why the Appraisal says that the development will have a 'major negative' effect on pollution and air quality. By delivering a development where journeys can be undertaken on foot, by bicycle or by public transport, the effects of development on air quality will be managed. They also do not agree that any part of the site comprises of Grade 2 Agricultural Land and consider that the entirety of the site is classified as 'urban'.

### **Councils' Response**

The site is located within the Nottingham Urban Area agglomeration zone. However, it is uncertain regarding the impact on air quality, although the sustainability of the site in respect of transport options is noted.

### **Changes Made**

Site has been re-scored minor negative (-), rather than major negative (--) against Objective 11.

Requirements to deliver active travel and public transport infrastructure are included in the mitigation against effects on Objective 11.



References to Grade 2 Agricultural Land have been removed from the appraisal of the site against Objective 16.

### **Land North of Trowell**

Strawson Group Investments in relation to the scoring at Land North of Trowell, state that an illustrative masterplan has been prepared which specifically addressed the perceived landscape impact by limiting development to below the ridgeline and proposing landscaping to further reinforce the boundary to the north. This reduction in developable area reduces the scale of housing deliverable but not to the extent that it wouldn't remain strategic in scale.

#### **Councils' Response**

The SA cannot assess sites on the basis that development will achieve the SA objectives, as the benefits of development cannot be assured. Rather it appraises sites as they are currently, considering their location and environmental conditions against the objectives.

The information submitted by the landowner can however inform the mitigation measures identified.

#### **Changes Made**

Limiting development below the ridgeline and landscaping to reinforce the northern boundary (identified in the masterplan) has been included as mitigation that would help resolve the uncertainty against Objective 14.

### **East of Nuthall**

Omnivale Pension Scheme and Peveril Securities refer to the site East of Nuthall. They state that, if this site was allocated for logistics, it would better support the identified criteria and strengthen the suitability of the site further in terms of Objectives 2 and 3 which under the current Housing designation it scores nothing.

#### **Councils' Response**

Whilst the site was promoted for logistics rather than housing, the appraisal of this site has not changed.

The site has been appraised as a logistics site within the SA of Distribution and Logistics Sites Preferred Approach.

#### **Changes Made**

None

Comments on the appraisal of sites in Gedling were received from the following:

Persimmon Homes, Trinity College, and one local resident.

### **Land off Oxton Road**

Persimmon Homes considers the findings for Land off Oxton Road do not support the Council's conclusions that the land forms a non-strategic role and is only capable of consideration as part of subsequent Part 2 Local Plans. Within Table 16 of the Main Report the site passes the selection criteria for assessment as a reasonable alternative. In relation to housing objectives the site could provide significant positive effects (the same as both Top Wighay Farm and Teal Close). The site also achieves the same assessment for effects in relation to sustainable transport and landscape. Critically, however, there is nothing in the SA process to distinguish the status of safeguarded land where these effects had previously been considered as part of the potential role in meeting future needs.

The local resident commented that two of sustainability appraisal scores need correction/revision for land off Oxton Road. Economic Structure and Innovation: 0 score requires changing to + minor positive, reflecting its mix use, including employment.

Brownfield Land: 1.3ha of the site is registered as Brownfield Land on the Brownfield register, so the score needs correcting to minor negative 'Site is on predominantly greenfield land' not 'Site is on greenfield land'.

### **Councils' Response**

Comments regarding the conclusions for this site are noted. Whether a site is safeguarded land is not a concern within the SA.

The score for 'Economic Structure and Innovation' should remain a 0 to reflect that the site is not currently allocated for employment, retail or mixed use or specific employment uses.

The whole site is 26.16 ha and consists of several SHLAA sites. SHLAA site G1073 (1.3 ha) is brownfield, the remaining area is greenfield. As such, the major negative score has been changed to a minor negative.

### **Changes Made**

The major negative score against the SA's brownfield objective has been changed to a minor negative.

### **New Farm, Redhill**

Trinity College made the following comments on the SA of their site:

'Flooding' - surface water flooding information has been submitted to the Partnership as part of a previous representation which demonstrates that the site could be brought forward without resulting in harm. Reduction in site area further reduces flood risk.

‘Natural Environment, Biodiversity, Blue and Green Infrastructure’ – the summary text fails to recognise the scale of the site and that it is predominantly in use as agricultural land as part of its analysis (meaning that it has a low biodiversity value).

‘Natural Resources and Waste Management’ – no commentary was provided on this criterion and so it is unclear why a negative score was identified.

‘Landscape’ – the text states that ‘the study area has an overall high visual sensitivity, but less so in the immediate context of the urban edge and taking potential mitigation into account’. This representation is supported by a masterplan which has reduced the extent of built form so that it does not extend north of the A60 roundabout, concentrating development closest to the built-up area of Nottingham City.

‘Built and Historic Environment’ - whilst our client considers that evidence prepared by a heritage consultant and submitted in relation to their site has not been properly considered the extent of the built area being promoted has been reduced in the masterplan forming part of this representation. This has drawn built form further away from Bestwood Pumping Station (there is now a separation of over 700m) and this should therefore have a significant impact on the assessment of harm that has been undertaken previously. Key views to the pumping station have been maintained. Landscape buffers have been included to Bestwood Lodge.

### Councils’ Response

On flooding it is noted that a reduction in the site area would further reduce flood risk associated with the site.

On natural environment, it is already noted that the current use of the site is agricultural land. The justification for the natural environment score is that the site contains and is adjacent to trees protected by TPOs. Development on site would result in the loss of existing trees and hedgerows. The updated masterplan shows that playing fields/outdoor amenity space are proposed. Unclear whether existing trees and hedgerows would be lost. No change to score.

The reason for the negative score for natural resources is because the area is classified as grades 2, 3, 3a and 3b but also an area has not been surveyed. The score reflects that it is not known whether the unsurveyed area is not best and most versatile and that development on site would likely increase household waste per head.

It is acknowledged that Landscape constraints affect the site, but the masterplan reduces the extent of built form to south of the A60 roundabout, which would reduce perceived landscape harm. Whilst a landscape and visual briefing note has been provided, a full landscape character assessment has not been undertaken. The mitigation column has been amended to confirm that a smaller site may reduce landscape harm. No change to the score.

The mitigation column for the ‘Built and Historic Environment’ already notes that a reduced site area would minimize impact on Bestwood Lodge and Papplewick Pumping Station.

### Changes Made

None

#### *Appraisal of Sites in Nottingham City*

No comments received on the appraisal of sites in Nottingham City.

#### *Appraisal of Sites in Rushcliffe*

Comments on the sustainability appraisal of site in Rushcliffe were received from the following:

Barratt David Wilson, Ceylon Tea Growers Association, Knightwood Developments, Harworth Group, and Historic England.

#### **Ratcliffe on Soar Power Station**

Historic England noted that the assessment within the Sustainability Appraisal for Ratcliffe on Soar Power Station (Table 22, page 83) was listed as 'green'. They stated that they do not consider that a sufficient assessment has been undertaken at this time in order to ascertain what score the site should achieve.

### Councils' Response

Table 22 identifies those sites which are reasonable alternatives. The 'Green' outcomes reflect the decision that the site is a reasonable alternative. The Ratcliffe on Soar site has been carried forward for a more detailed appraisal in the SA, where it has been appraised against Objective 15. See Appendix G.

### Changes Made

None

#### **Land East of Tollerton**

The Harworth Group and the Ceylon Tea Growers Association consider that under the SA's traffic light system of scoring Land East of Tollerton scores 'amber' (ref: R11.2PA). The justification for amber rather than green was as a result of Tollerton not being identified as a Key Settlement. They consider that Tollerton has the characteristics to be a Key Settlement and even as an Other Settlement is sustainable and capable of delivering high levels of growth.

### Councils' Response

In determining which sites are reasonable alternatives for assessment, the SA has not assessed those sites that would not comply with the strategic distribution of development as set out in the Preferred Approach. This distribution and other reasonable alternative strategies were assessed at Stage B2. Should the

overarching strategy change, and development is directed towards other settlements, 'amber' sites such as this one may be assessed.

#### **Changes Made**

None

#### **Land South of Wheatcroft Island**

Barratt David Wilson provided detailed comments against the SA undertaken for its site. They highlight that their proposal will address unknown effects on objectives relating to retail, health and well-being and community safety.

Furthermore, the score negatively in red against transport is incorrect as the site is located adjacent the A52 which forms part of the strategic highway. It is also adjacent to the MUA, where there is excellent public transport bus provision that could be extended to the site.

Overall, if the above points had been considered and scored positively rather than put with a '?' Land South of Wheatcroft Island would have scored better overall than other sites that have been carried forward.

#### **Councils' Response**

The SA cannot assess sites on the basis that development will achieve the SA objectives, as the benefits of development cannot be assured. Rather it appraises sites as they are currently, considering their location and environmental conditions against the objectives.

The information submitted by the landowner can however inform the mitigation measures identified.

#### **Changes Made**

The provision of a Local Centre (identified in the submitted masterplan) has been included as mitigation that would resolve the uncertainty against Objective 4.

This applies to the appraisal of the site against the transport objective, where in this case a number of mitigation measures are identified to address the existing paucity of public transport and active travel infrastructure.

## Site Selection Report

### *Assessment of Sites in Broxtowe*

Comments on the assessment of sites in Broxtowe within the Site Selection Report were received from the following:

Homes England and the Defence Infrastructure Organisation, Parker Strategic Land, Omnivale Pension Scheme and Peveril Securities and R Salmon.

### **Chetwynd Barracks**

Homes England and the Defence Infrastructure Organisation refer to the Chetwynd Barracks site and state that the evidence base should be amended to make clear that it is only primary education that will be served by a new school on the site, clarification is required regarding existing areas of open space within the site which are to be retained, the reference to BMV agricultural land appears to be incorrect and needs reviewing and clarification is required in respect of the references to heritage assets.

#### **Councils' Response**

The response is noted. The policy specifies the infrastructure requirements.

#### **Changes Made**

The Site Selection Document has been updated.

### **Land south of Nottingham Road, Trowell**

Parker Strategic Land refer to the assessment of land to the south of Nottingham Road, Trowell. They highlight that the site represents an opportunity to extend the main built up area of Nottingham and that technical work has been undertaken in relation to design, transport, landscape impact and the impact on Green Belt to demonstrate that the development would be acceptable. The Masterplan demonstrates that approximately 500 dwellings together with a community/ retail use could be accommodated within the site. They state that there are significant concerns that the site has not been adequately assessed within the site selection report, as the conclusion is simply that no additional sites are required. Given the need to find additional sites to address the pressing housing need, this site should be given full consideration.

#### **Councils' Response**

The detailed submission is noted. However, strategic sites at Field Farm, Stapleford; Boots; Toton Strategic Location for Growth; and Land at Chetwynd Barracks are being carried forward as part of the GNSP. These sites are existing

allocations either within the Aligned Core Strategy or within the Broxtowe Part 2 Local Plan. Due to these allocations, there is no requirement for the allocation of any new strategic housing sites.

#### **Changes Made**

None

### **East of Nuthall**

Omnivale Pension Scheme and Peveril Securities refer to the site east of Nuthall. They consider the site is supported against the assessment criteria as the site is better suited to a strategic logistics hub than for a housing/residential scheme due to the clear accessibility of the site to Junction 26 of the M1 and its strong physical containment. The site is proposed to incorporate significant levels of blue-green infrastructure and therefore this supports the environmental growth objectives and has strong existing connections to the bus and tram network. The site topography enables landscape and visual impact to be mitigated the design will enable objectives surrounding flooding and biodiversity to be met, boosting the overall suitability of the site.

#### **Councils' Response**

The response is noted. A separate exercise has been undertaken to assess whether the site is suitable for logistics development.

#### **Changes Made**

None.

### **Junction 26, Nuthall**

R Salmon refers to the assessment of site at M1, J26, Nuthall and queries why the site has not been taken forward for further consideration for either employment or residential development. They consider that the next stage of the plan should take forward more detailed analysis of "reasonable alternatives" such as this site, particularly in the context of the site's ability to come forward on a strategic scale in collaboration with the neighbouring sites. They highlight the benefits of the site's location in relation to connectivity and the limited impact on the Green Belt.

#### **Councils' Response**

The response is noted. However, strategic sites at Field Farm, Stapleford; Boots; Toton Strategic Location for Growth; and Land at Chetwynd Barracks are being carried forward as part of the GNSP. These sites are existing allocations either within the Aligned Core Strategy or within the Broxtowe Part 2 Local Plan. Due to these allocations, there is no requirement for the allocation of any new strategic housing sites. A separate exercise has been undertaken to assess whether sites are suitable for logistics development.

### Changes Made

None

## Catstone Green

Parker Strategic Land Limited refer to the site assessments for the Catstone Green site. They provide detailed information in respect of flood risk, education need, ecology, landscape impact, Green Belt, heritage and archaeology, contamination and transport. An analysis of existing facilities and accessibility is also provided.

### Councils' Response

The detailed submission and supporting documents are noted. However, strategic sites at Field Farm, Stapleford; Boots; Toton Strategic Location for Growth; and Land at Chetwynd Barracks are being carried forward as part of the GNSP. These sites are existing allocations either within the Aligned Core Strategy or within the Broxtowe Part 2 Local Plan. Due to these allocations, there is no requirement for the allocation of any new strategic housing sites.

### Changes Made

None

## Assessment of Sites in Gedling

Comments on the assessment of sites in Gedling within the Site Selection Report were received from the following:

Barwood Land, Midlands Land Portfolio, Trinity College, and two local residents.

### General Comments

It was noted that the Site Selection Report: Appendix B (Gedling) makes frequent mention of BMI The Park Hospital as being a provider of acute medical services (which it is) however it is a private hospital which is mentioned once so not relevant in terms of emergency care. The proximity or not of a private hospital should not be a consideration for provision of medical services to a development.

### Councils' Response

Noted. BMI The Park Hospital being a private hospital will be taken into account through the assessment of the site and the conclusion reached.

### Changes Made

For clarity, references to BMI The Park Hospital will be amended to refer it being a private hospital.



### **Top Wighay Farm**

One local resident stated that the Site Selection Report Appendix B identifies Hucknall has a full range of services and facilities and provides scope for sustainable travel/energy reduction. It is considered that the proposed development is a long walk from Tram/Train services at Hucknall. Congested area at peak times with car journeys heading towards Gedling involving travel through conservation villages of Linby and Papplewick.

Another resident noted that the assessment of Carbon Neutrality refers to the potential to reduce energy use and Green House Gas emissions from more sustainable means of travel. However, the site is a long walk from the Tram/Train Services at Hucknall, car park is full, and not all will work in Nottingham. Accessing the urban areas in Gedling via the A60 and M1 (N) impacts on Linby/ Papplewick and route is at capacity. Moor Bridge and Bestwood Village to the south are both gridlocked.

#### **Councils' Response**

Noted. Part of the site benefits from outline planning permission granted in March 2022 however, a variation to the Section 106 Agreement is currently outstanding, therefore comments will be dealt with through the Reserved Matters process. The proposed extension to the site will be within 30 minutes travel time by public transport, walking and cycling to key local services. Any planning applications relating to the proposed extension to the site will be supported by a transport assessment.

#### **Changes Made**

None. Note that the Site Selection Document has been updated to reflect the amended boundary of the area proposed for allocation (the sliver adjoining the A611).

### **Land at Middlebeck Farm, Mapperley**

The land promoter stated that the site was discounted in the Site Selection evidence base report as landscape mitigation reduced capacity below a strategic scale. It is therefore stated that further consideration is to be given to whether the site is appropriate for allocation through the Part 2 Local Plan.

However, it is noted that the conclusion in relation to this site conflicts with the Site Selection Report methodology which states that the "thresholds will be applied flexibly and sites which are just under the threshold may be included." In this regard, we note that the Gedling Borough 2022 Strategic Housing Land Availability Assessment (SHLAA) considers the Site (under site reference G1194) has capacity for 450 dwellings, which is marginally below the threshold. It is also included within the Sustainability Appraisal as a reasonable alternative as G07.3PA.

Site reference G07.3PA (Extension to Land at Middlebeck Farm, Mapperley) is located directly to the south of the Site, and the Sustainability Appraisal concluded

that it could have an indicative capacity for 40-60 dwellings. The Appraisal also confirmed that this site was a realistic option adjacent to the main built-up area of Arnold and that when grouped together with our client's Site, would exceed therefore exceed the 500-dwelling threshold for a strategic site. As such, it is considered that the conclusion that the site cannot be considered strategic in scale within the Site Selection Report is incorrect and that the Site should be reconsidered for inclusion as a strategic site as part of the GNSP.

#### **Councils' Response**

The site selection process is a more detailed assessment than that undertaken through the SHLAA and has concluded that the area of land which is more likely to be suitable for development is not considered to be strategic in scale. The site will be reviewed through future plan preparation. Site G07.3PA has planning permission for a single dwelling, although the SHLAA recognises that the capacity of the site could potentially be higher.

#### **Changes Made**

None

### **Land East of Teal Close**

The promotor of this site states that it contains defensible boundaries on all sides and could be easily developed to ensure that development does not encroach into the countryside. It could be sensitively developed to ensure that a meaningful gap between Stoke Bardolph and wider development is maintained. It has no intervisibility or relationship with the heritage assets and conservation areas and does not help to contribute towards preserving the setting of historic towns. The site will support the regeneration of Netherfield and Colwick. In this instance, exceptional circumstances for Green Belt release are established as Gedling and the Greater Nottingham Strategic Planning Partnership has a pressing housing need.

#### **Councils' Response**

The Cabinet meeting on 8<sup>th</sup> December 2022 approved the Greater Nottingham Strategic Plan Preferred Approach document and Sustainability Appraisal in so far as it related to Gedling Borough 'with the exception of proposals to release Green Belt land at Teal Close, in light of the Ministerial Statement made on 6<sup>th</sup> December 2022 and to be made clear in an updated National Planning Policy Framework'. The National Planning Policy Framework states at paragraph 145 that there is no requirement for Green Belt boundaries to be reviewed as part of plan preparation and the principle of only altering boundaries in exceptional circumstances remains unchanged. By allocating existing safeguarded land to extend the Top Wighay Farm site, no change to the Green Belt boundary is proposed by the Greater Nottingham Strategic Plan.

#### **Changes Made**

None

### New Farm, Red Hill

The site promotor states that the site selection process has failed to allocate sites that are in line with the Settlement Strategy and meet all necessary criteria, specifically New Farm, Redhill. The site is immediately adjacent to the urban boundary of Nottingham, a priority location for development. Key changes have been made to the scheme – the development now does not extend further north than Leapool Roundabout and the majority of the site is located within the existing landscape ridgeline. This has helped to draw development over 700m away from heritage assets located at Bestwood Pumping Station and the proposal's impact on the wider landscape has been reduced.

The Sustainability Appraisal scored the site very positively in terms of the potential for 'Housing' and that the conclusions would have been even more favourable had the assessment recognised the proposed on-site delivery of employment uses, shops, a primary school and open space as part of a strategic development site and 'Transport'. Information provided by the consultee demonstrates that the proposal is acceptable from a highways perspective.

### Councils' Response

The above comments are noted in relation to the sustainability of the site. The SA assessment reflects the methodology as explained in the SA Report.

In response to the representations submitted on the Preferred Approach, County Highways have commented that *'The surrounding road network is already heavily congested and any further traffic will not be acceptable for any safe movement of traffic in the area. Alternative means of transport in the form of a park and ride would need to be considered in the vicinity of the A60 Leapool roundabout to encourage more sustainable modes of transport with route/s through the development site to alleviate any further congestion on the A60 traffic corridor which cannot accept any further significant traffic impacts. Surrounding roads would also need to be assessed to ensure that they could accommodate any additional traffic. The site would require a revised Transport Assessment and traffic modelling in support of any application to assess the traffic impacts in the area. If the site is pursued, then the development would need to have multiple junctions onto the highway network. Junctions would need to be designed to Nottinghamshire County Councils Highway Design Guide. Due to the scale of development, significant highway and transport infrastructure improvements would be required. Please note that there are two points of access from Queens Bower Road onto Bestwood Lodge Drive which is a cul de sac and due to the capacity of the existing residential estate roads in this area a max of 400 dwellings could be served from the south western boundary of the site but this should include any other committed developments and existing housing leading up to the site.'*

The site will be reviewed through future plan preparation.

### Changes Made

None. Note that the Site Selection Document has been updated to reflect County Highways comments.

### *Assessment of Sites in Nottingham City*

No comments received on Nottingham City sites in the Site Selection Report.

### *Assessment of Sites in Rushcliffe*

Comments on Rushcliffe sites within the Site Selection Report were received from the following:

Barratt David Wilson, Barton in Fabis Parish Council, RBC Gotham Ward Councillor, RBC Sutton Bonington Ward Councillor, Gotham Parish Council, Kingston on Soar Parish Council, Knightwood Developments, Ministry of Defence, Parker Strategic Land, Ratcliffe on Soar Parish Council, Thrumpton Parish Meetings and four local residents.

#### **Colston Gate**

Parker Strategic Land has made comments against the site selection report for the site at Colston Gate, in particular in relation to land ownership, and the statement that no additional land is required.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

#### **Changes Made**

None.

### **Land South of Wheatcroft Island**

Barratt David Wilson states that of the reasonable alternatives assessed, land South of Wheatcroft Island forms one of 22 reasonable alternative sites for housing. The assessment in Appendix D to the Site Selection Report considers that the site has the capacity to deliver 2000 dwellings. Although it has carried out a high-level analysis of the site and considers it could accommodate 2,500 – 2,800 dwellings.

#### **Councils' Response**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

### Changes Made

None.

### Land West of RAF Newton

The Ministry of Defence remains committed to the disposal of the land to the west of RAF Newton which is no longer required for operational development. It notes that the Council quite rightly attribute high scoring within the sustainability appraisal report and consider the site as a reasonable alternative to the sites identified to meet the future housing needs for the area.

### Councils' Response

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Publication GNSP and Housing Background Paper. While it is proposed that all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP, there is no requirement for the allocation of any new strategic housing sites.

### Changes Made

None.

### Land South of A52, Whatton

Knightwood Developments commented overall that this site has scored positively as part of this appraisal, if considered for B8 use it believes the site should be strongly considered as a suitable allocation within the Preferred Approach for a strategic logistics site.

One resident refers to the Nottinghamshire Core & Outer HMA Logistics Study, noting that the site does not meet the necessary criteria - it is nowhere near the M1 corridor and is very badly served for road access towards the A1. The stretch of the A52 between Whatton and the A1 is infamous for the dangerous bends which regularly see lorries in the ditch.

### Councils' Response

The proposed approach to employment and strategic distribution within Rushcliffe is outlined in the Publication GNSP and Employment Background Paper. The employment elements of all those strategic sites allocated by the existing Rushcliffe Local Plan Part 1: Core Strategy should be carried forward as part of the GNSP and the Ratcliffe on Soar Power Station site should be allocated for employment development, including strategic distribution. There is no further requirement for the allocation of any new strategic distribution sites. The site would require Green Belt land release and the exceptional circumstances do not exist to justify this.

### Changes Made

None.

### Land south-west of Nottingham

RBC Gotham Ward Councillor, Barton in Fabis Parish Council, Gotham Parish Council, Kingston on Soar Parish Council, Ratcliffe on Soar Parish Council and Thrumpton Parish Meetings all made comments in relation to this site. All respondents did not support the site coming forward as an allocation and considered it unsuitable as a residential site. They stated that the area is particularly sensitive and important in Green Belt terms given the significant quantum of proposed and permitted developments in the area. They also raised concern over the capacity of the strategic and local road network given cumulative impact of other proposed and permitted developments in the area.

<b>Councils' Response</b>
Comments noted.
<b>Changes Made</b>
None.

### Nottingham 'Gateway'

RBC Councillors for both Gotham and Sutton Bonington, Barton in Fabis Parish Council, Gotham Parish Council, Kingston on Soar Parish Council, Ratcliffe on Soar Parish Council and Thrumpton Parish Meetings all commented on the assessment of this site. They do not support the site coming forward as an allocation and consider it unsuitable as a strategic distribution site. The Sutton Bonington Councillor stated that the site would encroach on the southern villages, merging them to the City, failing the purpose of the Green Belt. It was also raised that the capacity of the strategic and local road network would be of concern given the cumulative impact of other proposed and permitted developments in the area.

RBC Councillor for Gotham, Barton in Fabis Parish Council, Gotham Parish Council, Kingston on Soar Parish Council, Ratcliffe on Soar Parish Council and Thrumpton Parish Meetings specifically stated that the site does not meet the selection criteria for a strategic distribution site as outlined in the recent logistics study. The site is not a priority in terms of the "sequential order" for site selection, does not suit the occupier demand (close to motorway junctions) and does not perform well against the site selection criteria outlined in the Logistics Study. They stated that there is therefore no rationale for its consideration as a strategic distribution site.

<b>Councils' Response</b>
Comments noted.
<b>Changes Made</b>
None.

### North and East of Bingham

A resident considered that it is disappointing that the conclusion ("No Current Need") fails to come out more strongly against the coalescence which is implicit in this proposal.

<b>Councils' Response</b> Comments noted.
<b>Changes Made</b> None.

#### **North of Owthorpe Road, South of Owthorpe Road and Colston Gate Cotgrave**

One local resident submitted comments on the three above sites at Cotgrave. They highlighted that the sites are well outside of the A52 corridor, would increase Cotgrave by unacceptable amount; the road network is inadequate for increase in housing; they would harm Cotgrave Forest and harm a major foraging area for larger mammals – deer, fox, badger.

<b>Councils' Response</b> Comment noted.
<b>Changes Made</b> None.

#### **East of Gamston/North of Tollerton**

A resident commenting on the assessment of this site stated that: the road network is already congested; Tollerton Lane/Cotgrave Lane and Cotgrave Road are already 'rat run' routes; it would erode the rural character; and the necessary road improvements, schools and community facilities will not be delivered.

<b>Councils' Response</b> Comment noted.
<b>Changes Made</b> None.



## Housing Background Paper

Comments on the Housing Background Paper were received from the following: Barwood Development Securities Ltd, Derbyshire County Council, and Rentplus UK

### Summarised comments from statutory organisations

Derbyshire County Council considers the approach to housing provision is well justified and soundly based on a range of supporting and up-to-date evidence. Whilst the standard method has been used as the starting point, it has been shown through a capacity assessment that the need for the City cannot be met. Green Belt constraints comprise exceptional circumstances which prevent neighbouring authorities from accommodating this unmet need. The County Council emphasise the strategic importance of the Green Belt between Derby and Nottingham. Furthermore, the shortfall will arise towards the end of the planning period, allowing for monitoring and review within 5 years, and the housing provision figure of 52,300 compares with the need figure of 52,510 across the plan area.

### Summarised comments from developers

Failure to meet the combined housing needs of the authorities does not comply with planning guidance which requires that housing needs within joint plans should at least be the sum of the local housing need for each local planning authority within the area. It will be for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area. Housing need figure should be 57,763.

Delivery rates are over inflated within the paper, especially on the strategic sites that do not yet have planning permission.

The recognition that there is a need for low-cost home ownership and that it should be included in the affordable housing mix is welcomed. However, there is an absence of expanding on other forms of tenure that can satisfy this need including Rent to Buy and others including initiatives that may not even exist yet. Rent to Buy offers an opportunity to provide a wider housing mix.

#### Councils' Response

The NPPF states that the standard method is the starting point for determining housing need, not the end point. The Councils consider their approach is sound, with further information provided within the Housing Background Paper. Delivery rates are based on the best available knowledge, informed by developers, as set out in the plan making authorities' common SHLAA methodology. Build to rent is supported where appropriate, and housing mix is informed by the latest Housing Needs Assessment, prepared in 2024.

#### Changes Made

Housing Background Paper has been updated to reflect the latest supply position.



## Housing Needs Assessment

Comments on the Housing Needs Assessment were received from the following:

Rentplus UK, and Marrons Planning

### Summarised comments from developers

Apart from ONS data it is unclear where the research comes from and what surveys have been done and what questions were asked. Rentplus would encourage all local needs surveys to include all NPPF forms of tenures and housing needs including “other”. Rentplus is wholly supportive of local needs surveys but remains concerned that particular housing needs (including rent to buy) could remain hidden if the questions asked are not inclusive enough. On another note, the affordability work carried out is extremely welcome to see and is even more support for the need for more affordable access to home ownership.

In order to address the limited number of windfalls within villages, housing needs surveys should be updated for rural areas and sites allocated to meet specific local housing needs.

### Councils’ Response

The Housing Need Assessment’s methodology complies with the Government’s practice guidance on Housing and Economic Needs Assessments. It includes additional data to the Census, such as house price statistics, ONS income data, Annual Survey of Hours and Earnings, the Housing Register information and data from the Department for Levelling Up, Housing and Communities.

The Census data is critically important as it links local data to national changes and provides information on house types, household composition and housing conditions. Critically, the approach undertaken by Iceni (the consultants who undertook the assessment) has been accepted through a range of Local Plan examinations

The Housing Need Assessment (2020) has been updated as it is over 3 years old and up to date 2021 Census data has been released.

Regarding the needs of specific villages, this will be addressed, if necessary, as part of local authorities’ future plan preparation.

### Changes Made

The Housing Need Assessment has been updated and informs housing policies within the Publication Draft Strategic Plan.

## **Green Belt Review and Background Paper**

### ***Green Belt Review Methodology***

Comments on the Green Belt Review were received from the following:

Barratt David Wilson Homes, Barwood Land, Barwood Development Securities, Mrs Hill and Mrs Plummer, Mr Michael Lyons, and Stagfield Group, William Davis Homes

#### **Summarised comments from developers**

A number of developers/landowners highlighted the broad conclusion, within the 2006 Review, that countryside between Nottingham and Derby as well as the north are best functioning areas of Green Belt and that this should remain valid and relevant when assessing sites. The methodology should also remain unchanged. Furthermore, Green Belt policy has not changed since the 2006 Review. Consequently, the only changes that are relevant are physical changes in the Green Belt.

In addition to a Stage 1 assessment of broad areas, further work is required in order to assess how well individual sites, as well as reasonable alternatives, perform in respect of the Green Belt. Stage 2 assessments should not be deferred to the Local Plan Part 2.

The strategic plan should outline its approach to the Green Belt and confirm that a Green Belt Review will take place to accommodate need that cannot be met within urban areas and allocations. It should also outline its approach to safeguarding.

Assessment of broad locations are so large that the scoring becomes meaningless when considering individual housing sites. A more detailed assessment is required to identify additional land (including on the edge of Key Settlements) that will off-set the undersupply of housing land that is proposed in the plan.

William Davis expressed concern over the size of Broad Area of Green Belt considered at Area 3B East of Clifton and commented that the area assessment cannot reflect the contribution that the North Ruddington site for 500 dwellings would make to the Green Belt. They disagreed with the assessment of the area, stating that the site would have limited harm to the Green Belt purposes, and would establish an improved defensible Green Belt boundary.

The criteria provided in the methodologies for this purpose do not just deal with the physical distances between settlements. It is also concerned with the perception of distances between settlements being reduced. However, perception is largely experienced visually. As stated above within the site visibility section, the ZTV shows that the proposed development will only be seen from a very limited number of publicly accessible areas. Furthermore, through careful consideration to the siting of development and the mitigation measures such as the planting of new woodland belts these limited areas from where the proposed development will be seen can be further reduced. Similarly, the Rushcliffe assessment of purpose 1 – sprawl, argues that due to the openness of the site through the lack of internal field boundaries there would be a perception of urban encroachment. Again, the areas from where this

perception can be experienced are limited and can be mitigated through considered design. (PA/280 and PA/732)

### Summarised comments from local residents

The Green Belt review should reflect the guiding principles of permanent and a severe restriction on building.

The purpose of the Green Belt is not solely to prevent Nottingham and Derby from merging. This is a distortion of the Green Belt principles and objectives and references to this should be corrected.

Reference to buildings and infrastructure being a negative factor on the function of the Green Belt, ignores the fact that where these existed prior to the formation of the Green Belt, they cannot be judged as somehow weakening the Green Belt, if they didn't detract from its designation in the first place. Such negative marking should be reversed.

### Councils' Response

In response to comments regarding the staged approach to the Green Belt assessment, the stage 1 assessment considers broad areas and is considered to be sufficient to inform the allocation of strategic sites. The results of the stage 1 review also provide the wider context for more detailed Stage 2 site specific assessments for non-strategic sites, where required, to support future plan preparation.

The edges of Key Settlements are included within the scope of this Review. However, it is noted that para 2.2 is incorrect (and conflicts with para 2.11). Para 2.2 states that 'The scope of the Stage 1 assessment includes the urban area, key settlements for growth and other villages'. Para 2.11 correctly excludes other villages (which will be considered at future plan preparation stage).

Non-strategic sites will be considered through the preparation of future plan preparation. The Publication Draft Plan includes clear policy provisions for further consideration of Green Belt release as part of future plan preparation. The Preferred Approach focussed on the preferred planning strategy for meeting housing and employment needs based on a defined settlement hierarchy. The strategic plan will ultimately cover all of the matters outlined in the NPPF (para 20).

The methodology for the Green Belt review has been revisited in order to follow the same broad approach as the previous Green Belt assessments, using the same assessment criteria and matrix framework but ensuring that the methodology is transparent and applied consistently across the four authorities. Comments from developers regarding 'mitigation' are noted but the scope for improvements arising from development are not a matter for the Green Belt review which assesses how well broad areas are currently performing against the purposes set out in para 143 of the NPPF.

The purpose of this Review is to assess how well parts of the Green Belt are performing against the purposes set out in paragraph 143 of the NPPF and the conclusions have informed the decisions made about specific sites in the Green Belt through the preparation of the Greater Nottingham Strategic Plan. Further commentary is provided in the Housing Background Paper and decisions regarding site selection, taking account of how well parts of the Green Belt perform against the purposes of including land in the Green Belt are set out in the Site Selection Report.

The Green Belt Assessment Matrix included on page 9 of the Green Belt Review methodology document sets out the 5 purposes of the Green Belt as set out in the NPPF. Each area has been scored against how well the area meets each of these purposes. One of these purposes is to assist in safeguarding the countryside from encroachment. Where encroachment by inappropriate development has taken place, then the Green Belt in that area will score less well for this purpose. However, other purposes may mean the area scores highly overall.

#### **Changes Made**

Correct parag 2.2 to read 'The 'Stage 1' Review is targeted in that it focusses on the urban area *and* key settlements for growth ~~and other villages~~'.

### ***Review of land within Broxtowe***

Comments on the review of Green Belt Review of land within Broxtowe were received from the following:

Mr M Trought, Strawson Group Investments, Bloor Homes, Mr M Lyons, Omnivale Pension Scheme and Peveril Securities, Parker Strategic Land Limited (Catstone Green site).

#### **Broad Areas 38 and 39**

Bloor Homes state that the division of the broad areas does not fully respond to the site topography and proposed nature of development shown in their Concept Masterplan. New built development could respond to and fit within this development line, creating continuity in the extent of the built-up area. The scores, particularly for Broad Areas 38 and 39, would be lower if the development line was factored into the assessment. They state that the tram line is not a strong, permanent and defensible Green Belt or development boundary, the site is entirely surrounded by existing urban land, it will not lead to the coalescence of Chilwell and Stapleford, the development line would therefore be a suitable distance away from the Bramcote Conservation Area to preserve its historic setting and the change of character and appearance of the area from new infrastructure would mean that development around and adjacent to it would be appropriate and sensible.

A resident queried why the Green Belt Assessment scores for Areas 38 and 39 had decreased. The only changes are that the Strategic land for Growth which was previously Green Belt has been allocated which makes these areas even more valuable. With the Integrated Rail Plan and the cancellation of HS2, consideration should be given to redefining the Strategic Land for Growth as Green Belt.

#### **Councils' Response**

The methodology for the Green Belt review has been revisited in order to follow the same broad approach as the previous Green Belt assessments, using the same assessment criteria and matrix framework but ensuring that the methodology is transparent and applied consistently across the four authorities.

Scores have changed only marginally in order to reflect the need for a consistent approach across each authority and to accord with the updated methodology.

The scope for improvements arising from development is not a matter for the Green Belt review which assesses how well broad areas are currently performing against the purposes set out in paragraph 143 of the NPPF.

The assessment considers broad areas and is considered to be sufficient to inform the allocation of strategic sites.

#### **Changes Made**

Scores have changed in order to reflect the need for a consistent approach across each authority and to accord with the updated methodology.

#### **Broad Area 44**

Strawson Group Investments state that, as Trowell falls west of the M1 where the existing village and Ilkeston already erode the Green Belt, any extension to Trowell, so long as it is contained west of the M1 would not have a meaningful impact on the openness between Derby and Nottingham, therefore ensuring the Green Belt fulfils its main function. Comments are made in relation to Broad Area 44 including highlighting the Broad Area has been enlarged since the 2015 review and that scores should be lower in respect of unrestricted sprawl of settlements and encroachment into the countryside.

#### **Councils' Response**

The scores are consistent with the approach set out in the methodology and a consistent approach has been taken by each authority.

#### **Changes Made**

None

## Broad Area 24

Omnivale Pension Scheme and Peveril Securities refer to the site east of Nuthall and state that development would support compensatory improvements to the Green Belt through the delivery of enhanced environmental quality and accessibility to the site. The weight given to the 2015 review, given its age, is questioned. They state that, comparatively to other sites within the Broxtowe Green Belt Review, it is one of the lower ranking sites. It is considered that, by adopting a sensitive approach to the layout, design and landscaping of the proposed logistics park, the proposals would not lead to the coalescence of Nottingham and Nuthall and would ensure that this purpose of the Green Belt is maintained. They consider that the demonstrable and significant shortfall in the availability of strategic land for logistics and distribution and the high levels of market demand for sites of this scale and the high levels of unemployment are exceptional circumstances to justify Green Belt release. Due to the lack of brownfield sites to meet the logistics need, they consider that Green Belt release is required and justified.

### **Councils' Response**

The scope for improvements arising from development is not a matter for the Green Belt review which assesses how well broad areas are currently performing against the purposes set out in paragraph 143 of the NPPF.

### **Changes Made**

None

## **Broad Area 27**

Parker Strategic Land Limited state that the removal of land to the east of Catstone Hill should be reassessed to score 9 as built development would have a much more limited effect on Green Belt purposes. They consider that 'exceptional circumstances' exist to release the site from Green Belt to look towards meeting an evidenced need of Greater Nottingham, including the majority of Nottingham City's shortfall in need.

### **Councils' Response**

Scores are consistent with the approach set out in the methodology and a consistent approach has been taken by each authority. The site is considered further through the site selection work.

### **Changes Made**

None

## Broad Areas 36 to 39

One resident states that the Green Belt boundaries have been drawn so as to maintain the open break between Stapleford and the built-up areas from Toton to

Bramcote. Any proposal concerning the release of Green Belt land that brings about the coalescence of these built-up areas must be rejected.

<b>Councils' Response</b>
Noted.
<b>Changes Made</b>
None

### ***Review of Land within Gedling***

No comments were received on the Green Belt Review of land within Gedling.

### ***Review of Land within Nottingham City***

No comments were received on the Green Belt Review of land within Nottingham City.

### ***Review of Land within Rushcliffe***

Comments on the Green Belt Review of land within Rushcliffe were received from the following:

Barratt David Wilson, Barwood Development, Ceylon Tea Growers Association, Haworth Group, Mather Jamie, Oxalis Planning and Mrs Hill & Mrs Plummer.

### **FAR/A**

Oxalis Planning identifies a difference in scoring for the area known as FAR/A between the current green belt review and the previous green belt review.

<b>Councils' Response</b>
The methodology for the Green Belt review has been revisited in order to follow the same broad approach as the previous Green Belt assessments, using the same assessment criteria and matrix framework but ensuring that the methodology is transparent and applied consistently across the four authorities. In addition, since the last strategic review of the green belt, there has been a significant reduction in Green Belt to the South of FAR/A in order to accommodate the South of Clifton SUE. This would have had a bearing on the assessments in that area. (Paragraphs 2.3-2.4 of the Green Belt Review methodology).
<b>Changes Made</b>
None



## **Tollerton**

The Harworth Group state that there is an omission in the Green Belt Review as it only assesses the areas to the north and west of Tollerton, and that there are exceptional circumstances to assess all around Tollerton, based upon their representation when read as a whole. The Ceylon Tea Growers Association provide similar comment and refer to the site-specific assessment undertaken for Rushcliffe's Local Plan Part 2 which concludes that the green belt is of low-medium importance.

### **Councils' Response**

The scope of the strategic green belt review is to undertake strategic assessments around the main built up area of Nottingham, key settlements and regeneration opportunities. The assessment to the north and west of Tollerton is as a result of these broad areas being adjacent to the main built up area of Nottingham. The scope of the green belt review at this stage does not extend to the east and south of Tollerton.

### **Changes Made**

None

## **WBR/A**

Mrs Hill & Mrs Plummer consider that the site known as Edwalton Triangle is suitable for release from the Green Belt, as there are exceptional circumstances to do so, and the land is only of medium importance to the purposes of including land within it as identified by Rushcliffe's 2013 green belt review.

### **Councils' Response**

The methodology for the Green Belt review has been revisited in order to follow the same broad approach as the previous Green Belt assessments, using the same assessment criteria and matrix framework but ensuring that the methodology is transparent and applied consistently across the four authorities (paragraphs 2.3-2.4 of the Green Belt Review methodology).

### **Changes Made**

None

## **RUD/A**

Barratt David Wilson have made comments in relation to the land south of Wheatcroft Island. They note that the site falls within broad area RUD/A in the current green belt review. They consider that there has been a change in the nature of development within the area as previously assessed in the 2013 green belt review. They also make a case for why there should be a full green belt review



**Councils' Response**

Comment noted. Whether there should be a full Green Belt review would be dependent on the establishment of exceptional circumstances to do so, which is a separate exercise to the green belt review itself.

**Changes Made**

None

**RUD/B and RUD/C**

Mather Jamie are promoting Ruddington East. The site falls within areas RUD/B and RUD/C. Mather Jamie Ltd disagreed with the conclusions of the two areas and stated that Ruddington East would have limited harm to the Green Belt purposes, claiming the site could help establish stronger defensible boundaries, improve green infrastructure and enhance accessibility to the countryside.

Barwood Development Securities Ltd are promoting land to the south of Flawforth Lane for 400-500 dwellings. The site falls within area RUD/B. They are concerned over the size of RUD/B and commented that the area assessment cannot reflect the contribution the individual site will make to the Green Belt, and requested the undertaking of a refined assessment of the Green Belt. They disagreed with the assessment of the area, stating that the site would have limited harm to the Green Belt purposes, and would establish an improved defensible Green Belt boundary.

**Councils' Response**

Comments regarding RUD/B and RUD/C are noted but the scope for improvements arising from development are not a matter for the Green Belt review which assesses how well broad areas are currently performing against the purposes set out in para 143 of the NPPF.

The scope of the strategic Green Belt review is to undertake strategic assessments around the main built up area of Nottingham, key settlements and regeneration opportunities should exceptional circumstances be established to allocate strategic sites. The results of the stage 1 review will also provide the wider context for more detailed Stage 2 site specific assessments for non-strategic sites, where required, to support future plan preparation. The Green Belt review methodology sets out clearly why the broad area approach has been undertaken.

**Changes Made**

None

## Infrastructure Delivery Plan

Comments on Infrastructure Delivery Plan (IDP) were received from the following:

Derbyshire County Council, Grantham Canal Society, and Nottingham Local Access Forum

### Summarised comments from statutory organisations

Derbyshire County Council request that they are engaged on the detailed transport modelling that will inform the IDP. Further strategic level transport modelling and planning could fall within the remit of the combined authority.

### Summarised comments from developers

Homes England and the Defence Infrastructure Organisation requested clarity on the timescales for the completion of the strategic transport modelling as they are completing their own modelling to support the outline planning application. They also seek clarity regarding any future deficit in primary school education and state that there is nothing in the IDP that says there is a specific secondary capacity issue that must be mitigated by development at the Barracks. Homes England and DIO are engaging with the local Clinical Commissioning Group (CCG) as part of the preparation of the proposed outline planning application to test the detail of the scale of facility that may be required.

### Summarised comments from other organisations

Nottingham Local Access Forum endorse the Key Considerations that future development should utilise and enhance the existing walking and cycling network. Walking and cycling forms a critical part of facilitating '20-minute neighbourhoods', which forms a key element of the Preferred Approach Strategy. Links should be explored between the enhancement of Blue and Green Infrastructure and walking and cycling.

Grantham Canal Society ask that attention is given to conditioning any planning permissions to enable funding for canal improvements and also consider using s106 planning gains and CIL funds to not only protect and enhance the canal environment and its surrounds but also to offer a longer term "dowry" to ensure there are sufficient funds for future maintenance, rubbish clearing and planting.

#### Councils' Response

Transport Modelling, examining the additional traffic generated by the strategic sites and mitigation measures is being undertaken. This has informed site specific development requirements and supporting Infrastructure Delivery Plan and the plan's Viability Appraisal.

Following consultation with the local education authorities and the Integrated Care Board (ICB) (formally CCG), the IDP establishes the additional educational and health provision that occupants within the strategic sites will generate. This includes the infrastructure and service needs generated by the Chetwynd Barracks site.

Regarding blue and green infrastructure, requirements to include walking and cycling routes have been included within the development requirements for

strategic sites. This is informed by the Greater Nottingham Blue and Green Infrastructure Strategy.

**Changes Made**

None

## Heritage Asset Assessment

Homes England and the Defence Infrastructure Organisation, Chetwynd: The Toton and Chilwell Neighbourhood Forum.

### Summarised comments from statutory organisations

Chetwynd: The Toton and Chilwell Neighbourhood Forum state that for the site North of Toton (B09.2PA), Wheatgrass farm is included as a 'Local Interest Building' but has been demolished. For Chetwynd Barracks (B09.4PA), Historic Parks and Gardens is stated as 'None'. However, the importance of the Memorial Gardens adjacent to the Grade II listed memorial has been overlooked and should be included.

### Summarised comments from developers

Homes England and the Defence Infrastructure Organisation state that the proposed outline planning application masterplan will provide a detailed assessment on heritage assets based on a robust technical assessment of significance. They seek clarification regarding the term heritage-based regeneration and welcome confirmation that “some”, rather than ‘all’ non-designated heritage assets could be capable of re-use. They think that the next version of the Plan should more accurately reflect the conclusion reached in the authorities’ own evidence base about the potential for some assets to be retained and converted, and to emphasise that this will be informed by Homes England and DIO’s assembled evidence base.

#### Councils’ Response

The comments regarding Wheatgrass Farm are noted. The Memorial Gardens are not a registered Historic Park and Garden (based on Historic England’s registered list), but their importance is noted.

It is noted that a more detailed assessment of heritage assets is being undertaken and will be a consideration as part of any future planning application. The policy will also be based on the most up to date information.

#### Changes Made

The Heritage Asset Assessment has been updated to remove reference to Wheatgrass Farm.

The site specific policy for Chetwynd Barracks provides clarification regarding the heritage assets on the site.

## Employment Background Paper

Comments on the Employment Background Paper were received from the following:

Oxalis Planning Ltd

### Summarised comments from developers

The approach to re-basing the requirement to a 2022 start date is fundamentally flawed and is not justified. The Lichfield Employment Land Needs Study assesses the requirements between 2018 and 2038. A simple re-basing of the requirement to a 2022 start date on a pro-rata basis is flawed given the origin of the requirements in the Regeneration Scenario. In order to appropriately adjust the requirement figure, a review of delivery in the past 4 years from 2018 – 2022 should be undertaken and this figure deducted from the overall requirement.

The Background Paper should distinguish between the general needs of employment uses and those of strategic distribution/logistics. Current supply of latter is not appropriate. Key distinctions should be added at para 8.7.

The Background Paper should address the potential double counting of land that is also identified for general employment in the Lichfield Study. Land unsuitable for strategic distribution should be removed. Residual need is 950,000 sqm not 601,000 sqm.

Background Paper should acknowledge that the economic importance of providing strategic distribution provide exceptional circumstances to remove sites from the Green Belt.

### Councils' Response

Agreed the Plan has been rebased to 31<sup>st</sup> March 2023 and annual need extrapolated to 2041. Delivery between 2018 – 2023 accounted for.

The supply of strategic warehousing sites has been reviewed and updated using the same methodology as the Strategic Logistics and Warehousing Study. This is set out in the Publication Draft Employment Background Paper.

### Changes Made

Strategic warehousing commitments have been disaggregated from the general supply of employment land.

## Employment Land Study (2021)

Comments on the Employment Land Study were received from the following:

Avant Homes, David Wilson Homes, Davidsons, Gladman, Havenwood Construction Ltd, IM Land, Metacre (Calverton) (Bunny), Marrons Planning, Richborough Estates and William Davis Homes

### Summarised comments from developers

A number of landowners and developers identified that the housing targets will meet forecast economic growth based on the 'regeneration' scenario set out in the May 2021 Employment Land Study. However, this scenario does not take account of expected development and subsequent job growth created by the East Midlands Freeport, and HS2. These developments will lead to additional employment growth in the Nottingham Housing Market Area (HMA)

<b>Councils' Response</b>
See Chapter 6 response.
<b>Changes Made</b>
See Chapter 6 response.

## 4. Distribution and Logistics Preferred Approach (September 2023)

- 4.1. This consultation focused on the approach to strategic distribution and logistics. The consultation provided detail regarding the need for distribution and logistics development, identified existing and future supply and also identified two new allocations which would help to meet the unmet need.
- 4.2. The consultation ran between 26th September and 7th November 2023. 134 individual comments were received from 53 respondents.
- 4.3. This section of the Responses to the Preferred Approach Consultations provides a summary of the comments received as part of the consultation and the Council's response to these comments. It is structured according to the four chapters within the Preferred Approach and its appendices followed by comments made on supporting evidence. Any comments on the evidence base have been organised according to the document. Not all respondents are individually referenced. However, a list of the respondent organisations has been included at the start of each chapter, appendix, or supporting document. A complete list of respondents can also be found at the end of this report.

### Number of comments received

Chapter/Document	Number of Comments
1. Introduction	11
2. Background	7
3. The Need for Strategic Distribution and Logistics and Site Criteria	23
4. Preferred Sites for Distribution and Logistics	47
5. Appendix A: Preferred Sites	22
6. Appendix B: Glossary	2
Supporting Evidence Documents	22

## Chapter One: Introduction

Comments on Chapter One: Introduction were received from the following:

Awsworth Parish Council, C Rochelle, D Rhead, East Leake Parish Council, Hallam Land Management, Harworth Group, House Builders Federation, Local Resident, Mulberry Land, Newark and Sherwood District Council, Ruth Edwards MP for Rushcliffe.

### Summarised comments from statutory organisations

Awsworth Parish Council raised a number of concerns about the preferred site allocation at the former Bennerley Coal Disposal Point (site BBC L01). These include some general points about the overall approach towards identifying potential sites summarised in Chapter 2, the lack of justification for Green Belt release at the Bennerley site summarised in Chapter 3 and site-specific comments on the former Bennerley Coal Disposal Point summarised in Chapter 4.

East Leake Parish Council commented that the authorities had not taken into account the Green Belt and historic sites. They also drew attention to the cancellation of HS2 to the East Midlands and queried whether the Park and Ride site (at Clifton) could cope with the number of employees.

Newark and Sherwood District Council support the approach taken by the Greater Nottingham Partnership Councils to identifying preferred sites and the two potential sites would significantly help meet future logistics needs in the Nottingham Core and Outer HMAs. Noting that Newark and Sherwood District Council is at a different stage in plan making to the Greater Nottingham Partnership, given the strategic nature of the logistics need it will be important for all the Nottingham Core and Outer HMAs to work together under the Duty to Cooperate (or successor Alignment Test) to ensure this particular issue is appropriately addressed.

Ruth Edwards, Member of Parliament for the Rushcliffe Constituency, stated that support for logistics or residential buildings on the Ratcliffe on Soar site, was subject to these uses being in support of the energy generation and advanced manufacturing priorities of the East Midlands Freeport as set out in existing plans for the site signed up to by Government and Rushcliffe Borough Council.

### Summarised comments from developers

Hallam Land Management noted that the preferred approach consultation document follows a wider focussed preferred approach earlier in 2023. The need to address strategic distribution and logistics employment land needs in addition to local general employment need is supported.

Harworth Group made essentially similar comments supporting the need to address strategic distribution and logistics employment need adding that the National Planning Policy Framework states that planning policies and decisions should recognise the specific locational requirements of different sectors including storage and distribution. The Planning Practice Guidance also recognises the critical role of storage and distribution in the local economy and contribution to local employment. They also highlighted the location of the Greater Nottingham area in the centre of the



country and that the need to respond to the needs of the logistics sector is of national importance.

The Home Builders Federation consider that the consultation highlights the need for the GNP to consider the interaction between employment and housing numbers. In this context, the HBF requests that the GNSP partners considers the annual local housing need assessment as the minimum starting point and fully consider all of the issues that may result in a higher housing requirement including additional housing need generated by additional jobs through strategic distribution. Noting the second preferred site is located within the Green Belt, the HBF would encourage the GNP to consider what other factors may constitute exceptional circumstances to release Green Belt such as the current housing crisis and inability of Nottingham City to meet its own need.

Mulberry Land made representations promoting their site northeast and southwest of Shilo Way, Awsworth.

### **Summarised comments from local residents**

A local resident made a number of comments and suggestions for amending various chapters in the document to promote sustainable transport and promote active travel making references to supporting aims of the NPPF and the D2N2 Local Cycling and Walking Infrastructure Strategy in this context. Another Local Resident welcomed the coordinated approach being taken towards planning for strategic distribution. A further local resident queried the purpose of the consultation.

#### **Councils' Response**

The Councils note that the overall approach to address the needs for strategic distribution and logistics facilities was supported by certain developers, Newark and Sherwood District Council and a local resident. In respect to the comments made by Newark and Sherwood District Council, the Councils welcome and commit to continue the close working to ensure this issue is addressed.

Awsworth Parish Council made a number of site-specific points about the Former Bennerley Coal Depot site which are addressed in Chapter 4. In respect of comments made by East Leake Parish Council, the Preferred Approach assessed sites against the full range of planning policies and constraints including potential impacts on the Green Belt and heritage. The Logistics Study is not predicated on HS2 being implemented.

In respect of Ruth Edwards MP (previously Rushcliffe MP) comments, the proposed allocation of part of the Ratcliffe on Soar Power Station site for strategic distribution and logistics for up to 180,000 sq. m. of strategic warehousing on land north of the A453 is consistent with the adopted Local Development Order.

In relation to comments made by the House Builders Federation, the Council consider that the labour supply arising out of the housing provision broadly matches with the employment forecasts set out in the Employment Land Study 2021.

#### **Changes Made**

None

## **Chapter Two: Background**

Comments on Chapter Two: Background were received from the following:

Awsworth Parish Council, D Rhead, Hallam Land Management, Hortons' Estate, K Boswell, Mulberry Land.

### **Summarised comments from statutory organisations**

Awsworth Parish Council submitted a number of representations to the various chapters of the consultation document. In general terms they raised concerns that there were insufficient details to assess the environmental impacts resulting from the construction and operation of a strategic warehousing development at the former Bennerley Coal Disposal site and are concerned that a decision to confirm this site for distribution and logistics use will be made in the absence of detailed information about the scale and impact of the development to make an informed decision. The Parish Council also consider that the former Coal Disposal Point land is being promoted because of potential for rail access and that the economic benefits are being given excessive and undue weight at the expense of several significant constraints. The Parish Council also questions the justification for removing this potential site from the Green Belt which is summarised in Chapter 3. Site specific comments made by Awsworth Parish Council are set out in Chapter 4

### **Summarised comments from developers**

Hallam Land Management quote NPPF paragraph 11 which states that strategic policies should as a minimum provide for objectively assessed needs for housing and other uses as well as any needs that cannot be met within neighbouring areas unless application of the policies in the Framework that protect areas or assets of particular importance provides a strong reason a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. The GNSP has stated it is not seeking to provide for identified housing need. It is therefore taking a different approach to meeting distribution in comparison to meeting housing needs and they object to what they consider is an inconsistent approach as it fails the positively prepared and consistent with national policy tests of soundness.

Hortons' Estates confirmed they has no comments on this chapter of the Preferred Approach.

Mulberry Land stated that there is no indication of how the need for distribution land has been split between the authorities and whether this figure has been agreed with Ashfield District, Mansfield District and Newark and Sherwood District Councils. They also considered that it is not made clear how the need of between 131-147ha is apportioned to Ashfield, Erewash, Mansfield and Newark and Sherwood.

### **Summarised comments from local residents**

A local resident suggested that new paragraphs reflecting the NPPF paragraph 104 – 113 covering sustainable transport. A further suggestion is to add a new section about active travel with reference to Department of Transport publications including Local Cycling and Walking Infrastructure Plans and Cycle Infrastructure Design.

Another local resident noted both preferred sites are at the western fringe of the study area and proposals should be coordinated with adjoining boroughs. Suggests the study area be extended west to confirm that there are no better options exist in adjoining authorities or those that may compete and affect viability for example Stanton Ironworks.

### **Councils' Response**

Hallam land Management along with a number of other Developers / Landowners consider that the approach is inconsistent with paragraph 11 of the National Planning Policy Framework. The Councils disagree and consider that the Strategic Distribution and Logistics Study is guidance and the Councils have sought through their Preferred Approach to meet as much of the demand assessed in the Strategic Distribution and Logistics Study as possible and allocated strategic sites in appropriate locations. The Councils consider the approach is consistent with paragraph 11b (i) that planning authorities should meet objectively assessed need for employment related development unless the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area. Such policies include land designated as Green Belt as set out in footnote 7 to paragraph 11 of the NPPF.

Regarding the point made by Mulberry and other developers about disaggregating the assessed need between individual local authorities, the study area and estimation of demand for strategic logistics provision extends well beyond the Plan Area. The Strategic Distribution and Logistics Study which adopts a "Policy off" scenario identifies a need for between 1,270,000 sq. metres to 1,486,000 sq. metres or 360 – 425 hectares of strategic distribution and logistics space. There is no accepted basis for disaggregating the estimated need between the constituent Councils. Rather the approach has been to meet as much need as possible in appropriate locations whilst taking into account constraints including in particular the Green Belt.

The Councils agree with the local resident about the need to promote sustainable and active travel and will address this matter in detailed policy wording for the proposed allocations. Sustainable travel will also be addressed at either the planning application stage or in the case of Ratcliffe on Soar Power Station the Local Development Order procedure.

In respect of the point made about extending the study area to the west, the study area includes Erewash Borough and takes into account the potential of the former Stanton Ironworks to contribute to meeting needs for strategic distribution and logistics facilities (now allocated as New Stanton in the Erewash Core Strategy).

### Changes Made

Detailed policy wording to be considered for promoting active transport.

## **Chapter Three: The Need for Strategic Distribution and Logistics and Site Criteria**

Comments were received on Chapter Three: The Need for Strategic Distribution and Logistics and Site Criteria from the following:

Ashfield District Council, Awsworth Parish Council, D Rhead, Environment Agency, GLP, Hallam Land Management, Harworth Group PLC, Hortons' Estate, Historic England, Knightwood Plc, Mansfield District Council, Mulberry Land, Newark and Sherwood District Council, North West Leicestershire District Council, Oxalis Planning, Richborough, Ruth Edwards MP, Severn Trent Water, The Gardens Trust, and Wilson Bowden.

### **Summarised comments from statutory organisations**

Ashfield District Council consider that the two preferred sites meet the residual need for strategic distribution and logistics are within the areas of opportunity identified in the Nottinghamshire Core and Outer HMA Logistics Study. They also state that within Ashfield the “pipeline” to meet the need for strategic distribution is the proposed site in the draft Ashfield Local Plan – Land East of Junction 27 M1 Motorway. It is expected that public consultation on the publication version (Regulation 19) of the Local Plan will take place from the end of November 2023 for a period of 8 weeks.

Awsworth Parish Council does not agree that this extensive area (Bennerley site) should be removed from the Green Belt by way of exception and not persuaded that sufficient justification has been demonstrated. Site specific comments on the former Bennerley Coal Disposal site made by the Parish Council are also summarised in Chapter 4.

The Environment Agency made site specific comments in relation to the preferred sites at the Bennerley Former Coal Disposal Point and the Ratcliffe on Soar Power Station Site and these are summarised in Chapter 4.

Historic England have raised concerns about the reference to a “policy off” approach in paragraph 3.4 of the consultation document where issues such as the historic environment were not considered at this stage. The NPPF Section 16 states that local plans must have a positive strategy for heritage with paragraphs 189, 199 – 203 setting out that heritage resource should be protected and enhanced. HE raises concerns about the proposal due to lack of available information about what is proposed at the site and what impact there may be on the significance of the Grade II Listed Bennerley Viaduct. A heritage assessment is required. HE notes that the Bennerley Viaduct is located within both Broxtowe Borough and Erewash Borough and that joint working may be required to ensure an appropriate outcome for the heritage asset. Noting the Council's view that development might potentially harm the significance of the asset and its setting they go on to state that they do not support the view that a heritage

assessment can be delayed to the planning application stage when the principle of development is being established in the Local Plan. HE raised similar points in connection with the Ratcliffe on Soar Power Station site and referred to earlier comments on the Preferred Approach held in February 2023. HE reiterates the need for a heritage assessment as there are a number of heritage assets on the Ratcliffe on Soar Power Station site that could be harmed including the presence of important archaeological remains. They do not support the approach that heritage assessments should be delayed until the planning application stage.

Mansfield District Council consider the evidence base to be up to date and appropriate to determining the approach to this topic within the Greater Nottingham Strategic Plan. The identification of sites for strategic distribution and logistics appears to have been based on a detailed assessment of the Areas of Opportunity and nine specific considerations. The proposed approach does not have any specific impacts on Mansfield District. Subject to detailed comments (relating to identified constraints and need for masterplanning to help address impact through mitigation), it is considered that the two sites identified are appropriate to meet identified need for this type of employment land within the Greater Nottingham Strategic Plan area.

Newark and Sherwood District Council stated that the Councils have correctly identified at paragraph 3.4 that the Logistics Study was undertaken from a “policy off” perspective and that the quantum of space estimated is not viewed as a target but guidance which must be seen in the context of other constraints.

North West Leicestershire District welcome the Partnership approach to addressing the requirements of the strategic B8 sector in terms of quantifying the need for additional land and by identifying sites. This is a growth area and pressure for land is considerable. However, after taking into account the two preferred sites there would be a shortfall of some 26-47 ha and suggest that this needs addressing by the Partnership as a priority. Site specific comments by this consultee in connection with the Ratcliffe on Soar Power Station site are addressed in Chapter 4.

Ruth Edwards MP for the Rushcliffe Constituency made comments solely in respect of the Ratcliffe on Soar site in relation to the evidence of need raising concern about paragraph 3.4 in that need was identified using a “policy off” approach when factors such as road capacity, constraints such as location within the Green Belt and existing plans for the identified and neighbouring sites are all of high importance in determining which sites should be taken forwards.

Severn Trent made site specific comments on the Bennerley Former Coal Disposal Point, and these are summarised in Chapter 4.

## Summarised comments from developers

### Need

Hallam Land Management referred to the Ratcliffe on Soar Power Station Site Local Development Order which has already identified parts of the site for B8 logistics so this proposed allocation is already counted in the pipeline and will not contribute to meeting the residual 131-147 hectares of need. The consultee also considers it highly unlikely that additional distribution and logistics sites may come forward within the Greater Nottingham Area and those other authorities within the study area. This is for two reasons, firstly because there is no requirement figure for each LPA; and secondly the allocation of further sites is likely to require Green Belt release the justification of which would be difficult to substantiate in absence of evidence that demonstrates a need for Green Belt release. To be found sound the GNSP should identify how it is seeking to fully meet logistics land needs.

Harworth Group stated that the consultation document proposes to allocate two sites to meet needs, including their client's site, Bennerley Coal Disposal Point and an area within the Ratcliffe on Soar Power Station site. However, the consultation document does not make it clear that the Local Development Order at Ratcliffe on Soar Power Station means this proposed allocation is already included in the pipeline sites and therefore will not contribute to meeting the 131-147 hectares of need. The remaining need is to be addressed through the proposed Bennerley Coal Disposal Point allocation and then the residual need through Part 2 Plans or the Local Plans of the Outer Nottingham area. In this context it is important that the full potential of the proposed Bennerley allocation is maximised to ensure this strategic cross boundary issue is addressed as fully as possible in the Strategic Plan, as the appropriate plan for this matter to be dealt with.

Hortons' Estate conclude that the figures identified in the Preferred Approach Consultation are too low. The figures are based on the lowest amount of new floorspace anticipated by the "market signals" model. Furthermore, a significant proportion of the anticipated supply relies on the recycling / redevelopment of existing sites, for which there is no evidence of certainty in delivery. Furthermore, the impact of the loss of recycled employment land on the supply of smaller sites has not been considered. The overall target should be increased substantially and that failure to do so would suppress growth in the Greater Nottingham area to the detriment of its future economic performance. They also comment on the very low density of development assumed for the Bennerley site (below the normally assumed 35% plot ratio) and outline multiple challenges to its development. In respect of Ratcliffe on Soar Power Station they calculate a development density of 5,000 sq. m being above the usual assumption of 3,500 sq. m per hectare. In conclusion they consider such a density would not be attractive to the market and if 35% plot ratio was used then the floorspace delivered would be 127,400 sq. m a further reduction when considered against need.

Iceni for GLP who are promoting land southwest of junction 25 of the M1, consider that remaining unmet need is in the region of 134.5 ha to 150.9 ha excluding Stanton North



which they consider should be discounted along with the two draft allocations in the Regulation 18 draft Ashfield Local Plan. Referring to paragraph 11 of the NPPF they consider that strategic policies should as a minimum provide for objectively assessed needs unless policies in the Framework provide a strong reason for restricting development or any impacts would significantly and demonstrably outweigh the benefits. Given this and the NPPF's requirement for plans to be positively prepared and to support economic growth they consider significant weight should be given to meeting the full objectively assessed need for strategic logistics. Iceni also raise serious concerns about the supply of potential logistics sites set out in the Strategic Background Paper Appendix 1. In this connection the consultee considers that the two allocations in the regulation 18 draft Ashfield Local Plan cannot be relied upon. Progress on the Erewash Stanton North site indicates reserved matters coming forward suggests lower if any contribution to strategic logistics will be brought forward. Iceni also mentioned that reference in the Preferred Approach to Stanton North being more than sufficient to meet Erewash's needs overlooks that the need for strategic distribution is a regional issue and by its nature a cross-boundary issue where need cannot be neatly apportioned to individual authorities. Iceni do not consider that otherwise suitable sites should be discounted on the basis of Erewash considering it is meeting its own needs.

Mulberry Land promoting land at Shilo Way, Awsorth made comments in respect of the analysis of residual demand set out in the preferred approach being 131 – 147 ha. They note that the two preferred sites total 104.4 ha which is in their view a long way short of the minimum need (26.6ha short). Mulberry Land calculate that using industry methodology of a 20,000 square feet per acre plot ratio then Bennerley site would result in a developable area of 16.1 ha. When combined with the 36.4 ha at Ratcliffe on Soar they estimate both proposed allocations would total 52.51 ha. Taking the Preferred Approach residual unmet need 131 – 147 ha and using the 131 ha as a minimum Mulberry applied the plot ratios of 35% and 40% giving a net developable area range of 45.85 ha – 58.8 ha. In their view there is a shortfall in the amount of floorspace proposed. In this context they consider that even at the higher end of the delivery scenario, the proposed allocations can only just accommodate this need, but this relies on the Councils delivering all of their pipeline and consented sites. They consider that some of these sites might never come forward for various reasons, some have only outline consent and the two pipeline sites in Ashfield are draft allocations and therefore cannot be relied upon. A range of additional sites is needed to bolster supply.

Oxalis, in relation to need, considered that the preferred approach fails to accord with the Government's requirement to identify strategic sites to meet anticipated needs and in this context the consultee refers to Government policy contained within the publication, The Future of Freight and the NPPF paragraphs 81 and 82. The Iceni study identifies a significant need for provision of strategic logistics and highlights the dire level of current supply. The Background paper includes the authorities' analysis of the residual strategic logistic need. Concerns are raised that the approach to these figures

is predicated on a desire to downplay the importance of meeting that need in full. Key assumptions made together with the judgements reached on the quality and suitability of existing supply is such that the level of residual need is lower than it would be if more balanced assumptions and judgements made. However, the residual figure identified by the authorities is significant and there is no sound explanation to justify such a shortfall. They also considered that an additional 10% should be added to the Iceni estimate of need to provide flexibility akin to a 10% additional housing buffer often applied to objectively assessed housing need.

Oxalis considered that a further 10 – 20% of supply coming forward from redevelopment sites does not appear to be reasonable. If it is assumed that 57,136 sq. m. of land will come forward on redeveloped existing employment land, then that loss to the general employment land should be planned for. Also refer to double counting issue raised by Iceni in their Study (paragraph 5.6). More specifically they consider that the supply assumed at the Former Horizon Factory should not count as new employment supply as this was existing employment land.

Wilson Bowden promoting land at New Farm Nuthall (BBC-L06) object to paragraph 3.5 which refers to the need for space being not viewed as a target but as guidance. In this context, the consultee refers to NPPF paragraph 11b which states that strategic policies should as a minimum provide for objectively assessed needs for housing and other uses which includes strategic employment. Consider that 425 ha identified in the Logistic Study should be provided as a minimum. Where other authorities bring sites forward then these should be considered at that time. Without clear evidence of why the 425 ha is not being met in accordance with the evidence base, this preferred approach has not taken full account of the reasonable alternatives and therefore not justified.

This consultee also refers to supply side deficiencies referring to the Logistic Study emphasising the supply gap for large scale employment units with vacancies reaching an all-time low of 0.3% in 2021 and that the same study recommends a 5% vacancy rate as the minimum. The Logistic Study also highlights that 75% of the existing stock is dated before 2000 and that historically Green Belt has thwarted delivery in the M1 junctions 25 to 27 area. Referring to NPPF paragraph 81 relating to creating conditions for business to thrive the consultee considers the market need for strategic employment should be given significant weight. In relation to residual needs there is little prospect of the remaining 63 – 79 ha being met by neighbouring authorities and this residual need should be dealt with now as part of the GNP to ensure needs are met in full. In this context the respondent states that the Areas of Opportunity are all within the GNP area focussed on the M1 with the exception of Newark. The consultee also raises concerns over the capacity of the Bennerley site to deliver the assumed quantum of floorspace quickly enough.

## **Green Belt and Exceptional Circumstances**

Hallam Land Management referred to the Green Belt Background Paper (December 2022) and notes at paragraph 7.7 that no Green Belt boundary changes are proposed but this was issued before the Preferred Approach to logistics sites that does propose Green Belt boundary changes and there is a need for a comprehensive Green Belt review to properly evidence the GNSP which should include consideration to identifying safeguarded land.

Iceni commented that whilst Green Belt might in some circumstances be considered a broad policy constraint that could potentially justify not meeting needs in full (as indicated by footnote 7 to paragraph 11 of the NPPF), the extent to which it poses a constraint should be considered carefully and reviewed in the context of the unmet need and the significant negative socio-economic consequences of failing to meet that need. Given Exceptional Circumstances have already been identified in principle in the Greater Nottingham Strategic Plan and in other emerging Plans to release Green Belt to meet identified needs, they do not consider that this would pose an in-principle constraint to identifying additional land across the HMA to meet specific needs.

Oxalis commented on Green Belt issues as summarised: the authorities have implied there are overriding environmental/policy objectives why identified needs cannot be met in full. The Greater Nottingham Growth Options Study identified broad areas with high potential for growth and specific areas were deemed suitable for development including south of Fairham. The NPPF (paragraph 140) states that Green Belt boundaries should only be altered where exceptional circumstances have been fully evidenced and justified. This includes evidence of strategic logistic need, the Lichfields Employment Land Study and the Greater Nottingham Growth Options Study. It is clear that reasonable alternative non-Green Belt options do not exist for meeting strategic logistics need. In accordance with the NPPF there is no justification for identified needs not to be met in full, with additional land identified for flexibility.

Wilson Bowden agree that the Councils' approach of seeking to allocate previously developed sites is in line with the requirements of NPPF Paragraph 141a, however, they object to the overall approach because the identified residual unmet need of 63 – 79 ha should be met through the allocation of sufficient land in this Plan. Given the lack of land outside of the Green Belt which is available and suitable to meet strategic employment needs, it is considered that Green Belt land is released to accommodate this unmet residual need in the right location to support market needs and ensure that the plan provides for the objectively assessed need.

## **Site Selection Criteria**

Boyer Planning on behalf of Richborough promoting land at the Edwalton Triangle, Knightwood Developments for land south of the A 52 at Whatton and for Mattock and Herrick in relation to land at Jericho Farm disagree with how these sites has been assessed in the context they were eliminated at Step 2 of the site selection process

from further consideration. The consultee considers the sites meet a number of the criteria and in the case of the A52 Whatton and Jericho sites are of a strategic scale being over 25 hectares. Boyer Planning made comments on site selection criteria in particular rail freight connectivity. They referred to the site selection criteria as adhering to the Nottingham Core and Outer HMA Strategic Distribution Study with the exception of rail freight access. There is no mention of rail freight connectivity requirements in the selection methodology at Step 2. The aforementioned Logistics Study required sites to be close to the strategic road network. The GNP has viewed this as a desirable criterion due to the aims of the Department of Transport's Decarbonising Transport – A better, Greener Britain Report but this is a topical paper and holds no weight. The Strategic Background Paper appears to consider that the ability to connect to the rail network a significant advantage, however, the evidence base in the form of the Nottingham Core and Outer HMA Strategic Distribution Study suggest otherwise, and market demand does not reflect the need for further Strategic Rail Freight Interchange in the East Midlands.

Iceni were concerned that given the omission of their site (EBC-L02 land south-west of Junction 25 of the M1) from the original assessment that this may have prejudged the conclusions of the Step 3 assessment.

Oxalis promoting land adjacent the A46 east of Cotgrave sets out details of objections in relation to the identification of need and lack of allocations to meet those needs. Whilst the site lies outside of the “areas of opportunity” the site is considered by the consultee to meet the other relevant criteria and should therefore be considered in the same way as other sites identified by the Council as part of the strategic logistic supply. Oxalis also considered that the majority of sites identified in the supply (identified in Appendix 1 of the Strategic Distribution background Paper) fail to meet one or two of the site selection criteria and provided details. In this context, Oxalis considered that the following sites did not meet the minimum size criteria (25 hectares): Castlewood Business Park (planning references V/2018/0652 and V/2021/0362), West of Fulwood (allocation EM1Sb), Land off Brunel Drive (reference 21/02/408/FUL), Blenheim Lane (21/02346/REM), South of Clifton (14/01417/OUT), North of Bingham (allocation), Junction 27 North East (draft allocation), Junction 27 South East (draft allocation). In addition, Oxalis considered that the following did not meet the minimum size criteria or transport connectivity criteria: Harrier Park (allocation), Penniment Farm (2017/0572/RES), Former Horizon Factory (reference 18/01455/POU) and RAF Newton (22/011468/REM). In relation to Stanton North, Oxalis considered this does not have appropriate transport connectivity. In connection with land at Stephenson Way Oxalis considered that there was no remaining land suitable for strategic logistics.

Wilson Bowden refers to the Logistics Study (paragraph 10.12) recommending a sequential order for site selection as follows: extension of existing distribution sites; followed by PDL sites; and finally new greenfield sites which meet the site selection criteria. There are a number of sites which meet the preferred sequence being adjacent

to an existing employment site; are sustainably located and could be extended. This is not justified and is not an appropriate strategy based on the evidence provided.

### **Summarised comments from other organisations**

The Gardens Trust raised site specific concerns about the Ratcliffe on Soar Power Station site which are summarised in Chapter 4.

### **Summarised comments from local residents**

A local resident suggests amendments to paragraph 3.15 "whether the site is ... EITHER accessible by current active travel infrastructure OR could feasibly be made accessible by future active travel infrastructure -- to be completed before the distribution/logistics facility "opens for business" -- to be funded by "developer contributions".

#### **Councils' Response**

The Councils note that Newark and Sherwood District Council agree that the quantum of space estimated is not a target but guidance which must be seen in the context of other constraints. In relation to the comments made by North West Leicestershire the study area extends beyond the Greater Nottinghamshire Partnership Area and the issue of meeting any residual need will be explored through the Duty to Cooperate. However, the Greater Nottinghamshire Partnership has sought to meet as much of the identified need as possible given the various constraints. The comments of Mansfield District in relation to the evidence base being up to date, a sound methodology and appropriateness of the proposed sites at Bennerley and Ratcliffe on Soar is welcomed.

In relation to the points made by Historic England, it is not possible at this stage to undertake a detailed heritage assessment as the exact design and layout of the proposed storage and distribution facilities is unknown. It is quite usual for strategic plans to leave detailed planning considerations to be addressed at the planning application stage. A heritage assessment will need to accompany any proposals at the site.

In response to Ruth Edwards (previously Rushcliffe MP), the reference to the study being "policy off" in paragraph 3.4 of the Preferred Approach is to the Strategic Distribution and Logistics Study carried out by consultants with a perspective to consider the market demand and operational needs of the distribution sector in an unconstrained way. For clarification the Preferred Approach to site selection has considered sites against the full range of planning policies and constraints.

#### **Need**

Developers argued that the Councils' assessment of need is too low and that the Councils were downplaying the importance of the distribution and logistics sector to the economy. The Logistics Study identifies a range of between 1,270,000 sq.

m. to 1,486,000 sq. m. with the upper end of this range favoured by the consultants for planning purposes. The higher end of the range equates to 425 ha and the bottom of the range 362 ha. This figure represents a scenario of increased delivery of the market relative to Nottinghamshire (including Bassetlaw) and Leicester and Leicestershire in an unconstrained way. The Council consider the Policy off estimates by Icenl to be guidelines but nevertheless are planning for a significant increase in market share in relation to a market that extends well beyond the Plan Area and make provision to meet market demand for large scale distribution facilities that is relatively footloose.

Mulberry referred to the use of an industry standard plot ratio of 20,000 square feet to the acre which would result in the Bennerley site achieving a net area of 16.1 ha. The Councils have reviewed the Bennerley proposed allocation and now estimate the capacity of the site to be 124,500 sq. metres on 61 ha. In general, the Councils have used the plot ratio of 0.35 as set out in the Strategic Distribution and Logistics Study as a proxy for estimating residual land needs once supply has been taken into account using actual planning permissions for floorspace granted where relevant. The Councils acknowledge that there will be a residual shortfall once supply and the proposed allocations are taken into account.

The importance of strategic distribution and logistics to the local economy is recognised as evidenced by the Councils commissioning a specialist Strategic Distribution and Logistics Study and has sought to meet as much of the demand assessed as possible and allocated strategic sites in appropriate locations.

A specific query was whether the potential supply of land at Ratcliffe on Soar would meet the residual need for 131 – 147 ha set out in the Strategic Distribution and Logistics Study as this site was already accounted for in the “pipeline” supply. It is acknowledged that the site has been counted as potential pipeline supply in both the Strategic Distribution and Logistics Study and the Strategic Distribution and Logistics Background Paper.

Certain developers (Hortons and Oxalis) objected to the assumptions used for the potential from the redevelopment of existing employment sites coming forward which could make up between 10 – 20% of residual demand as there was little evidence to support this and that such losses to the general supply of employment land should be planned for. In response the Councils refer to the findings set out in the Strategic Distribution Study at paragraph 10.16 which considers this a reasonable assumption. The examples given include Sherwood Business Park, New Stanton and Ratcliffe on Soar. A further example would be the redevelopment of the former Imperial Tobacco Horizon Factory on Thane Road, Nottingham now redeveloped as Power Park - a distribution hub.

Turning to the point about compensating for losses, the change of use / redevelopment of employment sites with an employment end use does not

constitute a loss of employment land. However, the “loss” of employment land to other non-employment uses has been factored into the assessment of general employment land need as set out in the Employment Land Study (Litchfields 2021). The assumption that between 10 – 20 % of potential demand for strategic distribution space being met from redevelopment opportunities results in a fairly modest range of between 16 ha and 33 ha coming from this source as set out in Appendix 4 of the Strategic Distribution and Background Paper. The identified supply of strategic distribution sites and units greater than 9,000 sq. metres within the Plan Area has been deducted from the general supply of industrial and warehousing land. In all 123.5 ha has been discounted from the general supply of employment land which after taking into account this reduction is estimated at around 173.5 ha against a need of about 113 ha (more details are set out in the Employment Background Paper supporting the Publication Draft Greater Nottingham Strategic Plan). Going forward there is more than enough supply of general industrial and warehousing land to provide flexibility in this context.

The Councils consider that the redevelopment of the former Imperial Tobacco Horizon Factory is in effect new supply and should be accounted for in the supply of strategic distribution and logistics sites but is not included within the general supply of industrial and warehousing land.

### **Warehousing supply**

Developers argued both for and against the inclusion of sites of less than 25 ha in either the supply or in terms of meeting future needs. Mulberry Land made the point that site size is not totally relevant in that it is the proposed floorspace of a unit capable of being accommodated that matters most. This point is generally accepted as smaller sites can contribute towards the need for strategic distribution facilities and taken into account in the independent consultant’s Strategic Distribution and Logistics Study. However, for the purposes of allocating new sites, the Councils have followed the recommendations set out in the Strategic Distribution and Logistics Study that sites for allocation should be large – around 25 hectares and sufficiently large and flexible in configuration so it can accommodate the range of sizes of distribution centre warehouse units.

Developers raised general issues about the quantity and quality of the estimated supply of strategic warehousing. It is stressed that the supply of strategic warehousing is based on the findings and assumptions used in the Strategic Distribution and Logistics Study. This supply was updated for the purposes of the Preferred Approach Consultation in November 2023 and has since been revisited. For the Publication GNSP. Developers argued that a number of these sites did not meet the site size criteria of 25 ha and above, however, units of 9,000 sq. m of more or sites with potential to accommodate such large-scale units were included as part of the methodology employed by Icen. In this context, it is noted that the significant levels of supply identified in the Strategic Distribution and Logistics Study is being delivered. This includes sites within the Castlewood Business Park

in Ashfield District, Fairham Business Park in Rushcliffe Borough and Power Park in Nottingham. Progress is also being made at New Stanton where following outline planning permission, reserved matters applications have been approved for the first distribution units and construction on the first of these units now started. In total it is estimated that well over 100,000 sq. metres of warehousing space has been delivered since the publication of the Strategic Distribution and Logistics report August 2022.

Good progress is also being made in terms of progressing planning applications with new permissions granted including reserved matters. In terms of draft allocations identified in the Strategic Distribution and Logistics Study land in the vicinity of M1 junction 27 has been progressed as it is now allocated in the Regulation 19 Publication Draft of the Ashfield Local Plan which has now been submitted for independent examination. New supply not included in the Strategic Distribution and Logistics Study has also been identified with land off the A17 at Coddington near Newark upon Trent has been permitted on appeal.

Comments on the suitability of Bennerley and Ratcliffe on Soar Power Station are set out in sections below.

The Councils have reviewed the supply including the sites identified in the Strategic Distribution and Logistics Study and consider that the assumptions used are proving robust. The assessment is set out in the Employment Background Paper Appendix 2 supporting the Publication Draft Greater Nottingham Strategic Plan. However, land at Stephenson's Way Newark on Trent no longer forms part of the potential supply across the Strategic Distribution and Logistics Study Area as it is accepted that the scale of land available and site configuration is not suitable for strategic warehousing.

This review has identified new supply identified over and above that assumed in the Strategic Distribution and Logistics Study such as the Coddington site near Newark upon Trent and land at Lowmoor Road, Kirkby in Ashfield as a new allocation in the submission version of the Ashfield Local Plan and capable of accommodating a large distribution unit. As stated above, the Councils have sought to identify as much land for strategic distribution as possible given environmental constraints and policy constraints particularly the Green Belt. The Councils consider that there is a strong likelihood of additional supply coming forward within the wider market area beyond the Plan Area.

### **Site Selection Criteria**

The Iceni study is guidance and has been undertaken from a "policy off" perspective. It is within the remit of the Councils to consider relevant planning policies not covered in the Iceni Study. However, the Councils have not made the absence of rail connectivity or potential rail connectivity a "showstopper", the ability to connect to the rail network or potential for this would be a significant advantage



when determining which sites are preferred at Step 4 – selecting preferred sites. This is consistent with the Government's commitment as set out in the Department for Transport's plan to reduce emissions from transport called Decarbonising Transport - A Better Greener Britain which commits to support and encourage modal shift of freight from road to more sustainable alternatives, such as rail, cargo bike and inland waterways.

For new site allocations the initial sieving exercise gave consideration to whether the site is in proximity to Areas of Opportunity amongst other criteria. Sites that did not meet this criterion were not shortlisted for further consideration.

Site specific points including those made by the Environment Agency, Awsworth Parish Council and Severn Trent are considered in sections below.

### **Green Belt and Exceptional Circumstances**

Developers consider that the need to meet what they refer to as the objectively assessed need for strategic warehousing provides the justification for claiming the exceptional circumstances to alter the Green Belt boundaries have been met.

The Councils disagree, it is reiterated that the assessment of need set out in the Strategic Distribution Study is guidance. The Strategic Distribution Study sets out a number of scenarios to gauge future space requirements for distribution and logistics space using different methods as there is no accepted standard method. The recommendation is towards the higher end of the range which would represent a considerable uplift relative to Nottinghamshire (including Bassetlaw) and Leicester and Leicestershire in an unconstrained way. The Councils approach is consistent with the advice in the NPPF paragraph 11 that planning authorities should meet objectively assessed need for employment related development unless the application of policies in the NPPF that protect areas or assets have particular importance provides a strong reason for not doing so. In addition, paragraph 145 of the NPPF outlines it is a policy choice for authorities who may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. There is no compulsion to alter Green Belt boundaries to meet unconstrained need and in any case the Councils do not consider there are exceptional circumstances to alter Green Belt boundaries in this case.

### **Changes Made**

Remove land at Stephenson's Way, Newark on Trent from the estimated supply.

## **Chapter Four: Preferred Sites for Distribution and Logistics & Appendix A Preferred Sites**

Responses received on Chapter 4 and Appendix A have been combined as these both comprise comments on the suitability of the Preferred Sites at Bennerley and Ratcliffe on Soar.

*Site: BBC-L01 Former Bennerley Coal Disposal Point*

Comments on the Former Bennerley Coal Disposal Point were received from the following:

Nottinghamshire County Council, The Environment Agency, National Highways, The Coal Authority, Historic England, Natural England, Nottinghamshire Wildlife Trust, Severn Trent Water, Awsworth Parish Council, Derbyshire County Council, Mansfield District Council, Amber Valley Borough Council, Sport England, Chetwynd: The Toton and Chilwell Neighbourhood Forum, Harworth Group, R Salmon, Hortons' Estate Limited, Wilson Bowden Developments, Knightwood Developments Limited, Mulberry Land, Richborough Estates, Peveril Securities Limited & Omnivale Pension Scheme, Severn Trent Green Power, Openreach, Pedals (Nottingham Cycling Campaign), K Boswell, and D Rhead.

### **Summarised comments from statutory organisations**

Nottinghamshire County Council notes that 4.3 states '*Highways access to the M1 (Junction 26) is via the A610. Access to the site should only be from the A610*'. They state this is only possible if a bridge is to be provided across the A610 – which will not be the case. They therefore request that this reference is removed, as it also contradicts the statement within Appendix A which reflects the County Council advice that access should be via the existing access on the A610 and the roundabout junction on Shilo Way. They request that the “off-site” highway impacts should be determined as part of any future Transport Assessment that should include Giltbrook Interchange. They note that the site boundary does not include the entry/exit slips off the A610 as shown on the OS Map within Appendix A which is assumed a drafting issue and requests for these to be added.

In respect of minerals and waste, Nottinghamshire County Council identify that the site is located within the Mineral Safeguarding Area for coal and is also identified as being a high-risk development area owing to extensive local historic shallow coal workings. The County Council recommends the Coal Authority is contacted for further discussions about the site. The site surrounds the active Newthorpe Sewage Treatment Works. and recommend that the operator of the sewage works, Severn Trent Water, be contacted for comment on the preferred site.

In respect of heritage, Nottinghamshire County Council state that the site has designated heritage issues that require full and proper investigation to establish the nature and levels of harmful impact and whether these can be mitigated. This site wraps around, and to all intents and purposes includes the grade II\* listed Bennerley Viaduct. There has been no evidence presented, in the form of indicative designs, mitigation strategies, LVIA or suitable Heritage Impact Assessment work that could confirm that the 'benefits outweigh the harm'. In the absence of proper, thorough expert analysis of each issue, including the impacts on the setting of Bennerley Viaduct it is not possible to demonstrate that this assertion is correct (that the 'benefits outweigh the harm').

The Environment Agency state that, in respect of flood risk, large parts of the site are at risk of flooding from the Gilt Brook and River Erewash. The south-western part of the site is within Flood Zone 3b (functional floodplain) and only essential infrastructure and water compatible development should be located in this part of the site. They advise that, as the site straddles the Gilt Brook, which is an ordinary watercourse, the Lead Local Flood Authority should be consulted. Additionally, due to the interaction with the larger River Erewash, the applicant should develop a hydraulic model for the Gilt Brook to ensure flood risk is fully understood. The Environment Agency has recently taken receipt of a new River Erewash model, and this should be available from 2024 onwards. They advise that a sequential approach should be taken to the site layout by directing development to the areas of lowest flood risk. The re-development of this brownfield site presents an opportunity to reduce flood risk downstream and the applicant should explore opportunities to reduce flood risk to the wider catchment where possible.

In respect of fisheries, biodiversity and geomorphology, the Environment Agency state that they hold protected species records on site and adjacent to the site including many water vole records, which may still be present. Other protected species have also been recorded within close proximity to the location (within 1km), including adder, common lizard, grass snake, hedgehog, brown hare, badger and slow worm which would need to be taken into account. They suggest conditioning that surveys are conducted, and a protection plan created, particularly for water vole, as a species that the Environment Agency lead on. American mink has been found present and so a conservation management habitat protection plan for water vole would be encouraged. Other important species such as common toad, dingy skipper & small heath and grass snake are found within the proposed site, demonstrating the habitat's importance to several taxonomic assemblages. They highlight the Local Wildlife Sites within the boundary of the site, adjacent to the site or in the wider area and state that these sites should not be adversely impacted, and that development could enhance the condition of these sites through the delivery of 10% biodiversity net gain or greater.

In respect of groundwater and contaminated land, the Environment Agency refers to the potential for contamination and pollution which would need to be addressed including through pollution prevention measures within the surface water drainage solutions.

National Highways state that as the site does not share a common boundary with the Strategic Road Network (SRN) and will be accessed from the local road network, they

have no objections in principle to this proposed site. However, as the development plan progresses, their principal interest will be in understanding the traffic impacts associated with this allocation (and cumulatively with other developments) and ensuring that any unacceptable impacts on the SRN are appropriately mitigated.

The Coal Authority state that there are recorded coal mining features at surface and shallow depth which may pose a risk to surface stability and public safety. The Coal Authority are pleased to see acknowledgement that the site lies in the defined Development High Risk (DHRA). Any formal submission for development proposals within the DHRA should be supported by a Coal Mining Risk Assessment.

Historic England state that they have concerns about the proposal due to the lack of available information about what is proposed at the site and what the level of harm may be to the significance of Grade II\* Bennerley Viaduct. A heritage assessment is required to understand what the proposal is, how the significance of the heritage asset will be affected by the proposal, including its setting and how the proposal site contributes to the significance of the heritage asset. When this information is available the assessment will then be able to consider if there are any avoidance/mitigation measures to reduce the harm, if there are any potential enhancement opportunities such as heritage tourism and then the Councils can assess whether there are public benefits which outweigh the identified harm. Depending upon the outcomes of the heritage assessment, either the site should be removed from the Plan, or a site-specific policy prepared to list the planning considerations (including such issues as height/materials/massing/screening/watercourses etc.) and a Masterplan approach required. The Plan should be clear about whether there are reasonable alternative sites that do not harm the historic environment. As the Bennerley Viaduct Grade II\* is within the Borough boundaries of both Broxtowe Council and Erewash Council, joint working may be required to ensure an appropriate outcome for this heritage asset. They do not support the view that a heritage assessment can be delayed to the planning application stage when the principle of development is being established through the Local Plan.

Natural England advises that Green and Blue Infrastructure should be considered at the outset of any development in this location. The site is within the River Erewash Valley which is a recognised green infrastructure corridor within the Draft Greater Nottingham Blue-Green Infrastructure Strategy and the adopted Local Plans (part 2) for both Broxtowe and Erewash councils. They recommend that a GI corridor is retained and enhanced alongside the River Erewash with green connectivity throughout the site. The Erewash River corridor is an important pathway for nature and contributes to the wider Nature Recovery Network. The site itself also includes both deciduous woodland and open mosaic on previously developed land which are included in the Priority Habitats Inventory. These priority habitats should be protected and enhanced and where possible linked together to improve ecological connectivity. Details of how Biodiversity Net Gain would be provided for this potential development would also need to be considered. Ideally this should be provided within the site boundary or within the immediate surrounding area to provide maximum benefit for both nature and people.

Nottinghamshire Wildlife Trust object to the inclusion of this site. They state that they consider it is impossible to design the development to adequately address the constraints as it is unlikely that direct impact (loss of a Local Wildlife Site (LWS)) would be avoided because approximately 20ha of this proposed 68ha site (30%) is within the LWS. They state that the loss of a LWS in Broxtowe is unacceptable. The LWS is selected on Botanical, Moth, Butterfly, Odonata, Amphibians and Reptiles criteria, so has significant wildlife interest. The grasslands are highly likely to qualify as priority habitats at county and national level (Section 41 NERC Act), qualifying as lowland wet grassland toward the river or Open Mosaic Habitat on Previously Developed land. If the site was to be taken forward, a full Ecological Impact Assessment, including detailed surveys for range of flora and fauna (bats, birds, riparian mammals, invertebrates, herpetofauna) would be required. Furthermore, a development of this scale will have significant 'off-site' impacts, through noise, lighting, changes in hydrology and other disturbance mechanisms. The habitats present support protected species, such as bats, great crested newt, otter and water vole. Many of these species are mobile and features likely as part of the development (e.g. gully pots, traffic, lighting) will adversely impact on the favourable conservation status of these species. They state that options to 'avoid' impact must be considered first, in line with the 'mitigation hierarchy and the National Planning Policy Framework. In the event of the site being taken forward, in addition to mitigation on species, habitats and LWSs, the proposals would need to deliver BNG of at least 10%, in line with the emerging county-wide framework.

Severn Trent Water note that sections of this site are at risk of flooding from the River Erewash and from surface water (1-in-30) and, whilst the owner(s)/promoter(s) state that flooding risk can be easily managed using SuDS, it would be beneficial to understand if the impact of climate change has been considered in any flood risk management for the site. With the site being located near to the River Erewash, it would be expected that surface water could be drained directly to the watercourse. Discharging to the sewer network would likely result in a high(er) potential risk rating due to the sewer network in this area being a combined system. They state there are 'Very High' Watercourse constraints for the Newthorpe Sewerage Treatment Works. They recommend policy wording is included in the Plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy. SuDS policy wording and supporting text is also proposed, as is policy and supporting text for Blue and Green Infrastructure, Protection of Water Resources, Water Efficiency and Green Open Spaces policies.

Derbyshire County Council state that a key concern with the site is that the proposed site would be located within the Green Belt. In 2006/7, Derbyshire County Council and Nottinghamshire County Council jointly carried out the Review of the Nottingham – Derby Green Belt which identified the area of Green Belt between the two urban areas of Derby and Nottingham as being the most strategically important areas of the whole Green Belt in meeting the main Green Belt purposes, particularly in preventing the uncontrolled sprawl of the two urban areas and preventing the coalescence of the urban areas with each other and the towns in between in Amber Valley, Erewash and

Broxtowe. The proposed Bennerley site is located within a narrow strip of Green Belt that particularly helps prevent the coalescence of the settlements of Ilkeston and Cotmanhay in Derbyshire with Eastwood and Awsworth in Broxtowe Borough in Nottinghamshire. Development of the site must be justified in terms of demonstrating that exceptional circumstances exist to Green Belt policy and that other potential alternative sites have been fully explored and assessed to meet the identified need that may have less or no impact on other areas of Green Belt land. Design, layout and siting of the proposed development and associated landscaping will also be important considerations in mitigating the potential impact of the proposed development on the openness of the Green Belt. The other key cross-boundary concern may relate to the impact on the local highways network, particularly the A610 to the north of the site, which runs into the Derbyshire administrative area to the north-west.

Awsworth Parish Council has raised significant concerns about the proposed allocation. They raise concerns that this is not a meaningful consultation, and that reference has not been made to the adopted Neighbourhood Plan. They state that the proposal is contrary to the Neighbourhood Plan County Park aspirations. They are concerned that the economic benefits combined with the potential for rail connection are being given excessive and undue weight at the expense of several significant constraints, including: Green Belt (insufficient justification for removal of land from the Green Belt); landscape and visual amenity; harmful impacts upon the restored Grade II\* listed viaduct (both upon the structure and its setting); flood risk; and three Local Wildlife Sites within the site and one within 250m. They query whether parts of the site will be developable and whether the land proposed for allocation is too large. They also raise significant concerns regarding additional traffic through the village and that it is imperative that road access should be restricted to the existing A610 access. They are concerned that accessibility to the site by public transport is poor. They are also concerned regarding noise and disturbance. They refer to conflicts with the policies of the adopted Awsworth Neighbourhood Plan, including Policy BV 2 and Policy GI 2, BV 1, BCP 1, (in relation to the Bennerley Viaduct and Former Coal Disposal Point), GI 1 (Green and Blue Infrastructure), TT 3 (Sustainable Transport) and GI 3 (Biodiversity). They express concerns in relation to potential harm to biodiversity including protected species. Should the proposed Preferred Approach to allocate land at Bennerley for Strategic Distribution and Logistics be confirmed, it will be imperative that significant community benefit should be delivered alongside the purely economic benefits 'which is the main driver behind this proposal'. They contend that some of the land owned by Harworth (and shown within the red outlined areas) should be allocated and developed as a 'Country Park'.

Mansfield District Council note that the proposed allocation has a number of constraints. To help address / mitigate the issues that will occur, it is recommended that, if the site it is allocated, a masterplan / design code should be prepared.

Amber Valley Borough Council state that, whilst acknowledging the proximity of the proposed site to junction 26 of the M1, they would expect to see consideration given to the impact and required mitigation on road infrastructure in Derbyshire, particularly the

A610 in a north-westerly direction towards the urban areas of Heanor, Langley Mill, Ripley, the A38 and the wider road network. This is in terms of traffic movements generated by users of the site and by employees travelling to the site. The location of the site will also draw on the accessibility of labour supply within Amber Valley, especially from the urban areas of Heanor and Langley Mill. Any allocation should ensure proposals deliver sufficient public transport infrastructure and walking and cycling routes to and from these settlements to reduce dependence on car journeys and mitigate further congestion within the local area.

Sport England note that there are two playing fields located adjacent to the boundary of site BBC-L01: Former Bennerley Coal Disposal Point. The playing fields are located to the north and south-east of the site. The inclusion of reference to these playing fields within the site information would be welcomed to ensure any potential impacts are considered and mitigated as proposals are developed.

Chetwynd: The Toton and Chilwell Neighbourhood Forum state that the two preferred sites lie outside of the Forum Area and do not directly impact it. However, the environmental, heritage and archaeological value of the two sites should be respected, and as much preserved of these assets as possible.

### **Summarised comments from developers**

Harworth Group support the allocation of the site. They refer to wider benefits to the local area, particularly through employment opportunities and wider investment. They refer to the high standard of vehicular access off the A610 which would provide access for HGVs. They also refer to an opportunity for an access from Shilo Way on the eastern boundary of the site which could provide access for non-HGV vehicles. The accessibility to nearby settlements and provision of public transport, walking and cycling routes is referred to. Reference is also made to an existing rail spur from the Midland Mainline which runs into the site with the potential to provide a rail freight interchange point and could remove freight vehicles from the roads.

In respect of Green Belt, they consider that there are clear exceptional circumstances that justify the site being allocated for employment uses and removed from the Green Belt, particularly in the context of the wider regeneration opportunities it offers. They consider that, with careful design, the site can be developed in a way that would not harm the purpose or function of the Green Belt to the west of Awsworth. They state that they will work with the Council to ensure any potential impacts on flood risk, heritage and biodiversity are appropriately mitigated. It is stated that the site layout offers the opportunity to deliver a range of unit sizes which could include both strategic scale distribution and logistics employment units through to starter units if these are required to support local employment needs. The site is located adjacent to the Bennerley Viaduct. They consider that the development of this site would bring significant local regeneration benefits, complementing the planned improvements and significantly improving the context of this Grade II\* listed heritage asset. Reference is made to

Harworth specialising in complex and often former industrial sites and transforming them into sustainable industrial & logistics developments.

They state that the current boundary includes an area of flood risk which could be excluded from the site and replaced with land which is not at risk of flooding adjacent to the access point from the A610 which is more suitable for development. The site boundary could also be refined to pull it away from the foot of the Bennerley Viaduct to reflect proposals for a Visitors Centre.

R Salmon states that, although the site has a rail head and good road access, it will require considerable future work to minimise major flooding and drainage issues before it can be used as a logistics site. The suitability of an alternative site (BBC-L08) is made, including its location and lack of significant constraints.

Hortons' Estates Limited highlight the very low density of development due to the significant site constraints. They state that there will be significant infrastructure works required to service the site which will require extensive costs and extensive remediation will also be required. Therefore, they think there are significant doubts regarding the deliverability of the site during the plan period.

Wilson Bowden Developments consider that there are a number of sites (including New Farm, Nuthall) which are located adjacent to existing employment sites, are sustainably located and could be extended to meet this need. In respect of the site at Bennerley, they question the assertion that the site will be able to deliver 74,000 sq. m. of large-scale employment floorspace early in the plan period, given its irregular shape and the likely presence of contaminants relating to the site's former use as a coal disposal point. They also question the drainage capabilities of the site. They refer to a critical mass of development being required to make the road and rail access viable and question whether any feasibility studies have been prepared to support the site's allocation and confirm that the site is deliverable. They also question whether there is heritage-led evidence to support the introduction of major logistics and distribution development in the setting of the viaduct.

Knightwood Developments Limited and Richborough state that no feasibility or viability work has been undertaken in relation to rail access. They highlight the site constraints including the viaduct and flooding. They state that a full Green Belt review should be undertaken and that non-Green Belt sites should be considered more favourably in order to meet the shortfall in land supply, where these sites connect well with the potential for housing development. The feasibility of the proposed access arrangements and the impact of development on open space, flooding, heritage, landscape, visual impact and on local wildlife sites are also questioned.

Mulberry Land highlight that their site at Shilo Way, Awsworth could come forward jointly to provide a comprehensive area of employment land to address the need. They state that the proposed allocation at Bennerley Coal Disposal Point presents a very convoluted land area, bisected by a watercourse and that, if the site will only be accessed from the A610 to the north of the site, just this northern parcel of the site may be delivered.



Peveril Securities Limited & Omnivale Pension Scheme state that there are potential significant barriers to the delivery of the site due to it being a longstanding brownfield site which has naturally regenerated itself with a wide mosaic of vegetation and has likely ground contamination, road access, flood risk, heritage and rail freight infrastructure issues. They state that this raises doubts as to the timing of the site's delivery, its viability and the extent of the land available to accommodate distribution and logistics development. They refer to issues relating to accessing the site, the impact on biodiversity and question the feasibility of the rail access. They also question how the site has been assessed in respect of flooding, also referring to recent flooding which has taken place on the site.

### **Summarised comments from other organisations**

Severn Trent Green Power (STGP) state that part of the allocation lies within 100m of STGP's wind turbine which is located adjacent to the Severn Trent Water (STW) works. It is noted within the draft allocation wording that the wind turbine is not identified as a constraint to development. However, STGP considers it is imperative that the presence of the wind turbine is referenced within the allocation and that there should be a minimum distance of at least 500m between the wind turbine and any new built development, in order to minimise the potential for impacts from the existing wind turbine (such as noise or shadow flicker) being experienced by any new commercial receptors. They consider that the part of the allocation which is nearest the wind turbine and appears to follow the hedge line in-between the wind turbine and STW works should be removed from the allocation. It is considered to be too close to the wind turbine (within 100m) to be developed, and its use would be impractical given its configuration with the existing adjacent land uses.

Openreach, in respect of full fibre infrastructure, state that for commercial/retail developments then the full fibre network will be available to provide either FTTP broadband or faster circuits if the owner/tenant requires this.

Pedals (Nottingham Cycling Campaign) state that they fear that a new distribution and logistics development sited on the former Bennerley Coal Disposal site just north of the Viaduct would be detrimental to the views and amenity of users of this major and increasingly important heritage and tourist attraction. Usage is likely to increase further with the completion of the new eastern ramp and the new Visitor Centre, to be followed also by improved connections further east, all coordinated by Broxtowe Borough Council and the Friends of Bennerley Viaduct, with support from Sustrans and Pedals.

### **Summarised comments from local residents**

A resident considers that hazards and opportunities associated with the former (infilled) Nottingham canal that runs through this site have failed to be identified and the cost of remediation could be significant. They consider that restoration of the canal line could be undertaken as part of a "biodiversity net gain" while also providing surface water attenuation and enhancing local walking and cycling routes.

A resident highlight that it is desirable that a significant proportion of the thousands of new daily trips generated by logistics facilities should be by walking, cycling or public transport. They state that it should be made clear that comprehensive cycling/walking access points should be provided around the site perimeter, to link to the 'active travel' infrastructure (and bus services) that will be provided to enable employees to travel to work. Clarification regarding access only from the A610 only applying to motorised vehicles is also requested. The importance of linking into and updating Local Cycling and Walking Plans (LCWIP) in a timely manner is highlighted. The roles of developer contributions and other active travel funding are also highlighted.

### **Councils' Response**

Nottinghamshire County Council's comments are noted. Further assessment work has been undertaken in respect of access and the access requirements have been reflected within the policy wording. A detailed transport assessment would be required as part of a future planning application. The site boundary has been updated.

The Coal Authority and Severn Trent Water were consulted, and their comments considered.

The Environment Agency's comments are noted, and development will be directed to areas of lowest flood risk. Further detailed flood work is also being undertaken. The comments in respect of protected species are noted. Detailed ecology work is also being undertaken to understand and mitigate any impact on biodiversity and the Local Wildlife Sites. The comments in respect of groundwater and contaminated land are noted and detailed site investigation work would be required as part of a planning application.

The comments of National Highways are noted. The impact on the Strategic Road Network has been considered as part of the transport modelling, with more detailed analysis forming part of a transport assessment.

The comments of the Coal Authority are noted, and any planning application would need to be supported by a Coal Mining Risk Assessment.

The comments of Historic England are noted. Further detailed heritage assessment work is being undertaken which will inform the final site layout. The policy includes a requirement to avoid and mitigate any harm and to also enhance any heritage opportunities.

Natural England comments are noted. Ensuring the development protects, incorporates and enhances blue and green infrastructure is included in the policy. Ecology surveys are being undertaken and priority habitats will be protected where

possible. There are opportunities to provide biodiversity net gain both within the site and adjacent to it.

Nottinghamshire Wildlife Trust's objection is noted. Further detailed ecology work is being undertaken and the site layout will be required to avoid harm to ecology and the Local Wildlife Sites and to provide suitable mitigation if required, including at least 10% biodiversity net gain.

Severn Trent's comments are noted. Further detailed flood modelling work is also being undertaken. Policy wording is included to ensure that surface water discharges are connected in accordance with the drainage hierarchy, measures are taken to protect water resources and SuDS are incorporated within the development.

Derbyshire County Council's comments are noted. A Green Belt Review has been undertaken and the site layout will be required to minimise potential sprawl and potential coalescence. Detailed highways work, including through the Transport Modelling, has considered the impact on the wider highway network.

Awsorth Parish Council's comments are noted and the relevant policies within the Neighbourhood Plan which any proposed application would be assessed against. The Council has undertaken consultation at Regulation 18 stage and comments have been considered accordingly. The country park can be delivered as part of the development. Further rail connection feasibility work is being undertaken. Additional access work has also been undertaken to ensure there is not an unacceptable impact on local roads. The impact on Green Belt, ecology, heritage and flooding has been considered as part of the background evidence work and further work will be required as part of any future planning application. The policy requires ensuring there are not unacceptable noise impacts arising from the development. The need for wider community benefits to be delivered as part of the development are noted.

Mansfield District Council's comments are noted.

Amber Valley Borough Council's comments are noted, including the need to consider the impact on wider road infrastructure and to enhance public transport infrastructure and walking and cycling routes.

The comments of Sport England are noted. The policy includes reference to ensuring that playing fields located to the north and southeast of the site are not adversely impacted by the development.

The comments of the Chetwynd: The Toton and Chilwell Neighbourhood Forum are noted.

The comments of Harworth Group in support of the allocation are noted, including the approach to heritage, flooding, site access and reducing the impact on the Green Belt. The site boundary has been amended to reduce the areas of the site which are at higher risk of flooding.

Comments made by other site promoters in relation to the site's delivery and site constraints are noted. The site has been included within the Strategic Plan's viability work and detailed work has been undertaken in respect of ecology, access and flooding. Further feasibility work in relation to the rail access has also been undertaken. It is considered that other parcels of land being promoted by separate site promoters, not adjoining the site, are not required to create a more comprehensive development. The site selection document details why the site was selected compared to other sites being promoted.

Severn Trent Green Power's comments are noted. The impact on the wind turbine would need to be considered as part of any proposed site layout. Openreach's comments are noted.

The comments of Pedals are noted. Any development proposals would need to consider the impact on the viaduct and its setting and would need to link to and support recreational opportunities offered by the enhancements which have been made to the viaduct.

Detailed land contamination surveys will be undertaken as part of a planning application. The policy includes considering how to enhance blue and green infrastructure assets which will also link to providing biodiversity net gain and enhancing walking and cycling routes.

The need to ensure that the development links to and enhances active travel infrastructure and bus services are noted and this is a requirement within the policy.

### **Changes Made**

Policy wording for the Former Bennerley Coal Disposal Point includes access requirements, the need to avoid or mitigate harm to heritage assets and ecology and the need to enhance blue and green infrastructure. Policy wording is also included related to surface water runoff.

The development must also link to and enhance active travel infrastructure and support public transport improvements.

The policy includes reference to ensuring that playing fields located to the north and southeast of the site are not adversely impacted by the development and that the development should not give rise to unacceptable noise impacts.

The site boundary has been updated.

### *Site: RBC-L01 Ratcliffe on Soar Power Station*

Comments on this site were received from the following:

Environment Agency, Historic England, Natural England, National Highways, Nottinghamshire County Council (Highways, Minerals and Waste and Heritage), North West Leicestershire, Severn Trent Water, Mansfield District Council, Uniper, Peveril Securities Limited, Omnivale Pension Scheme, Hortons' Estate Limited, Hallam Land Management Limited, Richborough, Knightwood Developments Limited, Wilson Bowden Developments, the MP for Rushcliffe, two Councillors for Gotham, Gotham Parish Council, Barton in Fabis Parish Council, Thrumpton Parish Meeting, Kingston on Soar Parish Council, Ratcliffe on Soar Parish Meeting, The Nottinghamshire Campaign to Protect Rural England, Normanton on Soar Parish Council, The Toton and Chilwell Neighbourhood Forum, Pedals and Open Reach.

In addition to the above stakeholders two local residents submitted representations on this site.

### **Summarised comments from statutory organisations**

The Environment Agency had no further comment to make than those already provided in relation to all matters under their remit during the consideration of the Local Development Order. They stated that the Power Station has received planning permission and extensive comments relating to the Local Development Order have been addressed through this process.

Historic England stated that there are a number of heritage assets that could be harmed through the development of the Power Station including the likely presence of important archaeological remains. They raised that a heritage assessment would need to be prepared for the site to understand what the level of harm is to the significance of the heritage assets, including the assets setting and whether any harm could be avoided or mitigated, as well as what contribution the development makes to the significance of heritage assets. They stated that an assessment should consider whether there are enhancement opportunities. Historic England also confirmed that they would expect to see a site-specific policy for this proposed allocation, leading into a Masterplan approach, which would be informed by a heritage assessment.

Natural England advised that the proposed allocation is in proximity to Lockington Marshes and Attenborough Gravel Pits SSSIs. They advised that any development should demonstrate that any potential adverse effects to the SSSIs can be avoided or mitigated. They recommended that opportunities for green infrastructure should be considered at the outset and referred their Green Infrastructure Framework. They also advised that biodiversity net gain and how this will be accommodated should be considered at the earliest stages of the planning process.

National Highways had no objections in principle to the proposal, however they stated that the traffic and transport impacts would need to be fully evidenced and mitigated where necessary. They stated that as the proposed allocation shares a common boundary with the strategic road network, they would require any potential boundary

impacts to be considered and any potential adverse impacts appropriately mitigated. They stated that these can be dealt with at the planning application stage.

Nottinghamshire County Council as highways authority were satisfied that highways implications were adequately captured.

Nottinghamshire County Council as Minerals and Waste Planning Authority stated that there are a number of requirements contained within the Local Development Order relating to Gypsum extraction, the extraction and reuse of fly ash and the reuse of surplus heat generated from Emerge through the development of a local heat network. They considered it appropriate to have these within the Strategic Plan as well to ensure these are considered should the Local Development Order not commence or is amended in any way.

From a heritage perspective, Nottinghamshire County Council stated that consideration should be given to the potential impacts arising from visual intrusion on views from and to Kingston Hall Historic Park and Garden and its setting to ensure that no 'harm' is caused. They commented that large logistics buildings close by at the M1 junction 24 have already impacted on long views from the hall and parkland, and the potential for cumulative impacts arising from further development put forward in the 'Preferred Approach' must be fully and properly considered and accounted. They stated that this is not accounted for in the 'constraints' identified in the report appendix and there is no discussion of this factor. They recommended that if the proposed allocation is to be taken forward into the final Strategic Plan, heritage impacts are recognised as a constraint and an appropriate assessment undertaken.

North West Leicestershire District Council noted that the redevelopment of the Ratcliffe on Soar Power Station site, as permitted through the Local Development Order, will have a 'severe' impact on the strategic road network including, but not limited to, M1 junction 24. They suggested that a joined-up approach is required to measure the cumulative impacts and then to identify and find means to deliver mitigation for the totality of development at the Power Station. They confirmed that they commissioned transport modelling to assess the implications of all of these developments.

Severn Trent Water stated that the background information for the proposed allocation suggested that it has its own water treatment capabilities which need assessing prior to development. However, they highlighted that if the treatment facility is found not to be suitable and would need to discharge into the Severn Trent network, there would be a high risk of impact on local sewage treatment works. They confirmed there is a low risk arising from surface water discharge due to the presence of watercourses. They outlined their policies relating to blue and green infrastructure and SuDs amongst other matters.

Mansfield District Council recommended a masterplan/design code to be prepared for the proposed allocation to set out the detailed design parameters to address/mitigate any harm to arise from the development.

### **Summarised comments from developers**

Uniper (the site owner) confirmed that the distribution and logistics element of the Local Development Order is fairly and accurately presented, and expressed their full support for the proposed allocation as it relates to Uniper's Ratcliffe on Soar site.

Peveril Securities Limited and Omnivale Pension Scheme stated that the timescale for the availability of the Power Station for redevelopment is unclear, as the Background Paper stated "2030s" i.e. a 10-year span which could change given the ongoing uncertainty in the global energy markets. They suggested that this level of uncertainty would be unattractive for future occupiers. In this regard, they noted that the parent company of the Ratcliffe-on-Soar Power Station (Uniper UK Limited) sought two bailouts from the German Government in 2022.

Hortons' Estate Limited suggested that the floorspace estimate for the site is too high, once you consider the assumptions in the logistics study and ancillary requirements such as SuDs, parking, loading and landscaping. They suggested reducing the floorspace from 180,000m<sup>2</sup> to 127,400m<sup>2</sup>.

Hallam Land Management Limited supported the proposed allocation of the Power Station in principle but raised concern over the distance of the site from the existing built-up area, and therefore local labour. They commented that employees of the proposed allocation would be highly reliant upon the private car, and therefore the location is unsustainable. They raised that any new Green Belt boundary should have regard to the NPPF and delivering a long-term vision for the area. The landowner promoted the delivery of a new settlement, New Kingston, alongside the proposed allocation at the Power Station to enable future employees to live in proximity to their jobs, in turn reducing the reliance on the private car.

Richborough and Knightwood Developments Ltd raised concern over the deliverability of the allocation given that the Power Station remains operational, and the Government's potential decision to extend the life of the Power Station as a back-up coal power station to meet essential energy supply.

Wilson Bowden Developments queried the deliverability of the proposed allocation to meet the identified employment need given the decontamination works required, which could take years. The landowner raised that the Local Development Order did not confirm timescales for delivery and suggested that greater detail should be provided within a delivery plan to ensure the deliverability of the proposed allocation within the plan period.

### **Summarised comments from other organisations**

The MP for Rushcliffe stated that they only support logistics on the site which would support the energy generation and advanced manufacturing priorities of the East Midlands Freeport.

Two RBC Councillors for Gotham, Gotham Parish Council, Barton in Fabis Parish Council, Thrumpton Parish Meeting, Kingston on Soar Parish Council and Ratcliffe on Soar Parish Meeting stated their support for the proposed allocation of the Power Station on the basis that it accords with the approved Local Development Order. They commented that the area to be allocated for strategic distribution and logistics purposes



was unclear on the site map and reiterated that they do not support the allocation of land for strategic distribution and logistics purposes beyond what has been agreed within the Local Development Order. They suggested amending the proposed allocation red line to align with what is permitted within the Local Development Order, to exclude land south of the A453. They raised uncertainty over whether the proposed allocation would remove land from the Green Belt and commented that warehousing would not be appropriate development within the Green Belt. They queried the deliverability of the proposed allocation with regards to the impact on the strategic and local road network and raised concern over the impact of the proposed allocation on the strategic road network.

The Nottinghamshire Campaign to Protect Rural England objected to the proposed allocation of the Power Station and commented that they could not find evidence of the opportunities to enhance the landscape and openness or how the development would improve the landscape and visual amenity as suggested in the proposed allocation of the Power Station.

Normanton on Soar Parish Council commented that the Green Belt should be protected, they raised concerns over the amount of traffic on the A453, and they stated that there was too much warehousing which should where possible be located on brownfield sites.

The Toton and Chilwell Neighbourhood Forum stated that the environmental, heritage and archaeological value of the proposed allocation should be respected and preserved as much as possible.

Pedals recognised advantages of the proposed allocation as part of the wider plans for the regeneration of the Power Station. They recommended combining the proposed allocation with improved active travel provision and suggested a new foot-cycle bridge across the River Trent to and from the north bank near the Chetwynd Barracks regeneration site.

Openreach commented that for commercial/retail developments full fibre network will be available to provide either fibre to the premise broadband or faster circuits if the owner/tenant required it.

### **Summarised comments from local residents**

One local resident commented that the proposed allocation of the Power Station is logical for re-development. They raised that they would not want land to the south of the A453 to be developed for logistics. They questioned if the re-development of the site for logistics would prevent the site being used for power production from solar or nuclear in the future. They queried how increased traffic generated by the proposed allocation will be managed in the long term, as they do not want the A453 to get congested and local roads are already used as a rat run. They also questioned what would be done to minimise the visual impact of the proposed allocation.

One local resident suggested amendments to the table on page 18 of the consultation document. They suggested adding a paragraph to the commentary on Strategic

Highway Connections to highlight how connectivity to settlements north of the River Trent to the Power Station via public transport and bicycle is unlikely. They also suggested adding a paragraph to the commentary of Accessibility of Labour to cover active travel.

### **Councils' Response**

The site has been assessed as part of the Greater Nottingham Heritage Impact Assessment as part of Employment Background Paper. In addition, the site has an approved Local Development Order, which is akin to having the status of Outline Planning Permission. Having regard to comments received, and any evidence-based documents, consideration will be given as to what criteria will need to be included in a site-specific policy.

It is envisaged that a site-specific policy will include an indicative masterplan for the development of the site. This will be produced having regard to the Local Development Order. This will minimise the potential of conflict between the parameters of the Local Development Order, and the parameters of the site-specific policy within the Strategic Plan

In regard to the development of the site, the approved Local Development Order demonstrates how the site can be developed within the timeframes of the strategic plan. A significant part of the site can be developed prior to the closure and decommissioning of the power station itself.

When considering floorspace capacity, the Borough Council has had regard to the latest source of information, which is the consented Local Development Order. The site area cited in the background paper is an estimate of what proportion of the power station site, which is part of a much wider development. Ancillary requirements, such as SuDs and Parking would fall outside of this.

The Councils consider that outside of the power station site itself, there are no exceptional circumstances to justify the further release of land from the green belt in the wider area.

### **Changes Made**

Consideration has been given as to what criteria should be contained in a site-specific policy within the Publication Strategic Plan.

## Alternative and Additional Sites

### *Broxtowe*

Representations promoting or commenting on additional or alternative sites in Broxtowe were received from the following:

Environment Agency, R Salmon, Hortons' Estate Limited, Wilson Bowden, Mulberry Land and Peveril Securities Limited & Omnivale Pension Scheme.

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### **Gilt Hill (smaller site) BBC-L02a**

Comments on this site were received from the following:

Environment Agency

#### **Summarised comments from statutory organisations**

The Environment Agency state that the western edge of the site bounds the Gilt Brook which is designated as an ordinary watercourse and therefore the Lead Local Flood Authority would need to be consulted. The area around the Gilt Brook also falls within Flood Zone 3 so any proposals should take a sequential approach to site layout by directing development to the areas of lowest flood risk within the site boundary. In respect of Fisheries, Biodiversity and Geomorphology, the Environment Agency state that based on biodiversity value and risk of damage to important/protected habitats or species, this is a preferred site.

There are historic protected species records of water vole on the Gilt Brook, which borders the site. Whilst this is not a statutory main river, they would like to see a minimum of 8m undeveloped buffer zone, ideally 10m to avoid encroachment and help protect the water vole which might still be present. They advise that site A would be selected in preference to site B to protect water voles possibly being abundant more upstream adjacent to site B and site A being located further away from the SSSI site Sledder wood. Site A also does not border as many LWS's as site B or include deciduous woodland within the proposed development boundary as site B does, which is protected under the NERC Act 2006.

<b>Councils' Response</b>
The comments are noted.
<b>Changes Made</b>
Additional mitigation text has been added to the Sustainability Appraisal.

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### **Gilt Hill (larger site) BBC-L02b**

Comments on this site were received from the following:

Environment Agency

#### **Summarised comments from statutory organisations**

The Environment Agency state that the western edge of the site bounds the Gilt Brook which is designated as an ordinary watercourse and therefore the Lead Local Flood Authority would need to be consulted. The area around the Gilt Brook also falls within Flood Zone 3 so any proposals should take a sequential approach to site layout by directing development to the areas of lowest flood risk within the site boundary.

There are historic protected species records of water vole on the Gilt Brook, which borders the site. Whilst this is not a statutory main river, they would like to see a minimum of 8m undeveloped buffer zone, ideally 10m to avoid encroachment and help protect the water vole which might still be present. They advise that site A would be selected in preference to site B to protect water voles possibly being abundant more upstream adjacent to site B and site A being located further away from the SSSI site Sledder wood. Site A also does not border as many LWS's as site B or include deciduous woodland within the proposed development boundary as site B does, which is protected under the NERC Act 2006.

<h4><b>Councils' Response</b></h4>
The comments are noted.
<h4><b>Changes Made</b></h4>
Additional mitigation text has been added to the Sustainability Appraisal.

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### **Land at Kimberley Eastwood Bye Pass BBC-L04**

Comments on this site were received from the following:

Environment Agency

#### **Summarised comments from statutory organisations**

The Environment Agency identify the site as being located within Flood Zone 1. In respect of Fisheries, Biodiversity and Geomorphology, the Environment Agency state that based on biodiversity value and risk of damage to important/protected habitats or species, this is a preferred site.

There are no statutory main rivers or watercourses are present within this site boundary and no protected species records that the Environment Agency leads on within the boundary or nearby. However other protected species records exist nearby. Part of verge wood LWS is included within the site boundary, so they would encourage this habit be retained as part of designs, as well as the deciduous woodland to the south of the site, protected under the NERC Act 2006 and near to another ancient woodland site. There is an opportunity to enhance the LWS through biodiversity net gain.

#### **Councils' Response**

The comments are noted. As detailed in the Strategic Distribution Background Paper (2023), among the sites in Broxtowe, this site is the second preference. It is less preferable than site BBC-L01 because of the absence of potential rail access. It is more preferable than the other options because of the potential for tram access, which, if delivered in the future, would have benefits for carbon reduction and would reduce adverse impacts on the A610 roundabout.

#### **Changes Made**

Additional mitigation text has been added to the Sustainability Appraisal.

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### **Land at Low Wood Road, Nuthall BBC-L05**

Comments on this site were received from the following:

Environment Agency, Peveril Securities Limited & Omnivale Pension Scheme

#### **Summarised comments from statutory organisations**

The Environment Agency identify the site as being located within Flood Zone 1. Despite no statutory main rivers occurring within the site boundary or any other watercourses, the location is directly adjacent to important habitats such as the Sellers Wood SSSI, ancient woodlands and LWS. This is in unfavourable recovering condition. Low Wood LWS has also partly been included within the boundary. Other LWS border or are near to the proposed site as well as deciduous woodland protected under the NERC Act 2006.

#### **Summarised comments from developers**

Peveril Securities Limited & Omnivale Pension Scheme highlight that the location of the site close to the strategic motorway network, with access to East Midlands rail freight terminal and airport, would lower transport emissions. The site can accommodate clear landscape buffers, retain and enhance woodland, achieve biodiversity net gains and can be designed to incorporate low carbon technology in order to support the national decarbonisation strategy. They refer to carbon zero specialists being involved to advise

on the scheme to ensure it achieves a low carbon footprint and high levels of thermal performance. Key sustainability measures are listed which includes electric vehicle parking, safeguarding for a future tram extension and park and ride, renewable energy generation, high levels of insulation, sustainable construction and blue and green infrastructure. In respect of the tram, they state they would work closely with NET to establish the potential for an extension and a park and ride facility would be provided to further encourage sustainable patterns of travel. They highlight other benefits of the site including access to a skilled labour supply, proximity to a major urban area, ability to operate a 24/7 operation and sufficient energy capacity. They consider that the impact on the Green Belt could be limited. Previous projects the site promoters have been involved in are also highlighted.

#### **Councils' Response**

The comments, including highlighting the site's sustainability credentials, and other potential benefits of the site, are noted.

#### **Changes Made**

No changes made.

### **Land at New Farm Nuthall BBC-L06**

Comments on this site were received from the following:

Environment Agency and Wilson Bowden

#### **Summarised comments from statutory organisations**

The Environment Agency identify the site as being located within Flood Zone 1.

Despite there being no statutory main rivers or watercourses directly within the site, there is a watercourse inhabited by the protected species white clawed crayfish which are sensitive to water quality. This location also borders Bulwell Wood SSSI, Bulwell wood and pond LWS and Bulwell Wood ancient woodland. There is therefore likely impact to these protected sites, unless careful design and biodiversity net gain can be considered to improve the part of the site that is in unfavourable declining condition. This site is also adjacent to important habitats such as the Sellers Wood SSSI, ancient woodlands and LWS, which is in unfavourable recovering condition.

#### **Summarised comments from developers**

Wilson Bowden question why the smaller 25Ha site was not considered. They state that the site is available and suitable for general employment development to complement the existing Blenheim Industrial Estate located to the north-east of the site. They make a number of comments in relation to the assessment of site BBC-L06, highlighting that the site is sequentially preferable when compared with the alternative sites as the development of this site would constitute an extension of the existing Blenheim

Industrial Estate and that exceptional circumstances exist to remove the site from the Green Belt. They highlight that the development could contribute to highway improvements at Junction 26, a further assessment of agricultural land classification would be undertaken, the part of the site in the NO2 Agglomeration Zone could be removed, mitigation could be provided in respect of ecology and the groundwater flood risk data is queried. In respect of the SA scoring, they state that the site was the third most favourable site.

### **Councils' Response**

The Environment Agency's comments are noted.

The comments are noted. The smaller site was considered as part of the larger site assessment. For all of the sites considered, developing smaller parcels may have been options or required to mitigate other impacts. As detailed in the Strategic Distribution Background paper (2023), the site is considered less preferable than site BBC-L01 because of the absence of potential rail access. The comments related to highway improvements and agricultural land classification are noted. Mitigation text has been added to objective 11 to avoid the NO2 agglomeration zone but the scoring has not changed. There is existing mitigation text related to ecology, including a reference to Biodiversity Net Gain. It has been identified that the site is at low risk of flooding.

### **Changes Made**

Mitigation text has been added to Sustainability Appraisal objective 11 to avoid the NO2 agglomeration zone.

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## **Land at Shilo Way, Awwsworth BBC-L07**

Comments on this site were received from the following:

Mulberry Land

### **Summarised comments from developers**

Mulberry Land state that land at Shilo Way in combination with Bennerley, could come forward jointly to provide a comprehensive area of employment land to address the need. They state that land at Shilo Way performs no worse than the constraints listed for the former Bennerley Coal Disposal Point, and performs better when considering impacts from flood risk, and a greater distance from the Grade II\* listed Bennerley Viaduct. They state that site is identified as being within an Area of Opportunity around junction 26 of the M1, and therefore it has strong strategic connections. They consider



the site should have been subject to further assessment as a masterplan demonstrates that the site could comfortably accommodate a GIA of 327,000sqft developable employment land.

#### **Councils' Response**

The site was not identified as a reasonable alternative for further consideration because its limited size appears to make it unsuitable for large-scale logistics development. It is separated from the Bennerley site by approximately 900m and is not physically connected to the site. It is considered that including the site would not result in a comprehensive development.

#### **Changes Made**

No changes made.

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### **Land to the south-east of M1 Junction 26 BBC-L08**

Comments on this site were received from the following:

Environment Agency, Hortons' Estate Limited, and R Salmon

#### **Summarised comments from statutory organisations**

The Environment Agency identify the site as being located within Flood Zone 1. In respect of Fisheries, Biodiversity and Geomorphology, the Environment Agency state that based on biodiversity value and risk of damage to important/protected habitats or species, this is a preferred site, provided that the ancient woodland was retained as an irreplaceable habitat.

There are no statutory main rivers or watercourses directly within the site or protected species that the Environment Agency lead on. However, there is an ancient woodland site located within the site boundary 'M1 woodland LWS'. If this site was selected as a preferred alternative, then they would advise that the ancient woodland be retained.

#### **Summarised comments from developers**

R Salmon states that it would appear there is still a shortfall of 50 ha, after allocating the two preferred sites. BBC-LO8 is classed as a reasonable alternative site, having the best score in the Sustainability Appraisal. The site can be used as a logistics and distribution site without the need for major preparatory work, is level with no flood risk, is close to Broxtowe and Bilborough, where employment deprivation is high, enabling employees to either walk, cycle or use the local bus service to work. An adjacent landowner has recently made their land available for development which could be added to the site. They also consider that the recent cancellation of HS2b means that there is approximately double the area of developable land now available in BBC- L08.



Hortons' Estates Limited propose that a third strategic logistics site should be allocated with the ability to deliver significant new floorspace immediately. They consider that the land controlled by Hortons at Junction 26 of the M1 fits these requirements. Both parcels of land are located adjacent to the strategic motorway network and are free from any significant constraint, are not contaminated, have very little ecological potential and are not at risk of flooding. They also refer to highway improvement works to the network in the area and the proximity to a large potential work force which can access the site via sustainable and active travel modes.

<b>Councils' Response</b>
The Councils consider that the site is not a preferred site for logistics development for the reasons outlined in the Strategic Distribution Background Paper (2023).
<b>Changes Made</b>
No changes made.

## Erewash

Although the Strategic Plan does not include land within Erewash, the Background Paper was produced in conjunction with Ashfield and Erewash Councils, and as a result commentary was received on two sites outside the plan area, both within Erewash.

Representations promoting or commenting on additional or alternative sites in Erewash were received from the following:

GLP

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### Land South-West of Junction 25 of the M1 EBC-L02

Comments on this site were received from the following:

GLP

#### Summarised comments from developers

GLP (the landowner) disagree with the analysis of the site at Step 3, and object to the conclusion that this site should not be identified as a proposed strategic logistics site, notably that the site is not required to meet Erewash's employment needs (being met at Stanton North) and no exceptional circumstances to release the site from the Green Belt.

The reference in the assessment to Stanton North being more than sufficient to meet Erewash's needs overlooks the fact that the need for strategic logistics development is assessed on a regional basis across the HMA, and by its very nature this is a cross-boundary issue where the need cannot be neatly apportioned to individual authorities.

<b>Councils' Response</b>
Comments have been forwarded to Erewash Borough Council for consideration as part of their Core Strategy Review.
<b>Changes Made</b>
No changes proposed within the Greater Nottingham Strategic Plan.

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### Stanton North EBC-L01

Comments on this site were received from the following:

GLP

#### Summarised comments from developers

GLP (the landowner of EBC-L02) consider this site is not a strategic site. The size of the units within extant permissions are below the warehouse sizes defined in the Icen

Study of 100,000. Furthermore, the Stanton North site is relatively poorly located in terms of its access to the strategic road network. Consequently, we anticipate that this site will not be considered a prime location for strategic logistics operators, given the importance of good road access, as highlighted in the 2022 Icen Logistics Study.

<b>Councils' Response</b>
Comments have been forwarded to Erewash Borough Council for consideration as part of their Core Strategy Review.
<b>Changes Made</b>
No changes proposed within the Greater Nottingham Strategic Plan.

## *Gedling*

Representations promoting or commenting on additional or alternative sites in Gedling were received from the following:

Trustees of Hammond Farms

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### **Land at Stockings Farm, Redhill, Arnold**

Comments on this site were received from the following:

Trustees of Hammond Farms

#### **Summarised comments from developers**

Geoffrey Prince Associates promoting a mixed-use scheme at Stockings Farm, Arnold which would provide 10 ha of land for distribution, logistics and general employment purposes. The consultee considers that the Preferred Approach is flawed as it does not recognise the growing demand for smaller distribution and logistics hubs which the consultee considers is a strategic planning issue. There is growing demand for strategically located sites ranging from 5 ha to 20 ha with floorplates between 1,000 to 10,000 sq. m located within and adjoining the main built-up area of Greater Nottingham. Comments that the north and east of Greater Nottingham are devoid of such sites. Land at Leapool island is well located to meet this need and has good road connections to the north and the northern and north-eastern parts of Greater Nottingham. The consultee refers to high commuter flows from Gedling, the age of the existing employment space, low take up and loss of existing employment land to residential uses as reasons for providing additional distribution floorspace in Gedling. This is considered a strategic planning issue requiring Green Belt release where the land at Leapool Island was of limited value in meeting the purposes of the Green Belt according to the Gedling green belt review (December 2022). This matter should be addressed through the GNSP and not left for consideration in the Part 2 Local Plan.

#### **Councils' Response**

The ELS assesses the general need for industrial and warehousing sites and there is more than enough general employment land to meet needs including for smaller scale distribution and logistics facilities provided across the Greater Nottingham Plan Area.

The site was assessed and not considered a reasonable alternative for strategic distribution on the basis that the site is insufficiently large enough and not within an Area of Opportunity for distribution uses. The location does not meet the criteria for having good road access with congestion on the A60 and its associated AQMA being a particular issue.

<b>Changes made</b>
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None
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## *Rushcliffe*

Representations promoting or commenting on additional or alternative sites in Rushcliffe were received from the following:

Richborough, Herrick and Mattock, Knightwood Developments Ltd and Oxalis Planning.

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### **Land to the north of Melton Road, Edwalton (Edwalton Triangle) (RBC-L10)**

Comments on this site were received from the following:

Richborough

The consultation document considered the site and concluded that the site would not be put forward as a reasonable alternative. Richborough commented that the site should not be disregarded because the A52 is not dualled in the site's location, as works are taking place to improve the overall A52 route, and the A52 connects to the A1 and A46 which provides a regional link. Richborough commented that within the consultation document, the site was not viewed as strategic scale, but Richborough highlighted that the site is located within a high development area with close proximity to the strategic allocations. Richborough suggested that the site could be considered suitable as part of the future Part 2 Rushcliffe Local Plan.

#### **Councils' Response**

As recognised by the site promoter, the site is not strategic in scale, therefore the Councils consider that the proposal is beyond the scope of the strategic plan. This, however, would not preclude further consideration as a non-strategic allocation in a future Plan.

#### **Changes Made**

None

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### **Land at Jerico Farm, A46 (RBC-L07)**

Comments on this site were received from the following:

Herrick and Mattock

The consultation document considered the site and concluded that the site would not be put forward as a reasonable alternative. Herrick and Mattock commented that the site should not be discarded because it is outside the Area of Opportunity at Newark. They stated that the site is within close proximity to the Area of Opportunity, has a suitable connection to the A46 and is unconstrained. They highlighted that Highways England has funded and committed to an improvement scheme to the A46 to Newark which will

provide a dual carriageway route through to the A1. Herrick and Mattock raised that Jerico Farm would access an untapped workforce that live in proximity to the A46, given that the proposed allocations and reasonable alternatives are typically located in proximity to the M1 between Nottingham and Derby, which saturates the labour supply. Herrick and Mattock also highlighted that the site is located outside of the Green Belt.

#### **Councils' Response**

The site is largely located within the Nottingham Derby Green Belt and has been ruled out when assessed against number of criteria.

#### **Changes Made**

No change made.

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### **Land South of A52, Whatton (RBC-L09)**

Comments on this site were received from the following:

Knightwood Developments Ltd

The consultation document considered the site and concluded that the site would not be put forward as a reasonable alternative. Knightwood Developments Ltd commented that the site should not be disregarded because the A52 is not dualled in the site's location, as works are taking place to improve the overall A52 route, including signalisation and junction reconstruction. They also reiterated that the A52 links to the A1 and A46 which are both dualled and provide strategic connectivity regionally and to the north and south. Knightwood Developments Ltd suggested that the site could be considered suitable as part of the future Part 2 Rushcliffe Local Plan.

#### **Councils' Response**

The site has been ruled out when assessed against number of criteria. This does not however preclude further consideration as part of future reviews of the local plan.

#### **Changes Made**

No change

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### **Rushcliffe Gateway (RBC-L02)**

Comments on this site were received from the following:

Oxalis Planning

The site was considered a reasonable alternative and underwent a further Stage 2 Assessment. Based on the assessment, the site was not taken forward as a proposed allocation. Oxalis Planning disputed several points made within the Stage 2 Assessment. To address the assessment, the landowner submitted a Transport Technical Note (appended to their representation) which confirmed that an appropriate access to the site can be established and to confirm the site's accessibility by sustainable modes of transport. Oxalis Planning also disagreed with the assessment's conclusions regarding the harm to the Green Belt and queried why the assessment conclusions appear to contrast with the evidence base and the recommendation by the Aecom Study to investigate further the suitability of growth in the broad area along the A453 corridor.

#### **Councils' Response**

The growth options study was a policy off study when looking at the potential suitability of areas for development. It did not look into any detail the impact of development on the purposes of including land within the green belt, the type of development proposed. The Councils consider that the site is not suitable for logistics development for the reasons outlined in the Strategic Distribution Background Paper (2023).

#### **Changes Made**

None proposed

### **Land West of the A46, East of Cotgrave**

Comments on this site were received from the following:

John A Wells Ltd

John A Wells Ltd submitted this site for consideration as a strategic logistics site, with an area of 50 hectares and the potential to deliver 100,000m<sup>2</sup> – 150,000m<sup>2</sup> of floorspace. They recognise that the site lies outside an Area of Opportunity, but it has access to the strategic road network and sustainable transport options. They stated that there was no landscape or ecological designations that constrain the site, and that the site benefits from natural screening from the existing woodland surrounding the site. They suggested that the site is allocated to provide a balanced portfolio of strategic sites to meet employment needs.

#### **Councils' Response**

The Councils consider that the site is not suitable for logistics development for the reasons outlined in the Strategic Distribution Background Paper (2023).

#### **Changes Made**

None proposed



## Glossary

Comments on the Glossary were received from the following:

David Rhead

### Summarised comments from local residents

David Rhead states that in view of the inter-relationships between LCWIPs I suggest that you insert an entry the following into the Glossary.

*"Local Cycling and Walking Infrastructure Plan (LCWIP).: plan for the future development of cycling/walking infrastructure, drawn up by the local highway authority in consultation with the community."*

They also suggest that the following is included in the Glossary.

*"D2N2: Derby, Derbyshire, Nottingham & Nottinghamshire,*

*EMCCA: East Midlands Combined County Authority,"*

#### **Councils' Response**

Local Cycling and Walking Infrastructure Plan (LCWIP) will be included within the Glossary of the Publication Draft Strategic Plan.

#### **Changes Made**

Local Cycling and Walking Infrastructure Plan (LCWIP) included within the Glossary of the Publication Draft Strategic Plan.

## **Sustainability Appraisal**

### *Comments on the Methodology and Appraisal of Preferred Approach Options*

Comments on the Sustainability Appraisal were received from the following: Historic England, Environment Agency, Wilson Bowden, Knightwood Developments Limited, Richborough and Peveril Securities Limited & Omnivale Pension Scheme.

One resident also submitted comments on the Sustainability Appraisal.

### **Former Bennerley Coal Disposal Point**

#### **Summarised comments from statutory organisations**

Historic England note that the site that scored the worst for the historic environment is BBC-L01 Former Bennerley Coal Disposal Point, yet this has been progressed by the Council as a preferred site. They request to understand if there are other sites that could be taken forward that do not have the same level of harm for the historic environment. There are a number of sites that scored as an uncertain '?' against the historic environment and it would be useful to understand what the SA implications are so that an informed decision on sustainability can be undertaken. They note paragraph 38 that sets out that there is a possibility to reduce harm to heritage through avoidance/ mitigation measures. They state that there is a need to undertake a heritage assessment to assess the level of harm to the significance of heritage assets, including their setting, and if there are appropriate avoidance/ mitigation measures to reduce the harm. This information would be required in order to assess if the judgement is appropriate.

The Environment Agency state that, in respect of BBC-L01, large parts of the site are at risk of flooding from the Gilt Brook and River Erewash. The south-western part of the site is within Flood Zone 3b (functional floodplain) and only essential infrastructure and water compatible development should be located in this part of the site. They advise that, as the site straddles the Gilt Brook, which is an ordinary watercourse, the applicant should consult the Lead Local Flood Authority. Additionally, due to the interaction with the larger River Erewash, the applicant should develop a hydraulic model for the Gilt Brook to ensure flood risk is fully understood. They advise that a sequential approach should be taken to the site layout by directing development to the areas of lowest flood risk. They state that the re-development of this brownfield site presents an opportunity to reduce flood risk downstream and the applicant should explore opportunities to reduce flood risk to the wider catchment where possible.

#### **Summarised comments from local residents**

A resident suggests that, in respect of BBC-L01, mitigation text should be added to ensure that the D2N2 LCWIP gets updated to incorporate plans for timely delivery of

good-quality cycle-routes between the Bennerley site and all the settlements, within a 5-mile radius, where employees are likely to live.

### Summarised comments from developers

Knightwood Developments Limited and Richborough state that, out of the 16 SA objectives, the Bennerley Coal Disposal Point only scores positively on 7, whereas the site scores negatively, or the impact is not known, on 8 of the identified criteria. They consider that, out of those which it has been negatively assessed, these are fairly high/significant impacts, and they are of the view that this fundamentally calls into question the overall suitability of the site to be put forward as a proposed allocation.

Peveril Securities Limited & Omnivale Pension Scheme question the SA assessment in relation to BBC-L01 Former Bennerley Coal Disposal Point. They highlight flooding which has taken place on the site.

### Councils' Response

Further heritage assessment work has been undertaken in respect of the Former Bennerley Coal Disposal Point. The Site Selection Document explains why this site has been selected. The impact on the built and historic environment for other sites would depend on the layout and amount of development and therefore it is considered that the impact is uncertain, although it is noted that avoidance and mitigation measures would need to be identified if they were identified as preferred sites

The response by the Environment Agency is noted and additional mitigation text has been added to refer to the need to develop a hydraulic model and to apply a sequential approach to the site layout to direct development to areas of lowest flood risk. The issues raised would be considered as part of the layout of the site and as part of a future planning application. Comments relating to groundwater and contaminated land have also been noted.

Specific reference to active travel has been added as a mitigation measure to the transport objective.

The responses by other developers are noted. The site selection report provides further background information regarding why the site has been selected.

### Changes Made

Additional mitigation text has been added to the Sustainability Appraisal to refer to flood modelling, applying a sequential approach to site layout and including reference to incorporating active travel measures.

## Ratcliffe on Soar Power Station (RBC-L01)

### Summarised comments from statutory organisations

The Environment Agency reiterated that the proposed allocation is largely within flood zone 1 and the impacts on the main river flood zones are minimal. They stated that any future application must demonstrate that contamination risks can be addressed/managed through the course of the development.

### Summarised comments from local residents

It was also suggested that the mitigation text for the Power Station should cover active travel, and require D2N2 and North West Leicestershire to update their infrastructure plans to incorporate delivery of cycle routes between the Power Station and settlements within a 5-minute radius.

#### Councils' Response

The comments are noted.

The mitigation text already covers active travel. The Councils cannot require other organisations to update their plans/strategies.

#### Changes Made

No changes.

## Reasonable Alternative Sites

### Summarised comments from statutory organisations

In respect of other sites, the Environment Agency state:

- BBC-L02a Gilt Hill (smaller site) and BBC-L02b Gilt Hill (larger site) – The western edge of the site bounds the Gilt Brook which is designated as an *ordinary watercourse* and therefore the Lead Local Flood Authority would need to be consulted. The area around the Gilt Brook also falls within Flood Zone 3 so any proposals should take a sequential approach to site layout by directing development to the areas of lowest flood risk within the site boundary.

BBC-L04 Land at Kimberley Eastwood Bye Pass, BBC-L05 Land at Low Wood Road, Nuthall, BBC-L06 Land at New Farm Nuthall, BBC-L08 Land to the south-east of M1 junction 26, Nuthall – The sites are all located in Flood Zone 1.

- Nottingham Gateway (RBC-L02) - The Environment Agency commented that an area of the site to the west of the A453 is at risk of flooding from the River Trent and recommended that if the site was taken forward development within this area should be avoided where possible. They suggested that the watercourses present within the site offer opportunities for biodiversity net gain and ecological enhancements. They stated that any future application must demonstrate that contamination risks can be addressed/managed through the course of the development.

In respect of Fisheries, Biodiversity and Geomorphology, the Environment Agency state that based on biodiversity value and risk of damage to important/protected habitats or species, their preference as an alternative would be either BBC-L04 Land at Kimberley Eastwood Bye Pass or BBC-L08 Land to the south-east of M1 junction 26, Nuthall, provided that the ancient woodland was retained in the latter, as an irreplaceable habitat. After this Gilt Hill (site a) or Nottingham Gateway would be preferred.

- BBC-L02a Gilt Hill (smaller site) and BBC-L02b Gilt Hill (larger site) – There are historic protected species records of water vole on the Gilt Brook, which borders the site. Whilst this is not a statutory main river, they would like to see a minimum of 8m undeveloped buffer zone, ideally 10m to avoid encroachment and help protect the water vole which might still be present. They advise that site A would be selected in preference to site B to protect water voles possibly being abundant more upstream adjacent to site B and site A being located further away from the SSSI site Sledder wood. Site A also does not border as many LWS's as site B or include deciduous woodland within the proposed development boundary as site B does, which is protected under the NERC Act 2006.
- BBC-L04 Land at Kimberley Eastwood Bye Pass – There are no statutory main rivers or watercourses present within this site boundary and no protected species records that the Environment Agency leads on within the boundary or nearby. However other protected species records exist nearby. Part of verge wood LWS is included within the site boundary, so they would encourage this habit be retained as part of designs, as well as the deciduous woodland to the south of the site, protected under the NERC Act 2006 and near to another ancient woodland site. There is an opportunity to enhance the LWS through biodiversity net gain.

The remaining sites, whilst some have no watercourse within them, either border or include SSSI sites or LWS's within the development boundary. Therefore, particularly those that are adjacent to SSSI sites are likely incur some impact to their ecological value and are therefore less preferable as selected alternative sites.

- BBC-L05 Land at Low Wood Road, Nuthall – Despite no statutory main rivers occurring within the site boundary or any other watercourses, the location is directly adjacent to important habitats such as the Sellers Wood SSSI, ancient

woodlands and LWS. This is in unfavourable recovering condition. Low Wood LWS has also partly been included within the boundary. Other LWS border or are near to the proposed site as well as deciduous woodland protected under the NERC Act 2006.

- BBC-L06 Land at New Farm Nuthall – Despite there being no statutory main rivers or watercourses directly within the site, there is a watercourse inhabited by the protected species white clawed crayfish which are sensitive to water quality. This location also borders Bulwell Wood SSSI, Bulwell wood and pond LWS and Bulwell Wood ancient woodland. There is therefore likely impact to these protected sites, unless careful design and biodiversity net gain can be considered to improve the part of the site that is in unfavourable declining condition. This site is also adjacent to important habitats such as the Sellers Wood SSSI, ancient woodlands and LWS, which is in unfavourable recovering condition.
- BBC-L08 Land to the south-east of M1 junction 26, Nuthall – There are no statutory main rivers or watercourses directly within the site or protected species that the Environment Agency lead on. However, there is an ancient woodland site located within the site boundary ‘M1 woodland LWS’. If this site was selected as a preferred alternative, then they would advise that the ancient woodland be retained.

The Environment Agency commented that an area of the site to the west of the A453 is at risk of flooding from the River Trent and recommended that if the site was taken forward development within this area should be avoided where possible. They suggested that the watercourses present within the site offer opportunities for biodiversity net gain and ecological enhancements. They stated that any future application must demonstrate that contamination risks can be addressed/managed through the course of the development.

In respect of groundwater and contaminated land, the Environment Agency provides “high level” comments. Some of these sites are considered “brownfield sites” in the sense that they are associated with current or historic uses which have or had the potential to cause contamination or pollution. Therefore, in the event of future development proposals, applications must demonstrate that contamination risks can be addressed / managed through the course of development in accordance with NPPF paragraphs 174 and 183. All land contamination assessments must be produced in accordance with the online guidance [Land Contamination: Risk Management \(LCRM\)](#).

Site proposals will also need to carefully consider pollution prevention measures within their surface water drainage solutions. This is especially the case for several of the “Reasonable alternative” sites which are located on bedrock which is classified as a principal aquifer. Principal aquifers provide significant quantities of drinking water, and water for business needs. They may also support rivers, lakes and wetlands.

## Summarised comments from developers

Wilson Bowden made comments in relation to the assessment of site BBC-L06. They highlight that the development could contribute to highway improvements at Junction 26, a further assessment of agricultural land classification would be undertaken, the part of the site in the NO2 Agglomeration Zone could be removed, mitigation could be provided in respect of ecology and the groundwater flood risk data is queried.

In respect of Nuthall Park 26 (BBC-L05) Peveril Securities Limited & Omnivale Pension Scheme raise concerns regarding the scoring and consider that the assessment in respect of the energy and climate and the pollution objectives should be changed to 'Positive' effects. They also consider that scoring related to natural environment and landscape should be revisited, referring to the site characteristics, the potential to provide new routes and green corridors through the site and the mitigation measures such as landscaping which could be provided.

### Councils' Response

In respect of the Environment Agency's response, the comments are noted. For sites BBC-L02a Gilt Hill (smaller site) and BBC-L02b Gilt Hill (larger site), additional mitigation text has been added to refer to the need to apply a sequential approach to the site layout to direct development to areas of lowest flood risk. Mitigation text has also been added to objective 13 to refer to providing a buffer zone to the Gilt Brook to help protect water vole. For BBC-L04 Land at Kimberley Eastwood Bye Pass, mitigation text has been added to objective 13 to refer to protecting and enhancing the Local Wildlife Sites through biodiversity net gain. Comments relating to groundwater and contaminated land have been noted and matters raised would need to be addressed as part of a future planning application.

In respect of Wilson Bowden's response, the comments related to highway improvements and agricultural land classification are noted. Mitigation text has been added to SA objective 11 to avoid the NO2 agglomeration zone but the scoring has not changed. There is existing mitigation text related to ecology, including a reference to Biodiversity Net Gain. It has also already been identified that the site is at low risk of flooding.

In respect of Peveril Securities Limited & Omnivale Pension Scheme's comments, it is considered that until further details are provided in respect of low carbon measures and solutions to climate change, the scoring for objective 10 would remain uncertain. It is considered that development in this location is likely to have an adverse impact on landscape character although it is noted that mitigation measures may reduce this impact. The scoring has therefore not been changed.

### Changes Made

For BBC-L02a Gilt Hill (smaller site) and BBC-L02b Gilt Hill (larger site), additional mitigation text has been added to objective 12 to refer to the need to apply a

sequential approach to the site layout to direct development to areas of lowest flood risk and mitigation text has been added to objective 13 to refer to providing a buffer zone to the Gilt Brook to help protect water vole.

For BBC-L04 Land at Kimberley Eastwood Bye Pass, mitigation text added to objective 13 to refer to protecting and enhancing the Local Wildlife Sites through biodiversity net gain.

For Land at New Farm, Nuthall, the comments related to highway improvements and agricultural land classification are noted. Mitigation text has been added to objective 11 to avoid the NO2 agglomeration zone but the scoring has not changed.



## **Strategic Distribution and Logistics Background Paper**

### *Site Selection Methodology*

Comments on site selection methodology were received from the following:

GLP, Mick Mattock and T W Herrick & Sons, Richborough Estates and D Rhead

#### **Summarised comments from developers**

##### **Comments on Step 2 – Identifying Reasonable Alternatives**

Both Mick Mattock and T W Herrick & Sons and Richborough Estates object to their sites being eliminated as a reasonable alternative, as they meet a number of assessed criteria (within Step 3). Mattock and Herrick identify their site location at Jerico Farm as being partially outside the Green Belt, accessible transport links, and that it is being promoted by a willing landowner and having no flood risk or heritage impact. Similarly, Richborough Estates identify their site at Edwalton Triangle as being located close to strong highways connections, having accessible public transport links, close to a local labour force, being available and actively promoted for logistics development and having no flood risk or heritage impact.

Mick Mattock and T W Herrick & Sons and Richborough Estates also question why rail connectivity is not included in Step 2.

##### **Comments on Step 3 – Assessment of Reasonable Alternatives**

GLP highlight that the original Background Paper omitted their site (EBC-L02). Once this was rectified a revised paper was published which determined that the site was discounted on the basis of need (in Erewash) and loss of Green Belt. GLP are concerned that the late assessment of this site, after the others had been undertaken and conclusions drawn pre-judged the conclusions of its Step 3 assessment. It was not assessed with an open mind alongside the other sites on an equal basis.

Mick Mattock and T W Herrick & Sons and Richborough Estates consider the weight given to rail access is not supported by the Iceni study (para 10.3), nor within market demand or evidence that rail access is viable. Furthermore, in order to decarbonise the freight industry, within Nottinghamshire, the increased use of electric vehicles for final mile deliveries is more realistic. The GNPP have therefore not assessed the technical feasibility, deliverability and viability of adopting such an approach. This is a significant weakness in the GNPP's overall Preferred Approach to the selection criteria and site assessment conclusions that inform how the proposed allocated sites have been selected.

Prioritising one aspect of the site criteria, over the other equally as important considerations does not comply with the NPPF which requires the overarching sustainability objectives, economic, social and environmental are pursued in mutually supportive ways.

### Summarised comments from local residents

D Read suggests amended wording for Paragraph 48 to refer to Local Cycling and Walking Infrastructure Plans.

#### **Councils' Response**

As set out in the Background Paper, in accordance with Logistics Study, strategic sites should be in close proximity to M1 and A1 and the study identifies Areas of Opportunity. Sites outside these areas have been screened out and are not considered reasonable alternatives.

Regarding rail access, sites without rail access have been assessed as reasonable alternatives, however this access is deemed positive as it offers opportunities to transfer freight by rail and thus reduce carbon emissions and pollutants. Sites with access to rail offer a more sustainable location for strategic logistics and this is considered a positive factor and is weighed against any negative effects of developing the site for logistics.

The sites in Erewash were all appraised together alongside sites within the Greater Nottingham Strategic Plan area, unfortunately when amalgamating these assessments in the background paper the site in Erewash (EBC-L02) was not included. This was rectified within a revised version of the background paper.

#### **Changes Made**

No changes are proposed to the site selection process and sites that do not meet the three criteria for selecting reasonable alternatives will remain excluded from further detailed assessments.

## Appendix 1: Greater Nottingham Strategic Plan Growth Options - List of Respondents

### Statutory Consultees

Respondent ID	Respondent Name	Respondent Organisation
27221953	Erewash Borough Council (Mr Steve Birkinshaw)	Erewash Borough Council
27193665	Charnwood Borough Council (Mr Richard Brown)	Charnwood Borough Council
27222529	Derbyshire County Council (Mr Steve Buffery)	Derbyshire County Council
27214977	North West Leicestershire District Council (Sir/ Madam)	North West Leicestershire District Council
27215425	Melton Borough Council (Sir/ Madam)	Melton Borough Council
29435841	Amber Valley Borough Council (Mr Derek Stafford)	Amber Valley Borough Council
27211617	Nottinghamshire CC (Nina Wilson)	Nottinghamshire CC
32966049	Sutton Bonington Parish Council (Helen (Clerk))	Sutton Bonington Parish Council
27186433	Holme Pierrepont & Gamston Parish Council (Mrs Julia Barnes)	Holme Pierrepont & Gamston Parish Council
29847521	West Leake Parish Council (Mr T Barton)	West Leake Parish Council
29737537	Aslockton Parish Council (Belina Boyer)	Aslockton Parish Council
27194625	Gotham Parish Council (Parish Clerk)	Gotham Parish Council
32760417	Chetwynd: The Toton and Chilwell Neighbourhood Forum (Mr Ian Craik)	Chetwynd: The Toton and Chilwell Neighbourhood Forum
29187809	Bradmore Parish Council (Mrs Margaret Curran)	Bradmore Parish Council
27212065	Ruddington Parish Council (Miss Claire Dorans)	Ruddington Parish Council
30096929	Willoughby on the Wolds Parish Council (Mike Elliott)	Willoughby on the Wolds Parish Council
30097121	Whatton-in-the-Vale Parish Council (Mike Elliott)	Whatton-in-the-Vale Parish Council
30097313	Stanton on the Wolds Parish Council (Mike Elliott)	Stanton on the Wolds Parish Council
30097377	Flintham Parish Council (Mike Elliott)	Flintham Parish Council
29373793	Jane Evans	
27212673	East Bridgford Parish Council (Clare Fox)	East Bridgford Parish Council

<b>Respondent ID</b>	<b>Respondent Name</b>	<b>Respondent Organisation</b>
29884577	Alverton & Kilvington Parish Meeting (Mr John Gossage)	Alverton & Kilvington Parish Meeting
27205249	Papplewick Parish Council (Ms Liz Gretton)	Papplewick Parish Council
27205217	Linby Parish Council (Ms Liz Gretton)	Linby Parish Council
27186465	Radcliffe on Trent Parish Council (Ms Jacki Grice)	Radcliffe on Trent Parish Council
27216769	Stanford on Soar Parish Council (Mrs Rebecca Hague)	Stanford on Soar Parish Council
29008161	Rempstone Parish Council (Mrs Rebecca Hague)	Rempstone Parish Council
29296417	Orston Parish Council (Cllr Nicki Hammond)	Orston Parish Council
29284449	Saxondale Parish Meeting (Mr Alan Harvey)	Saxondale Parish Meeting
32618945	Kingston on Soar Parish Council (Mr Mark Johnson)	Kingston on Soar Parish Council
27182689	Ravenshead Parish Council (Ms Belinda Kalka)	Ravenshead Parish Council
29426753	Barton in Fabis Parish Council (Mr Allan Kerr)	Barton in Fabis Parish Council
32208577	St Albans Parish Council (Cllr Francesco Lari)	St Albans Parish Council
29884289	Normanton on Soar Parish Council (Mrs Susan Lewis)	Normanton on Soar Parish Council
32655425	Chetwynd: The Toton and Chilwell Neighbourhood Forum (Mr David Lovett)	Chetwynd: The Toton and Chilwell Neighbourhood Forum
27186401	Greasley Parish Council (Sir/ Madam)	Greasley Parish Council
27213377	Caythorpe Parish Council (Sir/ Madam)	Caythorpe Parish Council
27221441	Stapleford Town Council (Sir/ Madam)	Stapleford Town Council
29932321	Tollerton Parish Council (Sir/ Madam)	Tollerton Parish Council
31675393	East Leake Parish Council (Sir/ Madam)	East Leake Parish Council
27186593	Woodborough Parish Council (Ms Averil Marczak)	Woodborough Parish Council
27186561	St Albans PC (Mrs Lynda Ogilvie)	St Albans PC
29346049	St Albans Parish Council (Cllr Jason King)	St Albans Parish Council
27186625	Calverton Parish Council (Mrs Anne Pallett)	Calverton Parish Council

<b>Respondent ID</b>	<b>Respondent Name</b>	<b>Respondent Organisation</b>
29269601	Elton-on-the-Hill Parish Meeting (Mr Timothy Powell)	Elton-on-the-Hill Parish Meeting
29413985	Granby cum Sutton Parish Council (Mr John Rainbow)	Granby cum Sutton Parish Council
32964673	Kegworth Parish Council (Vicky Roe)	Kegworth Parish Council
29400801	Burton Joyce Parish Council (Mrs Jessica Sherrin)	Burton Joyce Parish Council
29827105	Ratcliffe on Soar Parish Meeting (Mr Raymond State)	Ratcliffe on Soar Parish Meeting
29426625	Bingham Parish Council (Mr John Stockwood)	Bingham Parish Council
32067169	St Albans Parish Council (Cllr Martyn Thorpe)	St Albans Parish Council
29359137	Keyworth Parish Council (Cllr Tony Wells)	Keyworth Parish Council
27209889	Thrumpton Parish Meeting (Mr Ben Wilson)	Thrumpton Parish Meeting
27221921	Sport England (Mr Steve Beard)	Sport England
27194945	Severn Trent - Sewerage Management Planning (Mr Chris Bramley)	Severn Trent - Sewerage Management Planning
27215169	Theatres Trust (Mr Tom Clarke MRTPI)	Theatres Trust
29769377	Homes England (Mr Brendon Dale)	Homes England
27196865	Canal & River Trust (Mr Ian Dickinson)	Canal & River Trust
27220641	National Farmers Union (Mr Simon Fisher)	National Farmers Union
27221985	Highways England (Mr Steve Freek)	Highways England
27225185	High Speed Two (HS2) Limited (Mr Reiss Graham)	High Speed Two (HS2) Limited
27190465	Defence Infrastructure Organisation (MOD) (Mr Paul Hinton)	Defence Infrastructure Organisation (MOD)
27187233	Natural England (Sir/ Madam)	Natural England
27192001	Historic England (Sir/ Madam)	Historic England
27211809	NHS Nottingham West Clinical Commissioning Group (Sir/ Madam)	NHS Nottingham West Clinical Commissioning Group
27215265	The Coal Authority (Sir/ Madam)	The Coal Authority
27218113	Environment Agency (Mr Rob Millbank)	Environment Agency

### Other Consultees

Respondent ID	Respondent Name	Respondent Organisation
29552193	Rushcliffe Borough Council (Cllr Abby Brennan)	Rushcliffe Borough Council
29392225	equipped2succeed and Second Chance Learning Academy (Ms Beverley Burton)	equipped2succeed and Second Chance Learning Academy
31943425	Rushcliffe Borough Council - Keyworth and Wolds Ward (Cllr John Cottee)	Rushcliffe Borough Council - Keyworth and Wolds Ward
31740641	Member of Parliament - Rushcliffe (Mrs Ruth Edwards)	Member of Parliament - Rushcliffe
31943457	Rushcliffe Borough Council - Keyworth and Wolds Ward (Cllr Andrew Edyvean)	Rushcliffe Borough Council - Keyworth and Wolds Ward
27180609	Cllr Andrew Ellwood	
29442465	Rushcliffe Borough Council (Councillor Mike Gaunt)	Rushcliffe Borough Council
32722305	Rushcliffe Borough Councillor (Cllr Penny Gowland)	Rushcliffe Borough Councillor
27222817	Home Builders Federation (HBF) (Ms Sue Green)	Home Builders Federation (HBF)
32390273	Calverton Parish Council (Mrs Joan Inger)	Calverton Parish Council
31943361	Rushcliffe Borough Council - Keyworth and Wolds Ward (Cllr Rob Inglis)	Rushcliffe Borough Council - Keyworth and Wolds Ward
32438785	Nottinghamshire Ramblers (Dr Sue Jones)	Nottinghamshire Ramblers
29429825	Councillor Leo Lanzoni	
29447745	Rushcliffe Green Party (Councillor Richard Mallender)	Rushcliffe Green Party
29456833	Cllr Gerald McMahon	
28984609	Mr Mario Molinari	
30139329	Councillor (Cllr Michael Payne)	Councillor
32484353	Grantham Canal Society (Michelle Storer)	Grantham Canal Society
29410273	RBC Leake Ward members (Cllr Carys Thomas)	RBC Leake Ward members
28980737	Rushcliffe Borough Council (Cllr Roger Upton)	Rushcliffe Borough Council

Respondent ID	Respondent Name	Respondent Organisation
29562305	Rushcliffe Borough Council (Cllr Jennifer Walker)	Rushcliffe Borough Council
30096385	Cllr Rex Walker	
29430401	Nottinghamshire County Council (Cllr Jonathan Wheeler)	Nottinghamshire County Council
30039713	Bumpkin Dairy co (Mrs Debra Willoughby)	Bumpkin Dairy co
29443553	Keyworth Conservation Area Advisory Group (Mrs Linda Abbey)	Keyworth Conservation Area Advisory Group
30044193	St James' Church NOS (Dr Sue Archbold)	St James' Church NOS
30081153	36th Nottingham (Special Needs) Guides and Rangers (Elizabeth Ashcroft)	36th Nottingham (Special Needs) Guides and Rangers
27224929	Tollerton Against Backdoor Urbanisation (TABU) (Dr Sue Ball)	Tollerton Against Backdoor Urbanisation (TABU)
28931201	British Horse Society (Wendy Bannerman)	British Horse Society
29445761	Edwalton Municipal Golf and Social Club (Mr Philip Barker)	Edwalton Municipal Golf and Social Club
29443169	www.GeoGreenPower.com (Mr Matthew Barney)	www.GeoGreenPower.com
29447777	The Cranmer Group of Parishes (Rev Tim Chambers)	The Cranmer Group of Parishes
30082913	Girlguiding Nottinghamshire (Sarah Clarkson)	Girlguiding Nottinghamshire
29413953	Burton Joyce Climate Action group (Julia Devonport)	Burton Joyce Climate Action group
27182561	Nottinghamshire Wildlife Trust (Mr Ben Driver)	Nottinghamshire Wildlife Trust
29437377	OSVAID (Orston & Surrounding Villages Against Inappropriate Development) (Mr ...	OSVAID (Orston & Surrounding Villages Against Inappropriate Development)
27217057	Burton Joyce Village Society (Mr Richard Fife)	Burton Joyce Village Society
27193025	Mrs Jane Fraser	
29379681	Diocese of Southwell and Nottingham (Michele Hampson)	Diocese of Southwell and Nottingham
30487969	Girlguiding Nottinghamshire (Kayleigh & Kirstie Hunt & Pogson)	Girlguiding Nottinghamshire
29447169	Nottingham Green Party (Mr Guy Jones)	Nottingham Green Party

<b>Respondent ID</b>	<b>Respondent Name</b>	<b>Respondent Organisation</b>
32128449	Mapperley all-stars coaching (Mr Nathan Kenney)	Mapperley all-stars coaching
28502721	Nottingham Local Access Forum (Margaret Knowles)	Nottingham Local Access Forum
27182785	Nottinghamshire Campaign to Protect Rural England (Ms Bettina Lange)	Nottinghamshire Campaign to Protect Rural England
27196577	Pedals (Nottingham Cycling Campaign) (Hugh McClintock)	Pedals (Nottingham Cycling Campaign)
27226113	Willow Farm Action Group (Mr Philip Oddie)	Willow Farm Action Group
27182657	Beeston and District Civic Society (Mrs Caroline Penn)	Beeston and District Civic Society
27201025	Dept. for Education (Mr John Pilgrim)	Dept. for Education
27186721	Nottingham Credit Union (Clive Rix)	Nottingham Credit Union
27211169	The Woodland Trust (Mr Nick Sandford)	The Woodland Trust
30030497	Regatta Way Sports Club (Mr Peter Stansbury)	Regatta Way Sports Club
27186017	Sharphill Action Group (SAG) (Ms Christine Turner)	Sharphill Action Group (SAG)
29565185	Thoroton & District Branch - Newark Conservative Association	Thoroton & District Branch - Newark Conservative Association
30044481	Meadow School of Riding (Mr Iain Whitmore-Kirby)	Meadow School of Riding
27207745	Nottingham Open Spaces Forum (Mr Martin Willis)	Nottingham Open Spaces Forum
29696193	Cllr Penny Gowland	Rushcliffe Borough Council
27178721	RAF Syerston (Wg Cdr Adey Hobson)	RAF Syerston
27217921	Rod Jones	Rushcliffe Borough Council
29825953	Cllr Shirley Lockwood	Orston Parish Council



### **Landowners/ Developers/ Agents**

<b>Agent ID</b>	<b>Agent Organisation</b>	<b>Respondent ID</b>	<b>Respondent Name</b>	<b>Respondent Organisation</b>
27180801	Andrew Hiorns Town Planning Limited	31652577	Parker Strategic Land Limited (site at Cotgrave) (Mr Andrew Bamber)	Parker Strategic Land Limited (site at Cotgrave)
27180801	Andrew Hiorns Town Planning Limited	31916897	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 Town Planning Limited	32033089	Parker Strategic Land Limited (Catstone Green site) (Mr Andrew Bamber)	Parker Strategic Land Limited (Catstone Green site)
0		31229377	D2H Land Planning Development Ltd (Ms Hannah Barter)	D2H Land Planning Development Ltd
27210913	Carter Jonas	29282881	Burhill Group Limited (Mr Andrew Bennett)	Burhill Group Limited
27204001	Carter Jonas	29282881	Burhill Group Limited (Mr Andrew Bennett)	Burhill Group Limited
27209953	Savills	32962817	Rushcliffe Borough Council	
0		27193825	Persimmon Homes (Mr George Breed)	Persimmon Homes
32960129	ID Planning	32960065	Mr John Breedon	
27193377	Pegasus Group	29738273	Hallam Land Management (Mr Paul Burton)	Hallam Land Management
27185569	Freeths	29738273	Hallam Land Management (Mr Paul Burton)	Hallam Land Management
27211137	GraceMachin Planning & Property	32671553	Conlon Construction (Nottm) Ltd	
29550177	Shouler & Son	29549985	Knights PLC (Mr Edward Cursham)	Knights PLC
29869569	Savills	32071713	Wilson Bowden Developments (Mr Michael Davies)	Wilson Bowden Developments
0		28336033	William Davis (Mr Tom Dillarstone)	William Davis
0		31980129	Gladman (Mr Michael Dinn)	Gladman

Agent ID	Agent Organisation	Respondent ID	Respondent Name	Respondent Organisation
0		29443009	Aspbury Planning (Mr Mike Downes)	Aspbury Planning
27224961	JVH Town Planning Consultants Ltd	32393569	Executors of Evelyn Shepperson	
27178785	Oxalis Planning	28258945	Bloor Homes Midlands (Ms Kate Fell)	Bloor Homes Midlands
29685441	DLP Planning Ltd	29685537	City Estates (Mr Dale Fixter)	City Estates
27194657	Geoffrey Prince Associates Ltd	27189217	Langridge Homes Ltd (Mr David Fletcher)	Langridge Homes Ltd
27224609	Stantec (formerly Peter Brett Associates)	29687297	Barwood Homes (Mr Ned Fox)	Barwood Homes
0		27218337	Barratt David Wilson Homes (Mr Robert Galij)	Barratt David Wilson Homes
0		29684865	Inspired Villages (Mr Stuart Garnett)	Inspired Villages
0		27211137	GraceMachin Planning & Property (Mr Nick Grace)	GraceMachin Planning & Property
29363745	Star Planning	28528833	Woolbro Morris (Mr Jonathan Greenberg)	Woolbro Morris
0		32965857	Mrs Sheila Hall	
27188993	Marrons Planning	31711169	Whitefields Farm (Mr & Mrs Hammond)	Whitefields Farm
27194657	Geoffrey Prince Associates Ltd	27200001	Hammond Farms (Mr Robert Hammond)	Hammond Farms
27180129	Mather Jamie	30121537	Paget Estate (Miss Joanna Herbert-Stepney)	Paget Estate
28503137	Boyer	31493889	Mr David Herrick	
27181057	Fisher German LLP	32950817	Mr Malcolm Hodgkinson	
29620865	Planning & Design Group (UK) Limited	29620769	The University of Nottingham (Ms Annabel Holmes)	The University of Nottingham
0		32952897	Endurance Estates (Mr Tim Holmes)	Endurance Estates

Agent ID	Agent Organisation	Respondent ID	Respondent Name	Respondent Organisation
27224993	nineteen47	29994977	Richborough Estates (Burnside Grove, Tollerton) (Mr Steve Louth)	Richborough Estates (Burnside Grove, Tollerton)
27224993	nineteen47	31990401	Richborough Estates (Land off Oxton Road, Calverton) (Mr Steve Louth)	Richborough Estates (Land off Oxton Road, Calverton)
29783777	Savills	31993633	Taylor Wimpey (Land West of Ruddington) (Sir/ Madam)	Taylor Wimpey (Land West of Ruddington)
29783777	Savills	31993921	Taylor Wimpey (Land north-west of East Bridgford) (Sir/ Madam)	Taylor Wimpey (Land north-west of East Bridgford)
29783777	Savills	31997313	Taylor Wimpey (Land East of Gamston) (Sir/ Madam)	Taylor Wimpey (Land East of Gamston)
31543393	Fisher German LLP	31543553	Samworth Farms Limited (Sir/ Madam)	Samworth Farms Limited
31543393	Fisher German LLP	31921185	Landowner east of Mansfield Road, Eastwood (Sir/ Madam)	Landowner east of Mansfield Road, Eastwood
31543393	Fisher German LLP	31921793	Landowner north of Nuthall (Sir/ Madam)	Landowner north of Nuthall
29749345	Savills	29749313	Gaintame Ltd (Sir/ Madam)	Gaintame Ltd
27209953	Savills	32000449	Wilson Bowden Developments (Land at New Farm, Nuthall) (Sir/ Madam)	Wilson Bowden Developments (Land at New Farm, Nuthall)
27209953	Savills	32000545	Wilson Bowden Developments (Land West of Woodhouse Way) (Sir/ Madam)	Wilson Bowden Developments (Land West of Woodhouse Way)
27196833	Turley	31603457	IM Land (Sir/ Madam)	IM Land
31820801	Avison Young	31820929	Homes England and the Defence Infrastructure Organisation (Sir/ Madam)	Homes England and the Defence Infrastructure Organisation
27180385	Marrons Planning	29765697	Mather Jamie Ltd (Sir/ Madam)	Mather Jamie Ltd
27180385	Marrons Planning	31756705	Braemore Group and Mr Knibb (Sir/ Madam)	Braemore Group and Mr Knibb
27211137	GraceMachin Planning & Property	29820737	DSL Holdings Ltd (Sir/ Madam)	DSL Holdings Ltd
27223393	Bidwells	29768033	Trinity College (Sir/ Madam)	Trinity College

Agent ID	Agent Organisation	Respondent ID	Respondent Name	Respondent Organisation
29559169	Pegasus Group	31819681	Loughborough Road Consortium (Sir/ Madam)	Loughborough Road Consortium
28503137	Boyer	31583073	Michael Machin, Gaintame Limited, Wheatcroft Farm Limited, John A Wells Limit...	Michael Machin, Gaintame Limited, Wheatcroft Farm Limited, John A Wells Limited
28503137	Boyer	31873761	Stagfield Group (Sir/ Madam)	Stagfield Group
28503137	Boyer	31879169	Harworth Group (Sir/ Madam)	Harworth Group
28503137	Boyer	31915105	Strawsons Group Investments Ltd (Sir/ Madam)	Strawsons Group Investments Ltd
27178785	Oxalis Planning	29747809	John A Wells Ltd (Sir/ Madam)	John A Wells Ltd
27178785	Oxalis Planning	29748289	South West Nottingham Consortium (Sir/ Madam)	South West Nottingham Consortium
27178785	Oxalis Planning	30852769	Oxalis Planning on behalf of unnamed landowners and developers (Sir/ Madam)	Oxalis Planning on behalf of unnamed landowners and developers
27178785	Oxalis Planning	31849281	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	Savills (UK) Ltd	29994881	Landowner Consortium (south of Orston) (Sir/ Madam)	Landowner Consortium (south of Orston)
31740865	Avison Young	32093729	Jelson Homes and the Wheatcroft Family (Sir/ Madam)	Jelson Homes and the Wheatcroft Family
31711553	Andrew Granger and Co	31711265	The Hill Family (Sir/ Madam)	The Hill Family
30248385	Wood PLC	31650465	Crown Estate (Sir/ Madam)	Crown Estate
29765729	Nexus Planning	29765697	Mather Jamie Ltd (Sir/ Madam)	Mather Jamie Ltd
29765729	Nexus Planning	29767009	CEG Land Promotions I (UK) Ltd (Sir/ Madam)	CEG Land Promotions I (UK) Ltd
27181057	Fisher German LLP	31923105	Taylor Wimpey (Land at Chilwell Lane, Bramcote) (Sir/ Madam)	Taylor Wimpey (Land at Chilwell Lane, Bramcote)
27181057	Fisher German LLP	32073441	The Trustees of the Locko 1991 Settlement (Sir/ Madam)	The Trustees of the Locko 1991 Settlement

Agent ID	Agent Organisation	Respondent ID	Respondent Name	Respondent Organisation
27180161	Pegasus Group	31820897	Nottinghamshire County Council and Hallam Land Management (Sir/ Madam)	Nottinghamshire County Council and Hallam Land Management
31870113	Barton Willmore	31870273	JG Woodhouse & Sons (Sir/ Madam)	JG Woodhouse & Sons
31870113	Barton Willmore	31923745	FH Farms Ltd (Sir/ Madam)	FH Farms Ltd
27188993	Marrons Planning	31704993	Crofts Development Ltd (Sir/ Madam)	Crofts Development Ltd
27188993	Marrons Planning	31709665	Davidsons Developments Ltd (Aslockton) (Sir/ Madam)	Davidsons Developments Ltd (Aslockton)
27188993	Marrons Planning	31710817	Davidsons Developments Ltd (Gotham) (Sir/ Madam)	Davidsons Developments Ltd (Gotham)
27188993	Marrons Planning	31710913	Davidsons Developments Ltd (Land South of Gamston) (Sir/ Madam)	Davidsons Developments Ltd (Land South of Gamston)
27188993	Marrons Planning	31711105	Harris Land Management (Sir/ Madam)	Harris Land Management
27188993	Marrons Planning	31733601	Davidsons Developments Ltd (Cropwell Bishop interest) (Sir/ Madam)	Davidsons Developments Ltd (Cropwell Bishop interest)
29445185	JW Planning Ltd	29743457	Hall Construction Services Ltd (Sir/ Madam)	Hall Construction Services Ltd
27224609	Stantec (formerly Peter Brett Associates)	27202593	Barwood Land (Ms Julie Morgan)	Barwood Land
32930337	Ridge and Partners LLP	27202593	Barwood Land (Ms Julie Morgan)	Barwood Land
28503137	Boyer	31933377	Mr Stubbs and Mr Whittington	
27183265	Planning and Design Group (UK) Limited	30045249	The Trustees for the Estate of Mrs Joan Winifred Briggs	
27217537	Richard Ling & Associates	32829441	Mr and Mrs Myles	
27205793	Savills UK Ltd	30121281	Mr C Nott	
0		29471393	Penland Estates (Mr Matt Oliver)	Penland Estates
0		32717889	Hollins Strategic Land (Mr Christian Orr)	Hollins Strategic Land
29994817	Savills (UK) Ltd	30853537	Mr and Mrs Peacock	

Agent ID	Agent Organisation	Respondent ID	Respondent Name	Respondent Organisation
0		29685313	David Wilson Home East Midlands (Mr David Prowse)	David Wilson Home East Midlands
30286849	Simon Heaton, Planning Consultant	32484449	Mr S Raynor	
0		27180865	Uniper UK Limited (Dr Andy Read)	Uniper UK Limited
0		29821921	British Gypsum (Jennifer Saunders)	British Gypsum
27213121	Stone Planning Services	27225889	Aldergate Properties Ltd (Mr Wayne Scholter)	Aldergate Properties Ltd
31730881	Boyer	32837729	Knightwood Developments Limited (Haydn Short)	Knightwood Developments Limited
0		27213121	Stone Planning Services (Mr Paul Stone)	Stone Planning Services
27181057	Fisher German LLP	32950049	Joanna Szejter	
27178785	Oxalis Planning	29749921	Richard Taylor	
0		27214049	Peter Tyers Associates (Mr Peter Tyers)	Peter Tyers Associates
0		27207777	Positive Homes Ltd (Mr Martin Valentine)	Positive Homes Ltd
27193857	GraceMachin Planning & Property	29408225	Mr S and C Voce	
0		27222593	Mr Stephen Walker	
32962465	Q&A Planning Ltd	27220737	Newton Nottingham LLP (Mr Simon Waterfield)	Newton Nottingham LLP
27178785	Oxalis Planning	27193633	W Westerman Ltd (Mr Robert Westerman)	W Westerman Ltd
27207489	Define	27208385	Bloor Homes (Mr Max Whitehead)	Bloor Homes
32966241	WSP	32966145	Global Mutual (on behalf of The Victoria Centre Partnership) (Ms Alison Woodall)	Global Mutual (on behalf of The Victoria Centre Partnership)

***Residents***

652 residents provided representations. Their names have not been published in accordance with the Data Protection Policy in place during the consultation.

39 additional responses were received from respondents. These were anonymous responses. 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 Growth Options Report of Responses.

## Appendix 2: Greater Nottingham Strategic Plan Preferred Approach - List of Respondents

### *Statutory Consultees*

Agent ID	Agent Organisation	Respondent ID	Respondent Organisation
		44676257	Ashfield DC
		29426753	Barton in Fabis Parish Council
		27196865	Canal & River Trust
		32655425	Chetwynd: The Toton and Chilwell Neighbourhood Forum
		27215361	Derbyshire County Council
		31675393	East Leake Parish Council
		44305089	Environment Agency
		27215393	Erewash Borough Council
		44907425	Historic England
44659105	Avison Young	44663745	Homes England
		32618945	Kingston on Soar Parish Council
37913473	Lucy White Planning	44591073	National Grid Electricity Distribution (South West) Plc
		44843809	National Highways
		44474497	Natural England
		27211617	Nottinghamshire CC
		29827105	Ratcliffe on Soar Parish Meeting
		27212065	Ruddington Parish Council
		27221921	Sport England
		27215265	The Coal Authority



**Landowners/ Developers/ Agents**

Agent ID	Agent Organisation	Respondent ID	Respondent Name/Organisation
		44322113	AA Homes&Housing Ltd
		27218337	Barratt David Wilson Homes
29783777	Savills	31993633	Taylor Wimpey (Land West of Ruddington)
		44677825	Home Builders Federation
27207489	Define	27208385	Bloor Homes
41874721	Marrons Planning	44688129	Havenwood Construction Limited
29783777	Savills	31997313	Taylor Wimpey and Barwood (Land East of Gamston)
41874721	Marrons Planning	44688225	Havenwood Construction Limited
41874721	Marrons Planning	44687809	Davidsons Developments Limited (Gotham)
41874721	Marrons Planning	44687169	Davidsons Developments Limited (Aslockton)
44697569	Marrons Planning	44700353	Marrons Planning (Keyworth and Kinoulton)
41874721	Marrons Planning	44687873	Davidsons Developments Limited (Cropwell Bishop)
44697569	Marrons Planning	44701505	Mather Jamie (Sutton Bonington)
41874721	Marrons Planning	44687041	Davidsons Developments Limited (Tollerton SUE)
44707425	Boyer Planning	44707809	Knightwood Developments Ltd
44237153	Pegasus Group	44323649	Hallam Land Management Limited
44707425	Boyer Planning	44708801	Herrick & Mattock
44707425	Boyer Planning	44708897	Barratt David Wilson Homes (North Midlands), Wheatcroft Farm Ltd and John A Wells Ltd
44697569	Marrons Planning	44714401	Metacre (Bunny)
		27202593	Barwood Land
44697569	Marrons Planning	44716097	Metacre (Calverton)
44709473	DLP Planning Limited	44711265	Persimmon Homes
44707425	Boyer Planning	44709057	Omnivale Pension Scheme and Peveril Securities
44702177	Turley	44715137	Bellway Homes Limited c/o Turley
44707425	Boyer Planning	44724513	Mrs Hill & Mrs Plummer
44237153	Pegasus Group	44588833	Harworth Group Plc

Agent ID	Agent Organisation	Respondent ID	Respondent Name/Organisation
41322785	Savills (UK) Ltd	44668353	Elton Garden Village Landowner Consortium c/o Savills (UK) Ltd
27204801	Fisher German LLP	44692097	Bloor Homes
27194657	Geoffrey prince Associates Ltd	27189217	Langridge Homes Ltd
27194657	Geoffrey prince Associates Ltd	27200001	Hammond Farms
		44683457	Gladman Developments Ltd
44689409	Turley	31603457	IM Land
44237569	Zesta Planning Ltd	44658145	West Bridgeford Hockey Club
38760865	Evolve Planning & Design	44237505	Bloor Homes
27211137	GraceMachin Planning & Property	27211137	GraceMachin Planning & Property
		42098177	Mulberry Land
		27225889	Aldergate Properties Ltd
44659105	Avison Young	31820929	Homes England and the Defence Infrastructure Organisation
44163777	WSP	44689825	Global Mutual (on behalf of Victoria Centre Ltd)
42116257	Boyer	44668385	Harworth Group
42116257	Boyer	44668417	Strawson Group Investments Ltd
27218209	Oxalis Planning	44692161	Oxalis Planning
27218209	Oxalis Planning	44692097	Bloor Homes
29445185	JW Planning Ltd	29743457	Hall Construction Services Ltd
44706817	ID Planning	44706945	John Breedon
27224609	Stantec	44708001	Cora
44123841	Savills (UK) Limited	40336897	David Wilson Homes, East Midlands
44711425	Q+A Planning	44711777	Newton Nottingham LLP
44659201	Mather Jamie	44713025	C/O Mather Jamie Ltd
		44639873	Andrew Granger & Co
44237153	Pegasus Group	44237505	Bloor Homes

Agent ID	Agent Organisation	Respondent ID	Respondent Name/Organisation
44436129	Pegasus Group	44440481	Nottinghamshire County Council and Hallam Land Management Ltd.
44472033	Ridge and Partners LLP	44695457	Mather Jamie on behalf of Parker Strategic Land Ltd
44720001	Pegasus Group	44721601	Keepmoat Homes
		44404897	Barwood Development Securities Ltd
42116257	Boyer	44714561	Stagfield Group
44605345	Savills	44724929	Ceylon Tea Growers Association Ltd
44677217	Star Planning and Development	44683265	Woolbro Morris
44765377	Barton Willmore (now Stantec)	32033089	Parker Strategic Land Limited (Catstone Green site)
44628321	WSP	44706273	The Crown Estate
42298945	rg+p Ltd	44697505	Midlands Land Portfolio Ltd
44825825	Fisher German LLP	32950817	Malcolm Hodgkinson
41090081	TOR	28336033	William Davis
44825825	Fisher German LLP	31923105	Taylor Wimpey (Land at Chilwell Lane, Bramcote)
41547137	Nexus Planning	29767009	CEG Land Promotions I (UK) Ltd
27223393	Bidwells	29768033	Trinity College
31543393	Fisher German LLP	31543553	Samworth Farms Limited
44619649	nineteen47	44633793	Hallam Land Management
		29749345	Savills (UK) Ltd
44676641	Planning Prospects Ltd	44676673	Richborough Estates
		44541633	The Planning Bureau
27218209	Oxalis Planning	44692001	John A Wells Limited
41874721	Marrons Planning	44688833	Avant Homes, David Wilson Homes, Davidsons, Gladman, IM Land, Redrow, Richborough Estates & Wm Davis
44710561	Barton Willmore now Stanec	44710849	Tejpartap Singh Sahota
27221569	Avison Young	44725153	Northern Trust Ltd

Agent ID	Agent Organisation	Respondent ID	Respondent Name/Organisation
42631841	Mike Downes Planning Consultant	44434113	Omnivale Ltd / Newsholme Developments
		44607425	Oxalis Planning
27209953	Savills	32000449	Wilson Bowden Developments (Land at New Farm, Nuthall)
44877473	Nexus Planning	29767009	CEG Land Promotions I (UK) Ltd
		44587489	Brinsley Land Trust
		44218433	Defence Infrastructure Organisation
44711425	Q+A Planning	27220737	Newton Nottingham LLP
27213121	Stone Planning Services	44812673	Peveril Securities Limited
		44700353	Marrons Planning
44123841	Savills (UK) Limited	29685313	David Wilson Home East Midlands
		44434113	Omnivale Ltd / Newsholme Developments
		44724289	Chloe Langley
		44724929	Ceylon Tea Growers Association Ltd
		29821921	British Gypsum
		44715361	Ministry of Defence - Defence Infrastructure Organisation Safeguarding
27223393	Bidwells		
27218209	Oxalis Planning	44692065	Richard Taylor
27202145	Savills	44710657	Rachel Salmon

**Non-Statutory Consultee Groups and Individuals**

<b>Respondent ID</b>	<b>Respondent Organisation</b>
28931201	British Horse Society
27221857	Friends of Moor Pond Woods
44032737	Grantham Canal Society
44421665	Grantham Canal Society
44362433	Nottingham Council of Mosques
28502721	Nottingham Local Access Forum
41501857	Nottingham Students' Partnership
27226433	Radcliffe-on-Trent Residents' Association
44636321	The Woodland Trust
29410273	RBC Leake Ward Members
30096385	RBC Gotham Ward Member
43808385	Roodsafe
44686241	ADC Council Member for Hucknall
44688321	ADC Council Member for Hucknall
44688769	ADC Council Member for Hucknall
44688993	ADC Council Member for Hucknall
44689089	ADC Council Member for Hucknall
44719777	Lidl GB Ltd
43898657	Rentplus UK
31740641	Member of Parliament - Rushcliffe
43826561	Gedling Borough Councillor
44878721	RBC Sutton Bonington Ward Member

***Residents***

49 residents provided representations. Their names have not been published in accordance with the Data Protection Policy in place during the consultation.

## Appendix 3: Strategic Distribution and Logistics - List of Respondents

### *Respondent Organisations or Companies*

Respondent ID	Respondent Organisation / Company	Respondent Type
30794305	Alverton and Kilvington Village Meeting	Statutory consultee
29435841	Amber Valley Borough Council	Duty to cooperate Council
27219777	Arquiva	Landowner/developer/agent
44676257	Ashfield DC	Duty to cooperate Council
34094305	Avison Young	Landowner/developer/agent
41842913	Avison Young	Landowner/developer/agent
27186657	Awsworth Parish Council	Duty to cooperate Parish
29426753	Barton in Fabis Parish Council	Duty to cooperate Parish
28503137	Boyer	Landowner/developer/agent
44453665	Boyer Planning	Landowner/developer/agent
27226561	BT Wholesale	Statutory consultee
29282881	Burhill Group Limited	Landowner/developer/agent
49845409	CarneySweeney	Landowner/developer/agent
27217121	Central Networks	Statutory consultee
32655425	Chetwynd: The Toton and Chilwell Neighbourhood Forum	Duty to cooperate Parish
27178849	Civil Aviation Authority	Statutory consultee
27215361	Derbyshire County Council	Duty to cooperate Council
27226593	Derbyshire Police and Crime Commissioner	Statutory consultee
27193921	DIO Operations	Statutory consultee
27188193	E.ON	Statutory consultee
31675393	East Leake Parish Council	Duty to cooperate Parish
29430369	Edwalton Municipal Golf & Social Club	Residents/specialist group
32952897	Endurance Estates	Landowner/developer/agent
44305089	Environment Agency	Statutory consultee

Respondent ID	Respondent Organisation / Company	Respondent Type
27194657	Geoffrey prince Associates Ltd	Landowner/developer/agent
27194625	Gotham Parish Council	Duty to cooperate Parish
44323649	Hallam Land Management Limited	Landowner/developer/agent
27200001	Hammond Farms	Landowner/developer/agent
27228033	Harworth Group	Landowner/developer/agent
44588833	Harworth Group Plc	Landowner/developer/agent
44701921	Herrick & Mattock	Landowner/developer/agent
44907425	Historic England	Statutory consultee
45131297	Home Builders Federation	Landowner/developer/agent
50099489	Hortons' Estate Limited	Landowner/developer/agent
48339553	Iceni Projects	Landowner/developer/agent
32093729	Jelson Homes and the Wheatcroft Family	Landowner/developer/agent
27226529	JHWalter LLP	Landowner/developer/agent
32618945	Kingston on Soar Parish Council	Duty to cooperate Parish
32837729	Knightwood Developments Limited	Landowner/developer/agent
44701889	Knightwood Developments Ltd	Landowner/developer/agent
28502881	Lambert Smith Hampton	Landowner/developer/agent
27189217	Langridge Homes Ltd	Landowner/developer/agent
27226625	Leicestershire Police and Crime Commissioner	Statutory consultee
27205409	Mansfield District Council	Duty to cooperate Council
50102561	Member of Parliament for Rushcliffe	Other consultee
44697505	Midlands Land Portfolio Ltd	Landowner/developer/agent
27218497	Ministry of Defence	Statutory consultee
42098177	Mulberry Land	Landowner/developer/agent
27215553	National Grid UK Transmission	Statutory consultee
44843809	National Highways	Statutory consultee
44474497	Natural England	Statutory consultee
27228065	Netherfield Forum	Residents/specialist group
27208257	Newark and Sherwood District Council	Duty to cooperate Council



Respondent ID	Respondent Organisation / Company	Respondent Type
29884289	Normanton on Soar Parish Council	Duty to cooperate Parish
27214977	North West Leicestershire District Council	Duty to cooperate Council
27182785	Nottinghamshire Campaign to Protect Rural England	Residents/specialist group
27182561	Nottinghamshire Wildlife Trust	Residents/specialist group
44701793	Omnivale Pension Scheme & Peveril Securities	Landowner/developer/agent
27211073	Openreach	Other consultee
44607425	Oxalis Planning	Landowner/developer/agent
27196577	Pedals (Nottingham Cycling Campaign)	Residents/specialist group
42872033	Pegasus Group	Landowner/developer/agent
44237153	Pegasus Group	Landowner/developer/agent
44812673	Peveril Securities Limited	Landowner/developer/agent
50096577	Peveril Securities Limited & Omnivale Pension Scheme	Landowner/developer/agent
29827105	Ratcliffe on Soar Parish Meeting	Duty to cooperate Parish
30096385	Rushcliffe Borough Council	Other consultee
50045985	Severn Trent Green Power	Statutory consultee
50058753	Sport England	Statutory consultee
27215265	The Coal Authority	Statutory consultee
49782689	The Gardens Trust	Residents/specialist group
32073441	The Trustees of the Locko 1991 Settlement	Landowner/developer/agent
29620769	The University of Nottingham	Landowner/developer/agent
27209889	Thrumpton Parish Meeting	Duty to cooperate Parish
27180865	Uniper UK Limited	Landowner/developer/agent
41373889	Wilson Bowden	Landowner/developer/agent
32071713	Wilson Bowden Developments	Landowner/developer/agent

### **Residents**

110 local residents provided representations. Their names have not been published in accordance with the Data Protection Policy in place during the consultation.