

Greater Nottingham  
Planning Partnership



# Preferred Approach: Response to the Growth Options Consultation

December 2022



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## Introduction

### 1. Background

- 1.1. Broxtowe Borough, Gedling Borough, Nottingham City and Rushcliffe Borough Councils published the Greater Nottingham Strategic Plan (GNSP) Growth Options document in July 2020. The consultation documents also included the Growth Options Study (produced by AECOM) and the Sustainability Assessment Scoping Report.
- 1.2. This was the first stage of producing the Strategic Plan and asked a series of questions on topics including housing growth, employment growth and economic development, climate change and carbon neutrality, city and town centres, the natural environment, urban design, the historic environment, safe and healthy communities, Green Belt and infrastructure provision.
- 1.3. The first consultation was undertaken for 10 weeks between 6th July and 14th September 2020. From 10th February 2021 to 24th March 2021 an extended consultation period was carried out after the Councils were made aware that some comments submitted by email had been blocked by security software and had not been received.
- 1.4. The Report of Consultation Responses was published in February 2022 and provided a summary of the comments received as part of the consultations.
- 1.5. This document “Preferred Approach: Response to the Growth Options Consultation (September 2022)” provides the Councils’ response to the consultation comments for matters relating to the Preferred Approach consultation; the proposed strategy and vision, the approach to housing and employment provision and the proposed strategic sites.
- 1.6. For matters not relating to this consultation, responses will be provided as part of the Publication Draft of the Strategic Plan.

## Chapter One: Vision

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

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

The Vision and the Spatial Objectives relating to Housing and Employment are contained within the Preferred Approach document.

The importance of ensuring new development contributes to carbon neutrality or net zero carbon standards and provides net environmental gain in line with the Environment Bill is supported and is emphasised in the Vision.

The ongoing response and recovery from Covid-19 is a strategic issue which is reflected in the Preferred Approach and within the Vision. A further review of the impact of Covid on the economy and town centres and the effect on sustainable development will be addressed as part of preparing the Publication Draft of the Strategic Plan. It is acknowledged that it is not limited to economic development matters but also changing housing needs, travel patterns and reduced demand for retail in shopping centres.

It is proposed to include flood risk, pollution and air quality within the objectives. These matters have been considered as part of the Sustainability Appraisal and site selection process. Further details regarding site specific policies will be included in the Publication Version of the Strategic Plan.

Matters relating to housing delivery and the importance of increasing the supply of land available for new homes where required to address affordability pressures, support economic growth and renewal of towns and city is reflected in the Vision, the Objectives and in the preferred approach to housing.

It is acknowledged that there is concern over outstanding planning permissions not being developed and each partner authority has reviewed their housing supply through the SHLAA and/or Housing Delivery Action Plans.

It is agreed that a combination or blend of growth options will be required in order to address the range of issues and to meet sustainable development needs including limiting significant growth in commuting. The distinctive role of key settlements is recognised and the importance of avoiding piecemeal development is supported.

Economic changes such as Brexit have been considered as part of the Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study (May 2021). The importance of East Midlands Airport and designation as the new Freeport to the regional economy is recognised in addition to the major development potential at Toton and Ratcliffe on Soar power station.

The role of the Universities in supporting and delivering growth is also acknowledged and is reflected in the Vision and approach to employment. Developing the area as a tourist destination and importance of start-up and development of small-medium businesses is also supported.

It is agreed that local heritage assets should be recognised and that a reference to the historic environment under guiding good place making should be included in the Publication Version of the Strategic Plan.

The importance of agricultural land and locally sourced crops is recognised as well as the added value for the environment, social and recreation purposes and has been taken into consideration through the Sustainability Appraisal and the site selection process.

The protecting, enhancing and providing new Blue and Green Infrastructure is a central element to the Preferred Approach. The importance of protecting the natural environment and local wildlife and need for overarching objectives to increase Natural Capital is supported.

The provision of the right type and well-designed new homes to meet the diverse needs of communities across the Plan area is supported and reflected in the Housing Objective. The significance of guiding good place making retaining and reflecting local distinctiveness and character to create sustainable places that people want to live and work in and that are well connected with the rest of the area to reduce the need to travel is supported. Good design is a key aspect of sustainable development and should contribute to making places better and reduce opportunities for crime. Further details regarding design will be included in Publication Version of the Strategic Plan.

Sustainable transport will be at the heart of good growth with the aim of reducing vehicle trips. The importance of active travel and the provision for cycling and walking and the inclusion of cycle lanes is accepted where feasible and practicable. Accessibility, including active travel, has been considered as part of the site selection process.

The Infrastructure Delivery Plan will support the Publication Version of the Strategic Plan and will identify initial requirements and expectations to support housing, economic growth and leisure activity for the area.

A comprehensive policy around the handling, reduction, reuse and recycling of waste that is capable of managing the waste produced by Greater Nottingham will be considered through the Joint Waste Local Plan.

The comments from the Department for Education were noted and the proposal to work closely with local education departments and planning authorities to meet the demand for new school places and new schools is welcomed. It is agreed that the Plan needs to be positively prepared to meet the objectively assessed development needs and infrastructure requirements.

The strengthening of linkages between the Greater Nottingham and Derbyshire HMAs is supported. The advantages of a comprehensive approach to strategic planning across the whole of Greater Nottingham including Ashfield and Erewash is supported and is shown through the continued preparation of a common evidence base.

2. **Question INT2: Evidence Base**

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

The Preferred Approach document identifies the main components of the evidence base and the evidence base will continue to be developed as the Plan develops. Respondents suggested a variety of additional evidence to support the Plan. Evidence has been included to ensure that the Plan is based on comprehensive evidence which is robust and also up-to-date assessments which will be adequate and proportionate in accordance with the NPPF.

Additional evidence on climate change, including the understanding of the local impacts and commitments to reduce Green House Gas emission and carbon neutrality, will be incorporated into the evidence base. Ongoing discussions with the Environment Agency and Local Lead Flood Authority will continue with respect to flooding assessments and flood defence proposals.

The use of the standard method to determine the level of housing need is recognised and will be presented in a housing trajectory. It is agreed that policy requirements resulting in technical standards and prescriptive housing types and tenures will be justified through detailed evidence. An agreed SHLAA methodology between the Greater Nottingham authorities has been prepared. This consistent approach provides robust evidence for the Strategic Plan housing supply.

The Employment Land Needs Study provides economic and employment related evidence and an additional Logistics Study has been undertaken to assess logistic and distribution needs. This evidence has been used to inform the preferred approach to employment.

A strategic transport assessment of the development proposals will be undertaken in advance of the Publication Version of the Strategic Plan.

In terms of the Landscape Character Assessment it is noted that an appraisal of the sensitivity of the local landscape to development has been undertaken through the Growth Options Study and additional work has been undertaken as part of preparing the Preferred Approach.

Designated sites of biodiversity value are shown on the Local Plan Policy Maps and the significance of the Environment Act is recognised. It is also confirmed that biodiversity net gain principles will be taken into consideration and further details will be provided in the Publication Version of the Strategic Plan.

Heritage Impact Assessments have been undertaken for all the reasonable alternative sites.

Local and Neighbourhood Plans already form part of the evidence base.

A targeted Green Belt Review has been undertaken to ensure that the currently designated Green Belt meets the purposes as set out within national planning policy and takes into account development or planned development occurring since the completion of the previous assessments.

### 3. **Question INT3: Strategic Issues**

Are there any other Strategic Issues we should consider?

Responses referred to the advantages of a comprehensive approach to strategic planning across the whole of Greater Nottingham including Erewash and Ashfield. The Councils are working closely with Erewash and Ashfield through the Greater Nottingham Planning Partnership and the Joint Planning Advisory Board and are producing a joint evidence base to cover strategic issues.

The response and recovery from Covid, including lifestyle and employment changes, are being considered as part of the preparation of the Strategic Plan and there is specific reference within the Vision and Objectives.

It is acknowledged that the Councils have declared a climate emergency and policies will provide a steer to developers and other stakeholders as to what is expected from new development, to help meet demanding targets for tackling climate change and reduce carbon dioxide emissions. Further details will be provided in the Publication Version of the Strategic Plan.

The need to avoid areas that are increasingly susceptible to the impact of climate change is supported and the importance of a clear understanding of flood risk to the area is paramount including the use of natural systems to mitigate against flooding. Flood risk has been included as a separate criterion in the Sustainability Appraisal.



Managing travel demand will be an important tool to mitigate the effects of carbon emissions and also to reduce the harm from noise and air pollution.

In respect of comments relating to evidence for housing need and supply, updated SHLAAs have been prepared using a common methodology. Choices over where strategic growth should go have been informed by the Sustainability Appraisal and other technical evidence based documents as part of the plan preparation process as well as the views of local people and other stakeholders.

The provision of the right type and well-designed new homes to meet the diverse needs of communities is supported. Good design is inherently a key aspect of sustainable development and will contribute to making places better. A specific design policy will be contained within the Publication Version of the Strategic Plan.

It is noted that the full delivery of strategic sites may not have concluded until after 2038. The NPPF is clear that the delivery of large scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset.

The importance of being aspirational in order to meet the Government's economic growth strategy is acknowledged and the need for a strategy which stimulates, encourages and attracts employment is supported. The Strategic Economic Plan for the D2N2 Local Enterprise Partnership identifies the economic and growth ambitions and high priority strategies for the area up to 2030. The benefits of the major development potential at Toton and at Ratcliffe-on-Soar Power Station are recognised within the preferred approach to employment.

The redevelopment of brownfield sites, including the rejuvenation of existing housing, is considered a priority for the Plan and has been considered as part of developing the preferred Planning Strategy and as part of the site selection and SA process.

The importance of ensuring vibrancy and diversity of uses within the city and town centres is supported although the impact of Coronavirus restrictions and the uncertainty of town centre prospects in the short term is acknowledged. Further details regarding the approach to city and town centres and to retail will be included in the Publication Version of the Strategic Plan.

The protection of the natural environment and local wildlife and enhancement of biodiversity was highlighted and this forms a central part of the preferred approach. The importance of green recreational space is also recognised in terms of having a positive impact on people's mental and physical wellbeing.

It is agreed that built heritage is more than protection of structures and can form part of heritage-led regeneration developments. The importance of

heritage is emphasised in the Vision. Further details regarding the approach to heritage will be included in the Publication Version of the Strategic Plan.

Responses emphasised that sustainable transport and decarbonising transport should be at the heart of good growth, including delivering an integrated network of safe walking and cycling routes. This is reflected in the “20-minute neighbourhood” concept which is a key component of the Preferred Approach, ensuring better access to homes, jobs, services and nature.

The Infrastructure Delivery Plan will support the Plan review and will identify initial requirements and timing of infrastructure. Judgements made will be based on current capacity and forecasts for the future which includes consideration of existing transport constraints.

## Chapter Two: Overall Strategy

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

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

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

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

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

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

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

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

Response to Questions OS1; OS2; OS3 and OS4:

OS1 was the most widely supported option in the consultation, particularly by Parish Councils, but also some developers. However, many in the development community recognised that a blend of the various options would be the most sustainable strategy. Some commentators argued that an over reliance on Sustainable Urban Extensions should be avoided, due to delivery difficulties with those already allocated.

All four options performed reasonably well in terms of the Sustainability Appraisal, with OS1 (Option A Main built Up Area in the Sustainability Appraisal) and OS3 (Option C Blue Green Infrastructure in the Sustainability Appraisal) performing particularly well. OS1 is the closest option to the strategy of urban concentration and regeneration underpinning the current Aligned Core Strategies.

These two options are therefore the main components in the Preferred Approach strategy, which focuses on ensuring development maximises opportunities to enhance the Blue and Green Infrastructure network but with a focus on promoting 'urban living' through prioritising sites for development within the main built up area of Nottingham and to a lesser extent, adjoining it. There is also a focus on maximising the development potential of key sites at Ratcliffe-on-Soar power station and Toton and Chetwynd which will benefit from future transport infrastructure improvements in the vicinity of the

sites, as OS4 the Transport-Led Growth Strategy, also has a positive sustainability appraisal.

In recognition of the potentially harmful effects of 'town cramming' of urban intensification if the urban areas are overdeveloped, this element is qualified by taking into account quality of life, and is considered to be the most appropriate strategy for the area as it will make the most of existing infrastructure, will focus development within the most sustainable location and also allows for the application of the '20 minute neighbourhood' approach. The Blue Green infrastructure emphasis is also central to the preferred approach strategy, to ensure new development makes the most of existing Blue Green infrastructure, enhances what is already present, and provides new Blue Green infrastructure to support growth.

Given the finite capacity of the main built up area to accommodate growth, the preferred approach strategy also promotes development at a lesser scale in or adjoining key settlements, which are settlements with the capacity to accommodate further growth in terms of infrastructure, facilities and transport networks.

**5. Question OS5: Climate change**

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

The Vision states that the area will be at the forefront of tackling and adapting to the impacts and challenges of climate change and that the area's carbon footprint will be minimised. The Vision also recognises the climate emergency and states the dates by which the councils will seek to be carbon neutral.

Further details regarding the policy approach will be provided as part of the Publication Version of the Strategic Plan.

**6. Question OS6: Amount of New Housing**

What, if any, factors (that can be evidenced) justify planning for more or fewer new homes than the standard methodology suggests?

Changes to the standard method which introduced the application of a 35% uplift to the City Council's housing need post-dated the consultation. However, in general developers supported the need derived from the standard method being a minimum, with a buffer added to allow flexibility, with some arguing factors such as the level of affordable housing need justified a higher figure. Some membership organisations suggested there was justification for a lower figure, largely due to environmental factors.

Nottingham City is not expected to be able to meet the entirety of its housing need within its administrative boundaries. This shortfall is projected to occur towards the end of the Plan period, as the City Council's trajectory shows need plus 35% will be met until 2035/36.

The preferred approach envisages each Borough Council meeting the entirety of their own need, with an appropriate locally determined buffer. Nottingham City will meet as much of its need plus 35% as possible. The element of the City Council's need which cannot be met within its boundaries is not redistributed to the Borough Councils.

The unmet need is not redistributed to the Boroughs because it is part of the 35% uplift, and therefore not evidenced in terms of actual local housing need, nor in terms of delivery. The National Planning Practice Guidance also references the 35% uplift and states that "This increase in the number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations." (Paragraph: 035 Reference ID: 2a-035-20201216). Whilst the National Planning Policy Framework is national policy, and includes the need to positively prepare local plans, "so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development", provision elsewhere in Greater Nottingham would entail development in the Green Belt, which the Government has made clear can only happen in exceptional circumstances. The Councils do not consider unevidenced need to constitute exceptional circumstances, and paragraph 11.b)i states that land designated as Green Belt (footnote 7) can provide "a strong reason for restricting the overall scale [...] of development in the plan area" below objectively assessed needs.

The fact that the shortfall in Nottingham City is expected to arise towards the end of the Plan period allows the opportunity for housing delivery and supply to be monitored. Current Government proposals require Local Plans to be reviewed regularly, with the next review expected to commence around 2028. Notwithstanding this, the Borough Councils' buffers allow for the full housing need of Greater Nottingham to be met.

Details of the preferred approach housing provision can be found in the Housing Background Paper.

**Area specific comments relating to Questions OS7, OS8 and OS9 are summarised after Chapter 10.**

## **7. Question OS7: Growth Options**

Which of the broad areas of search identified in the Growth Options Study do you prefer, and why?

In response to comments on the supporting evidence, it is noted that a number of parish councils and individuals commented on the accuracy of the Growth Options Study. This Study presents an initial high level analysis only and it is confirmed that a detailed site selection process based on updated

evidence where appropriate has been undertaken in order to identify allocations.

Chapter 2 of the Growth Options Study explains how the broad areas of search were identified. The Growth Options study takes a 'policy off' approach to the Green Belt in recognition that the Green Belt boundary may need to be reviewed in order to accommodate housing need. However, an updated Green Belt Review has been undertaken and forms part of the evidence base and will be used to inform the site selection process.

Whilst it is noted that Figure 2.8 of the Growth Options document does not identify any development in Nottingham City, paragraph 2.26 of the document is clear that a key issue is the capacity of the main urban area for new housing and other types of development. This informs the amount of land needed beyond the urban area.

A number of respondents support development in general areas rather than the broad locations specified and this is noted. The option of locating development in these additional locations has been considered through the site selection process.

The need to tie in with existing infrastructure and/or provide new infrastructure was emphasised and this will be addressed through the Infrastructure Delivery Plan which will inform the site selection process.

Some respondents reiterated their support for the various growth options under this question, which is noted.

## **8. Question OS8: Other Growth Strategy Options**

Do you think there are other growth strategy options which should be considered? If so, why?

Many of the comments express the view that there are no other growth options, which is noted. Others have used this question to reiterate their preferred growth option and these comments are addressed elsewhere. Many developers/landowners have used this question to promote their site for development and these comments are addressed elsewhere.

In terms of other growth options suggested:

- The provision of smaller scale but significant development at smaller "other settlements" will be considered through Part 2 local plans.
- The extension of the growth strategy to include locations on the edge of Derby city is not a matter for the Strategic Plan as it lies outside of the plan area.
- The provision of a new settlement in isolation (including on disused colliery land), rather than as part of a 'dispersed growth' option is noted and has been considered through the sustainability appraisal and site selection process.

- Options that are likely to have least impact on wildlife are the conversion of existing buildings and structures; previously developed land; smaller sites in existing built areas; re-zoning existing built up land where appropriate. These sources of supply have been taken into account in identifying the number of dwellings to be provided for on strategic sites.

**9. Question OS9: Site Assessments**

Do you prefer any of the sites at Appendix 2, and why?

Specific responses to sites are provided at the end of this document.

In terms of issues to be taken into account as part of the site selection process, the plan making process has been informed by a flood risk sequential test to justify new sites in areas of flood risk. The continuing engagement from Historic England is welcomed and consideration will be given to advice note 'The Historic Environment and Site Allocations in Local Plans' (HEAN 3). Heritage assessments form part of the site selection process. Any proposals for development will need to include sufficient information to demonstrate that any potential impacts to a SSSI have been adequately avoided or mitigated using appropriate measures and safeguards.

The impact of the development of potential sites on the Sherwood possible potential Special Protection Area (ppSPA) has been considered and Natural England's Advice Note followed.

Consideration has been given to the potential sterilization of permitted gypsum reserves in determining suitable sites for allocation, as has the potential risk of land instability due to siting of historic mining infrastructure and sterilization of potential future mining reserves (those areas not permitted but still of importance due to national scarcity and protected by Minerals Local Plans).

It is recognised that an assessment of the availability, suitability, deliverability, developability and viability of potential sites is important. A wide range of housing sites in terms of both size and market locations is important to provide suitable land for small local, medium regional and large national housebuilding companies and optimise housing delivery. It is recognised that each Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target.

**10. Question OS10: Safeguarded Land**

Should this Plan designate Safeguarded Land within the Green Belt? If so, where?

Whilst it is noted that the term 'safeguarded land' has caused some confusion with some local residents and organisations, the term and its definition is stated in the National Planning Policy Framework.

It is accepted that any amendments to the Green Belt boundary including the designation of safeguarded land must be fully justified.

Further work is suggested by those who are both for and against the designation of safeguarded land. The preparation of the Strategic Plan will include the consideration of potential development sites to assess whether they should be allocated for development or designated as safeguarded land, as well as the consideration of existing safeguarded land to assess whether it should be allocated for development or designated as Green Belt.

In response to the various suggestions for how safeguarded land should be defined, it is agreed that this should be an extension to the site allocation process and that safeguarded land is likely to include land in sustainable locations and both strategic and smaller scale sites.



## Chapter Three: Green and Blue Infrastructure and the Natural Environment

### 1. **Question GBI 1: Strategic Green and Blue Infrastructure**

Are there other areas, corridors, or individual open spaces that should be identified as Strategic Green and Blue Infrastructure?

Many stakeholders identified the importance of the Biodiversity Opportunity Maps (produced by the Nottinghamshire Biodiversity Action Group) in identifying Blue and Green Infrastructure (BGI) networks. This work has been incorporated within the Greater Nottingham Blue and Green Infrastructure Strategy (GNBGI Strategy) and provides the basis for establishing the strategic ecological networks within this strategy. The Strategy will itself identify strategic networks in the Greater Nottingham Strategic Plan and inform policies within the plan.

Specific networks of BGI were identified by consultees across the plan area, many of these are identified within the Green and Blue Infrastructure Strategy, most notably the main river valleys and canals, woodlands and ridgelines, 1845 Enclosure Act open spaces in the City, and long distance non-motorised routes.

Further details will be provided as part of the Publication Version of the Strategic Plan.

### 2. **Question GBI2: Strategic Allocations Policies**

How can proposed development enhance and protect Green and Blue Infrastructure, nature conservation assets and the wider ecological network?

It is agreed that the Greater Nottingham Strategic Plan should set the principles and framework that establish how development should contribute (both on-site and off-site) to the protection and enhancement of multifunctional BGI. Informed by the GNBGI Strategy, the plan will identify priorities within networks and opportunities from development.

The Preferred Approach: Planning Strategy and Settlement Hierarchy states that sustainable development will be achieved through ensuring development maximises opportunities to enhance the Blue and Green Infrastructure network and incorporates Blue and Green Infrastructure into new development.

Further details will be provided as part of the Publication Version of the Strategic Plan.

**3. Question GBI3: Biodiversity Net Gains**

How should we ensure new developments achieve net gains in biodiversity?

The plan will set out principles and procedures that deliver net-gains in biodiversity within sites, or adjacent to them, and/or financial contributions towards the provision of net-gains in other suitable locations.

The Vision identifies that environmental net gains will be delivered alongside developments and through the enhancement of existing and the creation of new habitats.

Further details will be provided as part of the Publication Version of the Strategic Plan.

## Chapter Four: Green Belt

### 1. **Question GB1: Principle of the Nottingham-Derby Green Belt**

Should the principle of the Nottingham-Derby Green Belt be maintained?

The general support for the principle of the retention of the Green Belt is noted. It is agreed that the Green Belt boundary should only be amended where exceptional circumstances are demonstrated. The Preferred Approach is supported by a Green Belt review which assesses broad areas against the five purposes of the Green Belt.

A number of the comments made by both developers and local residents are site specific and relate to the promotion of or objection to certain areas for development. These are addressed elsewhere within this document.

Many respondents refer to some benefits of the Green Belt which do not relate to the five purposes, such as its importance for biodiversity, flooding and the retention of prime farmland. However, the Sustainability Appraisal and site selection processes will both address these wider issues.

### 2. **Question GB2: Approach to the Green Belt**

Are there any other considerations that should direct development towards Green Belt areas rather than non-Green Belt areas (including 'Safeguarded Land')?

The majority of respondents considered that there are no other considerations that should direct development towards Green Belt rather than non-Green Belt areas. It is agreed that the Green Belt boundary should only be amended where exceptional circumstances are demonstrated.

In response to the various references to the need for any boundary changes to be clearly evidenced, the Preferred Approach is supported by a targeted Green Belt review which assesses broad areas against the five purposes of the Green Belt.

A number of the comments made by both developers and local residents are site specific and relate to the promotion of or objection to certain areas for development. These are addressed elsewhere within this document.

Suggested approaches are to prioritise brownfield sites and to prioritise safeguarded land. Both of these considerations will be taken into account as part of the site selection process along with a wide variety of other factors.

In response to the suggestion that sites should be allocated in sustainable locations in the Green Belt and new areas of Green Belt designated to compensate for the amount lost, new Green Belt designation is not feasible in those authorities where nearly all land outside of the built-up areas is already designated as Green Belt. Any potential new designations would

need to be in locations which serve the five purposes of Green Belts and there appear to be no such suitable locations.

**3. Question GB3: Offsetting losses to the Green Belt**

What improvements to environmental quality and accessibility should we consider and how could these be achieved?

The key considerations that are suggested are additional tree planting and enhanced Green Infrastructure especially through the use of native species; the creation of new walking and cycling routes, improvements to public transport, improvements to biodiversity and increased public accessibility.

Further details will be provided as part of the Publication Version of the Strategic Plan.

## Chapter Five: Working in Greater Nottingham

### 1. **Question EMP1: Employment Land and Office Space**

Do you agree that the minimum amount of employment land and office space to be provided should be based on the factors set out at paragraph 5.6?

Independent planning consultants have prepared a new employment land study: The Nottingham Core and Outer HMA Land Study 2021 (ELS 2021).

The Study a has produced a range of job forecasts based on a number of scenarios including taking into account the likely impact of the Covid 19 Pandemic. The Councils' preferred option is to base employment provision towards the upper end of the forecasts which is commensurate with their preferred option for the housing provision and the policy interventions of the D2N2 Local Enterprise Partnership. Whilst Covid restrictions have now been lifted and national output returned to pre pandemic levels there is still a need to stimulate a full recovery from the negative impact of the pandemic and to counter the threat of a likely economic downturn due to rapidly rising energy prices affecting the UK economy nationally anticipated during the early years of the plan period.

### 2. **Question EMP2: Office Development**

Should we focus office development in Nottingham City Centre or should it be at other accessible locations such as around the HS2 Hub Station or at Sustainable Urban Extensions?

The Councils agree that the City Centre should be the main focus for new office floorspace. In this context, it is acknowledged that there is a lack of good quality office floorspace in the City Centre. A solution to this is to provide better quality office accommodation whilst managing the release of poorer quality stock for reuse or redevelopment including residential.

In response to comments making comparisons with other UK Cities, Nottingham City Centre is of regional significance, and policies in the GNSP will reflect its important role and function in allocating and distributing office space.

Since the consultation, the Government has confirmed that the eastern leg of HS2 will run from Birmingham to the East Midlands stopping at East Midlands Parkway and will connect to the Midland Main Line which is to be improved with rail services to Nottingham and intermediate stations. The Government has also designated the East Midlands Freeport as one of eight new Freeports in England. The Ratcliffe on Soar Power Station Site is due to be decommissioned in 2024 and located close to East Midlands Parkway, situated within the Freeport. This site represents a redevelopment opportunity for major employment growth. Strategic allocations for housing and employment at Toton are included in the Broxtowe Local Plan. Toton is

considered an attractive and sustainable location for homes and jobs and where active consideration is being given to the potential for a new intermediate rail station.

The Councils agree that there should be strategic mixed use allocations at Toton and major employment growth at Ratcliffe on Soar Power Station site which is a strategic redevelopment opportunity. This approach would support the aspirations of the East Midlands Development Corporation which includes proposals for an innovation centre at Toton amongst other development proposals and major employment at Ratcliffe on Soar power station including high technology, research and development sectors.

Further details will be provided as part of the Publication Version of the Strategic Plan.

### **3. Question EMP3: Driving Innovation and Supporting Business Growth**

How can we drive innovation and encourage start-up companies, including expanding the role of the universities in the area's economy?

The GNSP will include a policy that will provide for a wide range of employment premises to meet the needs of all employment sectors. This will include start up premises, grow on space and specific provision to support innovation and spin out companies in appropriate locations such as the university and hospital campuses.

Further details will be provided as part of the Publication Version of the Strategic Plan.

### **4. Question EMP4: Regeneration Priorities**

What should the key regeneration priorities be, and where?

The strategy focuses on urban concentration with regeneration. This means concentrating as much development within the urban area as practical. The strategy also continues to focus development, services and facilities within existing town and rural centres.

Strategic sites will be identified within areas in need of regeneration and in locations that support regeneration objectives, such as providing employment in accessible locations. The GNSP is also a framework for coordinating and guiding the locational decisions and actions of other agencies with responsibility for economic development, regeneration, training and education.

Further details will be provided as part of the Publication Version of the Strategic Plan.

**5. Question EMP5: Climate Change**

How can we encourage businesses to address Climate Change and mitigate their environment impacts?

All of the partner Councils have declared climate emergencies and have ambitious targets for achieving zero carbon. All Councils are drawing up policies and projects to tackle the causes of climate change, to mitigate its impacts and adapt to climate change, which is most effectively pursued in partnership.

These action plans and initiatives will complement the GNSP which has an important role particularly in achieving more sustainable patterns of development by locating development in accessible locations that encourage walking, cycling and public transport reducing the reliance on the private car and decreasing carbon emissions.

The Councils agree that policy for new build, redevelopment and refurbishment of employment premises should meet a high standard for achieving low carbon development and intend to set standards for non-residential buildings in policy.

The Councils will include a policy in the GNSP requiring relevant infrastructure to support new development and seek developer contributions to provide this infrastructure, which may include electric vehicle charging points to support new development.

With respect to flood risk, the GNSP will include a policy in order to manage flood risk. This will seek to steer development to lower risk locations.

Further details will be provided as part of the Publication Version of the Strategic Plan.

**6. Question EMP6: Safeguarding Employment Land**

Should we continue to safeguard good quality employment sites and release sites of lesser quality, unless they contribute to regeneration?

The Councils share the broad consensus about the need to safeguard good quality sites or sites that support employment in deprived areas. The Councils also accept the need for flexibility to make good use of the land resource through the managed release of employment sites that are no longer needed to support employment. ELS has assessed the quality of key employment sites and its findings indicate the vast majority of these are good or average quality and should be retained. The Councils will assess non-strategic employment sites using the same criteria as ELS in due course. A policy that seeks to safeguard the better quality and more accessible employment sites and those which are important sources of local employment would be included in the Plan. Lower quality sites for which there is no longer demand would be released for alternative uses including residential.

Further details will be provided as part of the Publication Version of the Strategic Plan.

**7. Question EMP7: Rural Area**

How can we support rural diversification?

It is agreed rural diversification should be an important aim. Policies will be included to support rural diversifications schemes, appropriate tourism, and visitor facilities. Green Belt policy as set out in the NPPF permits the reuse of rural buildings provided they do not harm openness. The Councils would particularly like to encourage the reuse of rural buildings for appropriate employment purposes.

The protection of countryside and the need to safeguard high quality agricultural land is a common issue raised by a number of respondents. Most of the rural area outside of the built up area of Greater Nottingham is in Green Belt and development will continue to be restricted in line with Green Belt Policy as set out in the National Planning Policy Framework and in Green Belt policies in the GNSP and Part 2 Local Plans. The Green Belt does not entirely cover the rural area of Rushcliffe Borough however, policies in the Part 2 Local Plan will continue to protect the countryside from inappropriate development.

Further details will be provided as part of the Publication Version of the Strategic Plan.



## Chapter Six: Living in Greater Nottingham

### 1. **Question H1 Affordable Housing**

What approach should we take to affordable housing?

The Vision identifies that people from all sections of society will be provided with better access to homes. Any infrastructure requirements, together with affordable housing requirements contained within the plan, including any breakdown in affordable housing tenure will be subject to viability testing in line with the National Planning Policy Framework and Planning Practice Guidance.

Further details will be provided as part of the Publication Version of the Strategic Plan.

### 2. **Question H2 Housing Size, Types and Tenure**

What should our role be in influencing the mix of housing size, types and tenure in new development schemes?

The GNSP will contain principles in relation to the mix of both market and affordable housing that will be expected on sites and will have regard to the evidence contained within the Greater Nottingham and Ashfield Housing Needs Study, as well as national policy and guidance and any more detailed local level assessments. A First Homes Assessment has also been produced to provide further guidance regarding the approach to First Homes.

Further details will be provided as part of the Publication Version of the Strategic Plan.

### 3. **Question H3: Meeting the Needs of Different Groups**

How should we address the needs of people with particular housing needs for example, the elderly, disabled and students?

In relation to purpose built university accommodation it is acknowledged that such accommodation can make an important contribution to housing supply both through its provision and through freeing up existing properties for use by families.

In relation to wheelchair accessibility standards, all Part 2 Local Plans contain policies requiring wheelchair accessibility standards or wheelchair adaptability standards. For the Strategic Plan, any plan wide viability assessments will assume that residential development will be at least M42 standard. It will be for the review of respective Part 2 Local Plans to consider whether a wheelchair adaptable policy is appropriate.

In relation to specialist housing, the Councils will consider whether the Strategic Plan is the best place to contain policies in relation to such provision. Consideration will be given as to how to best accommodate the need for downsizing properties and bungalows as part of the Strategic Plan.

Further details will be provided as part of the Publication Version of the Strategic Plan.

**4. Question H4: Gypsies and Travellers**

What approach should we take to accommodating the housing and travel needs of Gypsies, Travellers and Travelling Showpeople?

In terms of need, the Councils commissioned a Gypsy and Traveller Accommodation Assessment. The findings of this study will be considered when formulating any policy in relation to Gypsies, Travellers and Travelling Showpeople.

Further details will be provided as part of the Publication Version of the Strategic Plan.

## Chapter Seven: The City and Town Centres

### 1. **Question CTC1: The Network and Hierarchy of Centres**

Do you think the network and hierarchy of centres set out within Figure 7.1 remains appropriate?

A Town Centres study will be commissioned to provide detailed advice on the future role, needs and characteristics of retail provision.

It should be noted that the retail hierarchy is not the same as the settlement hierarchy.

Further details will be provided as part of the Publication Version of the Strategic Plan.

### 2. **Question CTC2: Nottingham City Centre and the Town and District Centres**

How can we help our City, Town and District Centres to adapt to changing shopping habits and other behavioural changes?

A Town Centres study will be commissioned to provide detailed advice on the future role, needs and characteristics of retail provision. The GNSP will recognise that centres are not just for retail but serve many purposes including culture, housing, leisure, office etc. The plan will therefore create a flexible policy framework for centres.

Further details will be provided as part of the Publication Version of the Strategic Plan.

### 3. **Question CTC3: Acceptable uses on the edge or outside of centres**

Should local impact thresholds be set to protect retail centres? If so, what should these thresholds be and why?

A Town Centres study will be commissioned to provide detailed advice on the future role, needs and characteristics of retail provision.

Further details will be provided as part of the Publication Version of the Strategic Plan.

## Chapter Eight: Designing Good Places

1. **Question D1: Achieving Well Designed Places**

Should we promote the use of consistent design principles or standards across the Plan area? If so, what design tools should be used?

Achieving high quality design forms a key part of the Vision. Further details regarding the approach to design, including the approach to design codes, and a design specific policy will be included in the Publication Version of the Strategic Plan.

2. **Question D2: Conserving and Enhancing the Historic Environment**

How can the Plan provide a positive strategy for the conservation and enjoyment of the historic environment?

Making the most of heritage assets and preserving the area's natural environment and heritage are included within the Vision. Conservation and the historic environment have also been considered as part of the site selection process. Further details regarding the approach to conservation and the historic environment will be included in the Publication Version of the Strategic Plan.

## Chapter Nine: Infrastructure to Support Growth

### 1. **Question IN1: Infrastructure to Support Growth**

Are there any barriers to future housing or economic development in terms of necessary infrastructure provision, and if so what are they?

The Councils will be considering infrastructure constraints as part of preparing the GNSP and liaising with infrastructure providers to ensure that further evidence is obtained where necessary. The intention is that the strategic policies and future development are informed by evidence of infrastructure requirements and opportunities. This includes undertaking detailed transport modelling.

Further details will be provided as part of the Publication Version of the Strategic Plan.

### 2. **Question IN2: Priorities for Development-Funded Infrastructure**

Are there any priorities for development-funded infrastructure that we should set out?

The Councils recognise the importance of infrastructure within new developments and that the best approach is to coordinate infrastructure. The Infrastructure Delivery Plan (IDP) will be developed with service providers and developers to ensure adequate provision of infrastructure.

The importance of providing adequate education and healthcare facilities as well as sufficient sustainable transport (cycleways, public transport) is recognised. As the IDP develops, the current capacity of infrastructure and the cumulative effects will be considered to help understand where and what infrastructure is needed to support developments and ensure these are good places to live and work.

Further details will be provided as part of the Publication Version of the Strategic Plan.

### 3. **Question IN3: Timely Provision of Infrastructure**

How can we ensure the timely provision of necessary infrastructure?

The IDP will be developed with key stakeholders, including developers, utilities providers and Local Planning Authorities to understand the timeframe of proposed developments and so what infrastructure is required and when. This will enable a coordinated plan to be delivered.

Funding for infrastructure and funding opportunities will be considered within the IDP to enable transparency and detail how funding will be sourced and secured. A viability assessment will also be undertaken alongside the plan.

Whilst many expressed a preference for infrastructure to be completed before delivery of housing or employment sites, when the infrastructure is needed will depend on the existing infrastructure capacity and the cumulative impact of development.

Further details will be provided as part of the Publication Version of the Strategic Plan.

## Chapter Ten: Any Other Issues, Commenting on this Document and Next Steps

### 1. **Question OI1: Any other issues**

Are there other issues you wish to raise, if so what are they, and what topic do they come under?

A number of issues raised matters relating to the Strategy or to sites and these have been considered in the relevant sections.

In response to the Environment Agency's request to incorporate a local version of flood risk standing advice (LFRSA), the LFRSA will be appropriately referenced and mentioned in policy in the Strategic Plan

The Greater Nottingham Strategic Plan will have regard to a wider area than just that covered by the plan, including the need to take full account of the potential cumulative impact upon the wider area.

The following sections contain summaries relating to specific areas or sites. The majority of comments were submitted in response to questions within Chapter 2: Overall Strategy or Chapter 10: Any Other Issues.

## Area Specific Comments: Broxtowe

1. **B01 Brinsley Extension**
2. **B02 Eastwood Extension**
3. **B03 Northwest of Bulwell**
4. **B04 Watnall Extension**
5. **B05 Nuthall Extension**
6. **B06 Awsworth Extension**
7. **B07 North of Trowell**
8. **B08 Land off Woodhouse Way**
9. **B09 Northeast of Toton**

The proposed approach to housing provision and distribution within Broxtowe is outlined in the Preferred Approach document and Housing Background Paper. It is proposed that strategic sites at Field Farm, Stapleford; Boots; Toton Strategic Location for Growth; and Land at Chetwynd Barracks should be carried forward as part of the GNSP. These sites are existing allocations either within the Aligned Core Strategy or within the Broxtowe 2 Part Local Plan. Due to these allocations, there is no requirement for the allocation of any new strategic housing sites within the broad locations B01 to B09.

In respect of employment land provision within Broxtowe, it is proposed that there will be a significant level of employment at the Toton Strategic Location for Growth which would support the aspirations of the East Midlands Development Corporation. Further justification for the site's allocation is outlined in the Preferred Approach document and Employment Background Paper. There is not, however, justification for any further new strategic employment sites within the broad locations B01 to B09. Notwithstanding this, the Councils have recently undertaken a "call" for strategic distribution sites and the approach to large strategic distribution development will be addressed at the next stage of plan preparation.



## Area Specific Comments: Gedling

### 1. G01 Ravenshead Extension

#### G01.1 Silverland Farm, Ricket Lane Site A

The site is close to but does not adjoin Ravenshead and does not accord with the planning strategy and settlement hierarchy. The site is not considered to be strategic in scale.

#### G01.2 Silverland Farm, Ricket Lane Site B

The site adjoins Ravenshead. There is a low landscape visual value, but a high level of susceptibility due to the site forming a key part of the landscape context to Ravenshead. Potentially extending development towards and onto the ridgeline would encroach on the rural setting of the Fountain Dale moat Scheduled Monument. In relation to both impacts on the heritage asset and sensitivity of the landscape a substantial landscape buffer across the high ground in the northern section of the site would be required. Consequently, the capacity of the site is reduced to a level which is not considered to be strategic in scale.

The site is not being considered for allocation as a strategic site.

#### G01: New Sites promoted by developers/owners

##### West of Kighill Farm

The site adjoins the key settlement of Ravenshead. The site is not considered to be strategic in scale.

##### Land at Cornwater

The site adjoins the key settlement of Ravenshead. The site is not considered to be strategic in scale.

### 2. G02 Newstead Extension

No site specific comments received.

### 3. G03 North of Hucknall

#### G03.1 Top Wighay Farm east and G03.2 Top Wighay Farm north

Note Top Wighay east and north have been combined and are assessed as a single site in the site selection document.

The site adjoins the existing allocation adjoining the sub regional centre of Hucknall. There are no major constraints. A landscape buffer would be required along the eastern and south-eastern boundaries of the site in order to mitigate the potential impact on the rural setting of the Linby Conservation Area. Account will need to be taken of the potential impact of the extension to the allocation on the Local Wildlife Site within the site.

The site is being considered for allocation as a strategic site.

## **New Site G03 New Site promoted by developers/owners**

### **Hayden Lane**

Adjoins the Hucknall sub-regional centre. The Heritage Assessment concludes development here would severely impact the rural character, appearance and setting of Linby village and conservation area leading to con-joining of Hucknall to Linby.

The site is not being considered for allocation as a strategic site.

## **4. G04 North of Burntstump Hill**

### **G04.1 North of Burntstump Hill, Mansfield Road**

The site does not adjoin the urban area, edge of Hucknall or a key settlement and does not accord with the planning strategy and development hierarchy. The site is too remote and isolated.

The site is not being considered for allocation as a strategic site.

## **5. G05 Bestwood Village / Redhill Extension(s)**

### **G05.1 Land to west of the A60 Redhill and G05.2 Land to north of Bestwood Lodge Drive**

Note Land to the west of A60, Redhill and Land north of Bestwood Lodge Drive merged for site selection exercise.

The site adjoins the main urban area. 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 route/s through the development site.

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. The impact upon Bestwood Lakeside (former Pumping Station) would be significant and result in harm to the setting of the grade II\* Listed Building and grade II Registered Park and Garden.

The site is not being considered for allocation as a strategic site.

### **G05.3 Land at Westhouse Farm, Bestwood Village**

The site comprises existing safeguarded land adjoining an existing allocation adjoining the key settlement of Bestwood Village. The site is not considered to be strategic in scale.

### **G05.4 Broad Valley Farm, Park Road**

The site adjoins the key settlement of Bestwood Village. The development of the site would be likely to have a high level impact from the southern edge of the site on the setting and views of the Listed Building and Scheduled Ancient Monument – Winding House and headstocks to former Bestwood Colliery. The site is not being considered for allocation as a strategic site.

## 6. **G06 Calverton Extension**

### **G06.1 Land off Oxton Road**

The site adjoins an existing allocation adjoining the key settlement of Calverton. Development of the site would encroach upon the rural and open landscape 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.

The site is not being considered for allocation as a strategic site.

### **G06.2 Ramsdale Park Golf Centre Site A and G06.3 Ramsdale Golf Centre Site B**

Note: G06.2 - Ramsdale Park Golf Centre Site A, G06.3 - Ramsdale Park Golf Centre Site B and G06 – New Site Main Street and Georges Lane have been merged for the site selection exercise.

The site adjoins the key settlement of Calverton. The development of the site would result in a major impact on the Listed Building (Hollinwood House) and its setting, and Calverton Conservation Area. The north eastern part of the site is on the edge of the village and visually a parcel of farmland that encloses the settlement. There would be a direct impact on the rural approach to the conservation area.

Landscape constraints would rule out much of the more elevated parts of the site. Consequently, the capacity of the site is reduced to a level which is not considered to be strategic in scale.

The site is not being considered for allocation as a strategic site.

### **G06: New Sites promoted by developers/owners**

#### **Land to the west of Calverton between Main Street and Georges Lane**

This site is responded to above.

## 7. **G07 Arnold Extension**

### **G07.1 Land at Stockings Farm, Redhill**

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.

The site is not being considered for allocation as a strategic site.

### **G07.2 Land at Middlebeck Farm, Mapperley**

The site adjoins the main urban area to the east, although is separated from the urban area to the south. Development is likely to impact on the landscape character area of the Lambley Dumble and encroach into views of the Dumbles from

Mapperley Plains. However, southern parts of the site may be more acceptable in landscape terms.

Consequently, the capacity of the site would be reduced to a level which is not considered to be strategic in scale.

The site is not being considered for allocation as a strategic site.

**G07: New Site promoted by developers/owners**

**Middlebeck Farm extension land to the south of site G07.2 at Middlebeck Farm**

This site is responded to above.

8. **G08 Woodborough Extension**

**G08.1 Land North of Bank Hill, Woodborough Extension**

The site does not adjoin a key settlement and does not accord with the planning strategy and development hierarchy.

The site would form a large incongruous extension to a small village which would be likely to have a major negative impact on the setting of the Woodborough Conservation Area.

The site is not being considered as a strategic site for allocation.

9. **G09 Carlton Extension**

**G09.1 Land off Lambley Lane**

Adjoins an existing allocation on the edge of the urban area. The site is not considered to be strategic in scale.

**G09: New Site promoted by developers/owners**

**Land at Gedling Wood Farm adjoins G09.1 above.**

This site is responded to above.

10. **G10 Burton Joyce Extension**

**G010: New Sites promoted by developers/owners**

**North of Orchard Close, Burton Joyce**

The site adjoins the village of Burton Joyce. The site is not considered to be strategic in scale.

**G10.1 Colwick Loop Road**

The site adjoins the village of Burton Joyce. Development of the site would lead to coalescence in a sensitive part of the Green Belt between the Nottingham Urban area and the village of Burton Joyce.

The site is not being considered as a strategic site for allocation.

### **G11.1 Land to East of Teal Close**

The site adjoins an existing strategic allocation on the edge of the main urban area. The development of the eastern part of the site would be in Flood Zone 2 and would need to be developed in accordance with advice from the Environment Agency. Account would also need to be taken of the potential impact on the adjoining ecology park and nearby Local Nature Reserve.

The site was considered for allocation as a strategic site but is not taken forward as a result of the ministerial statement published on 6 December 2022 and to be made clear in an updated National Planning Policy Framework as it would require the release of Green Belt.

## **Area Specific Comments: Nottingham City**

### **1. B08.5 Extension to Woodhouse Park**

The site is considered to be too small to be considered as part of the GNSP. The site will be considered as part of the preparation of the part 2 Local Plan.

## Area Specific Comments: Rushcliffe

1. **R01 East Bridgford**
2. **R02 RAF Newton**
3. **R03 Bingham extension**
4. **R04 Aslockton Extension**
5. **R05 South of Orston**
6. **R06 Radcliffe on Trent Extension**
7. **R07 Gamston**
8. **R08 Cotgrave**
9. **R09 Langar Airfield**
10. **R10 West of Sharphill Wood**
11. **R11 West of Tollerton**
12. **R12 Ruddington Extension**
13. **R13 West Keyworth**
14. **R14 Stanton on the Wolds**
15. **R15 A453 Corridor**
16. **R16 East Leake Extension**
17. **R17 North of Loughborough**

### Other locations within Rushcliffe

- **Leake Road, Costock**
- **West of Cropwell Bishop**
- **North of Memorial Hall, Cropwell Bishop**
- **Land east of Gypsum Way, Gotham**
- **Sutton Bonington**
- **Kinoulton**
- **Whatton in the Vale**

The proposed approach to housing provision and distribution within Rushcliffe is outlined in the Preferred Approach document 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 within the broad locations R01 to R14 or other locations listed above.

In respect of employment land provision within Rushcliffe, it is proposed to carry forward all those strategic employment sites allocated by the existing Rushcliffe Local Plan (which form part of mixed use allocations). In addition, major new employment growth is proposed at the Ratcliffe on Soar Power Station site (within the R15 broad area) which is a strategic redevelopment opportunity. The site's allocation would support the aspirations of the East Midlands Development Corporation and East Midlands Freeport. Further justification for the site's allocation is outlined in the Preferred Approach document and Employment Background Paper. There is not, however, justification for any further new strategic employment sites within the broad locations R01 to R14 or the other locations listed above.

Notwithstanding this, the Councils have recently undertaken a “call” for strategic distribution sites and the approach to large strategic distribution development will be addressed at the next stage of plan preparation.