

# Greater Nottingham Strategic Plan



## Site Selection Report September 2024

Greater Nottingham  
Planning Partnership



## **Contents**

1.0	Introduction.....	2
2.0	Reasonable Alternatives.....	4
3.0	Approach.....	6
4.0	Decision Making.....	13
5.0	Recommendations .....	14
6.0	Next Steps.....	15
	Plan of Reasonable Alternative Housing/Mixed Use Strategic and Employment Sites across the Plan Area .....	16

## 1.0 Introduction

- 1.1 Following the adoption of the Aligned Core Strategies for Broxtowe, Gedling and Nottingham City Councils in September 2014 and Rushcliffe Core Strategy in December 2014 the partner councils have been working together on the review, the Greater Nottingham Strategic Plan. One of the key tasks that the Strategic Plan will perform is to identify and allocate new strategic sites for development as well as to confirm those existing sites with planning permission that have yet to be fully implemented to ensure they continue to deliver in future. The Strategic Plan sets out a planning strategy for meeting the housing and employment needs, based on a defined settlement hierarchy. The Strategic Plan and the Housing and Employment Background Papers provide details of the current housing and employment supply and identifies strategic site allocations. Site specific details of the sites are also included, with key development requirements.
- 1.2 The Strategic Plan is supported by a range of evidence which this site selection document takes into account. This includes a Plan Wide Viability Assessment and an Infrastructure Delivery Plan. A detailed transport assessment is also being prepared.
- 1.3 The preparation of the Strategic Plan has been subject to public consultation. Firstly, the Growth Options consultation between July 2020 and February 2021. Secondly the Preferred Approach consultation between January and February 2023 and thirdly a Strategic Distribution and Logistics Preferred Approach consultation between September 2023 and November 2023. Responses to these consultations have helped shape the current version of the Strategic Plan and have informed the site selection process.
- 1.4 The Preferred Approach consultation which focussed on strategic housing/mixed use and general employment sites was accompanied by a Preferred Approach Site Selection Report which has been refreshed and updated to form this current document – the Publication Draft Site Selection Report. For the Preferred Approach to strategic distribution sites the site selection process was set out in the Strategic Distribution Background Paper (November 2023). This current Site Selection Report draws together the site selection process for all strategic sites including strategic distribution sites into one document. Part A of this Site Selection Report sets out the process for selecting strategic housing/mixed use sites and general employment sites. Part B covers the approach to selecting strategic distribution sites which, because of their very specific operational and locational criteria, is presented separately. The appendices for each authority contain all strategic sites.

### **Part A: Strategic Sites: Housing/mixed Uses and General Employment**

- 1.5 A number of sites have been identified as being 'Reasonable Alternatives'. These are sites which are located within or adjacent to existing built up areas of Nottingham, adjacent to the sub-regional centre of Hucknall and key settlements

and are potentially suitable for residential and employment development. In order to assess which of these sites will be allocated for development consideration needs to be given to a wide range of factors including amongst others:-

- Landscape and visual impact;
- Historic environment;
- Green Belt;
- Flooding;
- Biodiversity; and
- Infrastructure.

- 1.6 In order to ensure that decisions about which of the Reasonable Alternative sites will be allocated are made in a transparent and objective way, a process of assembling relevant information and then considering this information in a consistent manner has been undertaken. A two stage process has been used to determine firstly whether the site could be allocated and secondly recommendations made as to whether the site should be allocated in preference to other Reasonable Alternatives so that the housing need requirement is met.
- 1.7 This Publication Draft Site Selection Report has been prepared in tandem with the Background Papers on Housing and Employment and other key background evidence documents. The site selection process has helped identify the scale of development that can be accommodated in and adjacent to the main built up areas of Nottingham and adjacent to the sub regional centre of Hucknall and key settlements. The assessments have helped inform which of the sites are recommended for allocation.
- 1.6 The document is structured into two parts; a Report and a series of appendices. The Main Report sets out the approach that has been taken and summarises the outcome of the site selection process for Greater Nottingham. The appendices provide the detail of the site selection process for each partner council area:-
- Appendix A – Broxtowe Borough Council;
  - Appendix B – Gedling Borough Council;
  - Appendix C – Nottingham City Council; and
  - Appendix D – Rushcliffe Borough Council.

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

## 2.0 Reasonable Alternatives

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

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

	permission may need to be allocated to ensure that their ability to deliver houses and employment in the future is appropriately protected.
<b>2023 SHLAA Assessment</b>	<p>Sites which have been assessed as deliverable or developable or could be suitable if policy changes are included.</p> <p>Sites which have been assessed as not deliverable or developable may be included where their constraints are deemed to be such that further work may overcome them or if there is the potential that the benefits of developing the site may outweigh the impact of the constraint.</p>

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

## 3.0 Approach

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

### Sources of Information

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

Information	Reason	Source
Site name and reference	Unique and consistent name and reference number to ensure that there is clarity about which site is being discussed.	
Number of dwellings estimated employment land or floorspace	To identify the level of housing and / or employment development that is being initially considered on site.	SHLAA Review 2023 <a href="#">Employment Land Study (Lichfields 2021)</a> In house Employment Land Supply information.
Existing Use	The current use of the site is recorded.	SHLAA Review 2023
Known Land Contamination	Whether there is known or likely ground contamination resulting as a consequence of previous use for e.g. former industrial land.	SHLAA Review 2023
PDL or Greenfield	The NPPF requires that the re-use of previously developed land is encouraged. In making decisions preference will be given to sites which are previously developed or contain a proportion of previously developed land.	SHLAA Review 2023

SHLAA Conclusion	The SHLAA identifies constraints to the development of the site and provides contextual information about the site such as whether it is already allocated for development or has extant planning permission.	SHLAA Review 2023
Growth Options Study conclusion	The Growth Options Study (AECOM July 2020) was commissioned to inform the Greater Nottingham Strategic Plan. This included reviewing and assessing the sustainability of settlements, the growth potential of broad locations, transport corridors, sustainable urban extensions, key settlements and stand-alone sites. The findings of the study are therefore relevant to site selection.	<a href="#">The Growth Options Study (AECOM July 2020)</a>
Compliance with the GNSP Preferred Approach	Sites will be assessed for compliance with the proposed Planning Strategy in the Publication Draft Strategic Plan and in particular the settlement hierarchy.	GNSP Publication Draft Planning Strategy
Plan Wide Viability	The viability of the site has been considered through the preparation of the Plan Wide Viability assessment in support of the Publication version of the Greater Nottingham Strategic Plan.	Plan Wide Viability Assessment
Infrastructure including: Utilities Emergency Services Education Health Blue and Green Infrastructure Community Facilities Other services (if identified)	Impact on infrastructure is an important part of making decisions. Information from the Growth Options Study will be presented on a range of types of infrastructure. Responses from infrastructure providers as part of the Consultation on the Preferred Approach have also informed an Infrastructure Delivery Plan (IDP) published in support of the Publication Draft Strategic Plan.	<a href="#">The Growth Options Study (AECOM July 2020)</a>  Infrastructure Delivery Plan
Sustainability Appraisal (SA)	The SA assesses sites against a range of different factors and	Publication Draft: Sustainability Appraisal



	scores them for their sustainability.	
Green Belt	The protection of the Green Belt is an important factor and changes to Green Belt boundaries require 'exceptional circumstances'.	Green Belt Review,
Carbon Neutrality	Sites have been categorised according to the likelihood of a location to reduce the need to travel or travel more sustainably and hence potential to reduce carbon emissions in the following order:- Within and adjoining the Main Urban Area; Edge of Hucknall; Adjoining a Key Settlement.	Further work would be undertaken at the planning application stage including full environmental analysis and application of low carbon and design planning policies.
Impact on Air Quality	Whether the site is within or near an Air Quality Management Area.	SHLAA Review 2023 with reference to the scientific officer.
Transport / Accessibility	Ensuring that sites have suitable and safe access to the road network and will not affect its operation is an important part of determining whether sites can be allocated.  Detailed traffic modelling of sites allocated in the Publication Draft GNSP to assess the cumulative impact of travel on the highway network.  Information is also provided on accessibility to community facilities by walking, cycling and public transport within 30 minutes total travel time. Information on whether community facilities are within 400 m walking distance from the edge of the site is also recorded.  This provides an indication of the sustainability of the location in accessibility terms.	Transport - in house assessment with input from County Highways.  Transport Assessment  Accessibility to services and facilities - in house assessment.
Flood Risk	The NPPF seeks to steer development away from areas at	SHLAA Review 2023

	high risk of flooding from all sources.	
Natural Environment	The NPPF requires that designated sites of nature conservation interest should be protected in line with their importance. The presence of sites of designated nature conservation interest within or in the vicinity of the site is considered important.	SHLAA Review 2023
Historic Environment	The protection and enhancement of designated and non-designated heritage assets such as Listed Buildings and Conservation Areas is a requirement of the law.	Publication Draft: Heritage Assets Assessment
Landscape and topography	The impact of development sites in terms of the potential impact on the landscape and visual amenity is summarised for each site and includes a score.	For all - Greater Nottingham Growth Options Study and additional Landscape Assessment Work  For GBC only - Landscape and Visual Analysis of Potential Development Sites (AECOM 2022)
Consultation Responses	It is important that the views of local people are taken into account when preparing the Greater Nottingham Strategic Plan. Responses made during previous consultations may provide additional relevant evidence for a certain site or broad area.	Greater Nottingham Planning Partnership Report of Consultation Responses: Growth Options (February 2022)  Preferred Approach: Response to the Growth Options Consultation, December 2022

### *SHLAA Review 2023*

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

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

Infrastructure and the *Infrastructure Delivery Plan*

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

*GNSP Sustainability Appraisal*

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

*Preferred Approach: Green Belt Background Paper and Review*

- 3.10 The Green Belt Review assesses how well areas of land are performing against the purposes of the Green Belt and updates previous assessments taking into account any changes such as development and allocations through adopted Part 2 Local Plans or revised Conservation Area boundaries. The Publication Draft Green Belt Review has assessed areas against four of the purposes of the Green Belt. These are:-
- To check the unrestricted sprawl of large built-up areas;

- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment; and
- To preserve the setting and special character of historic towns.

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

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

#### *Local Transport Authority*

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

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

#### *Preferred Approach: Heritage Assets Assessment*

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

#### *Consultation Responses*

3.16 Consultation on the GNSP has involved a number of different stages and methods. The first stage was a Growth Options consultation which took place in summer 2020 with an extension consultation early in 2021. The second stage was a Preferred Approach consultation which took place between January and February 2023 and the third stage was a Strategic Distribution and Logistics Preferred Approach consultation which took place between September 2023 and November 2023. Responses to these consultations have helped shape the

current version of the Strategic Plan and have informed the site selection process.

#### Site Schedules

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

- *Location Map* – a map showing the location of the site in the terms of the settlement which it would, if allocated, form part of; and
- *Aerial Photograph* – a photograph of the site taken from above showing the existing buildings, vegetation, areas of hard standing and other features.

## 4.0 Decision Making

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

## 5.0 Recommendations

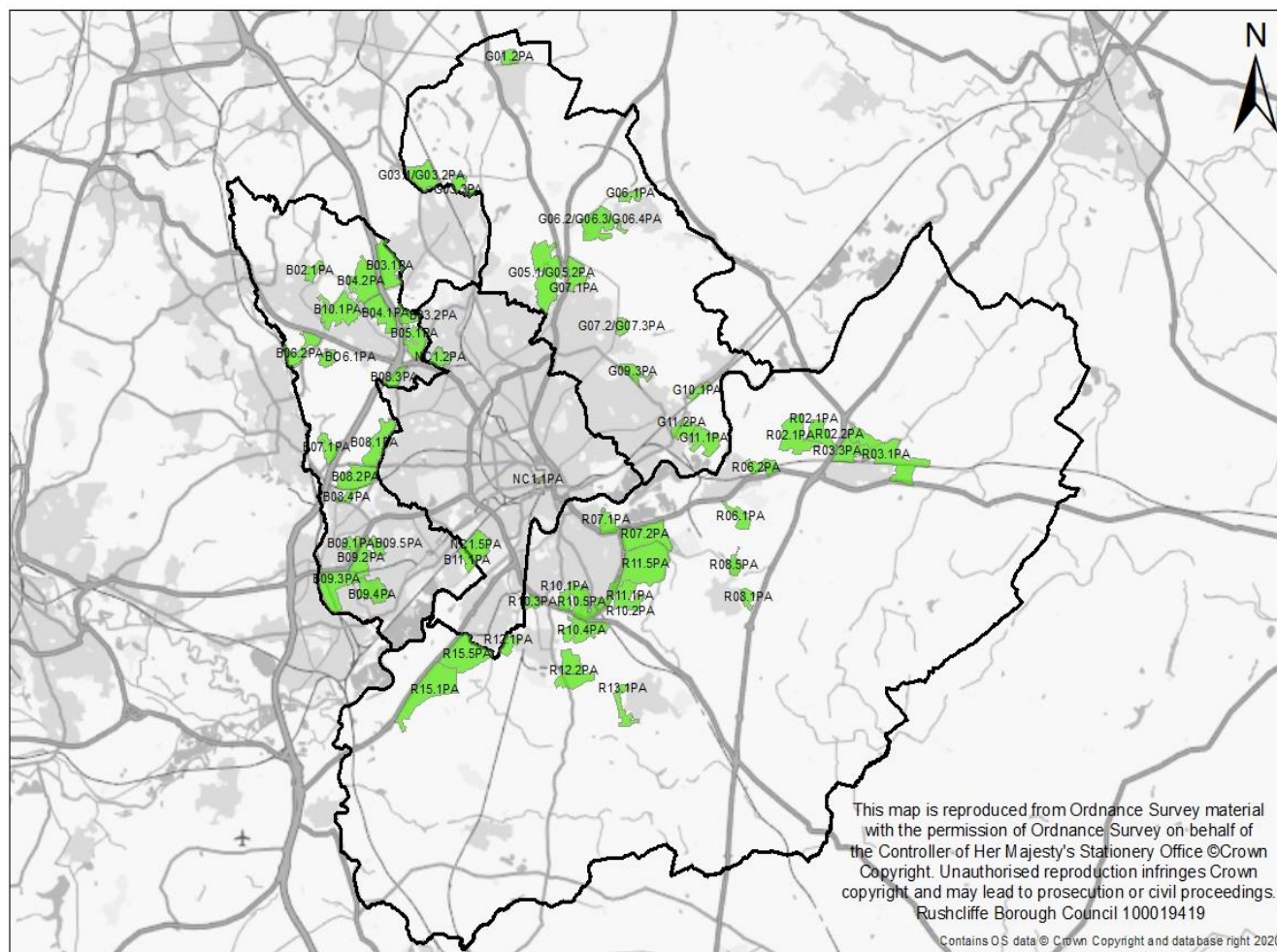
- 5.1 Across the Plan Area, 68 sites were originally identified through the Sustainability Appraisal process as green 'Reasonable Alternative' sites which required consideration as to whether to include them in the Preferred Approach, and these are shown on the plan provided at the end of Section 6.0. The appendices for each Council include the assessments for each site and conclude whether they could be allocated and whether they should be allocated. In addition, a number of sites with extant planning permission are being recommended for allocation. This is to protect the permitted use of the site in case the planning permission were to lapse.
- 5.2 An additional strategic site employment site is being recommended for allocation at the Ratcliffe on Soar Power Station within Rushcliffe Borough.
- 5.3 The Former Bennerley Coal Disposal Point in Broxtowe is being recommended for allocation for logistics but this is covered in further detail below in Part B. There is also an extension to the existing Toton Strategic Location for Growth allocation to facilitate key transport infrastructure. The site has also now been combined with the Chetwynd Barracks site.
- 5.4 Two additional sites, one within Gedling Borough (this comprises the extension of an existing strategic allocation) and one within Nottingham City, are being recommended for allocation for housing, as follows:-
- G03.1/G03.2PA: Top Wighay Farm – an additional 710 homes on existing safeguarded land.
  - NC1.1PA: Broad Marsh – a new site at Broad Marsh based around the former shopping centre is also included as a location for around 1,000 homes representing significant residential development. As well as the demolished shopping centre, it includes the adjoining former college site on Maid Marian Way, currently allocated for a more modest 50-100 dwellings in Nottingham's part 2 local plan.
- 5.3 These sites have been used to prepare the Publication Draft Housing Background Paper which sets out how homes will be delivered in the Plan Area.

## **6.0 Next Steps**

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



## Plan of Reasonable Alternative Housing/Mixed Use Strategic and Employment Sites across the Plan Area



## **Part B Strategic Distribution Site Selection**

### **Reasonable Alternatives**

- 7.1 The site selection process for strategic distribution is based on the work undertaken for the Preferred Approach to Strategic Distribution Sites as set out in the Strategic Distribution Background Paper September 2023 which was prepared by the Greater Nottingham Councils including Ashfield District and Erewash Borough Councils. The Preferred Approach to strategic distribution was consulted on between 26<sup>th</sup> September and 9<sup>th</sup> November 2023. During this consultation a number of comments were received and these are summarised and responded to in the Strategic Distribution Report of Responses including any changes to be made to the Greater Nottingham Strategic Plan or its supporting evidence base.
- 7.2 The Strategic Background Distribution Paper covered both the Nottingham Core and Outer HMAs to coincide with the study area adopted by the Logistics Study prepared by Icení (Nottingham Core and Outer HMA Logistics Study August 2022). This Site Selection Paper therefore summarises the site selection process set out in the Strategic Distribution Background Paper and updates it accordingly and relates it to the Greater Nottingham Strategic Plan Area for the purposes of informing the site selection process for Strategic Distribution Sites to be allocated in the Greater Nottingham Strategic Plan Publication Draft.
- 7.3 The starting point for this work was the creation of a pool of potential sites known as 'Reasonable Alternatives'. These were sites which, in the view of planning officers, warranted consideration in order to ensure that sufficient regard was had to alternative options. This was done to ensure that the Local Plan process is robust and accords with the requirement that consideration is given to reasonable alternatives through the Sustainability Appraisal process.
- 7.4 These 'Reasonable Alternatives' have been identified through a "call" for potential major distribution sites undertaken during the autumn of 2022 and a number of sites were promoted by developers / landowners as part of this exercise. Other potential sites were identified by the Councils including draft allocations in emerging Local Plans or sites promoted for employment uses through the Greater Nottingham Strategic Plan Growth Options Consultation July 2021 and February 2022, and the Preferred Approach Consultation in January 2023.
- 7.5 A sieving exercise considered the initial pool of sites and removed unsuitable sites through a sieving assessment which was relatively broad brush in nature and gave consideration to site size, proximity to Areas of Opportunity (as identified in the Logistics Study August 2022) and whether the site has good connections to the highway network. In terms of site size, a certain amount of flexibility was applied in the context that sites should be in the

region of 25 ha or more (this minimum site size is suggested in the Logistics Study). More detail on this initial “sieving” exercise is set out in the Strategic Distribution Background Paper (September 2023). During the consultation exercise on the Preferred Approach for Distribution comments were received objecting to the omission of sites as reasonable alternatives from the initial pool of sites and for additional sites to be considered. The Report of Responses to the Strategic Distribution Preferred Approach consultation sets out the Councils’ arguments against including any omitted sites or adding additional sites as reasonable alternatives.

7.6 As set out in the Strategic Distribution Background Paper, thirteen sites were shortlisted for further consideration across the Study Area. In some cases, the sieving assessment identified potential impacts which will need further consideration but did not rule the site out from being considered a “reasonable alternative”. The Logistics Study also acknowledged that sites below 25 hectares would contribute towards meeting needs for warehousing and logistics space. In general, most of the sites were rejected on the basis of being too small, remote from Areas of Opportunity, or having poor access to the motorway or dualled highway network.

7.7 In addition to identifying Areas of Opportunity, the Logistics Study contains recommendations on relevant criteria for site selection largely relating to operational requirements including:

- Good connections with the strategic highway network – close to a junction with the motorway network or long-distance dual carriageway. Motorway/dual carriageway junctions and the approach routes should have sufficient network capacity;
- Sufficiently large and flexible in its configuration so that it can accommodate the range of sizes of distribution centre warehouse units now required by the market, with a minimum size of 25 ha being recommended but ideally seeking sites of 50 ha and above which is more representative of delivering a comprehensive logistics park including infrastructure, screening and biodiversity net gain;
- Served from an electricity supply grid with sufficient capacity to permit the charging of large fleets of battery-electric freight vehicles simultaneously, or part of the electricity supply grid which can be upgraded (network reinforcement) relatively easily and at a reasonable cost, or include proposals such as solar panels, solar farm, wind farm or other sustainable energy that reduce reliance on the grid;
- Accessible to labour, including the ability to be served by sustainable transport, and located close to areas of employment need; and
- Located away from incompatible land-uses

7.8 In relation to the criterion on electricity grid connections, the Councils have relied on information provided by promoters or general assumptions about

grid connectivity. Further assessment of the electrical grid connection would be required including seeking views from the relevant utilities providers at the Regulation 19 consultation on the Publication Draft.

- 7.9 The criterion above emphasises the importance of good connections with the strategic highway network and the Logistics Study explains that it has not considered the development of rail served sites for the reasons set out in paragraph 10.3 of the Logistics Study. Whilst the Councils accept this and 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. 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. This document can be accessed below:

<https://www.gov.uk/government/publications/transport-decarbonisation-plan>

## Approach

- 7.10 Information was collected on the following criteria (set out in the Table below) as recommended by the Logistics Study and planning policy, flood risk, environmental, heritage, landscape and other potential constraints identified by the Councils as follows:

Criteria	Reason	Source
Site name and reference	Unique and consistent name and reference number for clarity.	
Site size by area (hectares) floorspace (square metres)	As recommended in the Logistics Study.	<a href="https://www.gnplan.org.uk">Evidence Base (gnplan.org.uk)</a>
<ul style="list-style-type: none"> <li>Approximately 25 hectares and above.</li> </ul>		
Within or close to an Area of Opportunity	As recommended in the Logistics Study.	In house assessment

Criteria	Reason	Source
<p>as identified in the Logistics Study:</p> <ul style="list-style-type: none"> <li>• Area adjacent to M1 Junction 28 and 27 (Sutton in Ashfield, Alfreton, Kirkby in Ashfield and towards Hucknall);</li> <li>• Area adjacent to M1 Junction 26 (Langley Mill, Eastwood and Kimberley);</li> <li>• Area adjacent to M1 Junction 25;</li> <li>• Area adjacent to A453; and</li> <li>• Area surrounding Newark (along A1 and A46).</li> </ul>		
Existing use	The current use of the site is recorded	SHLAA Review 2023 / SHELAA or promoter
Extension to an existing site or a new site	As recommended in the Logistics Study.	In house assessment
Known land contamination	Whether there is known or likely ground contamination resulting as a consequence of previous use for e.g. former industrial land.	SHLAA Review 2023 or promoter
PDL or greenfield	As recommended in the Logistics Study.	SHLAA Review 2023 or promoter

Criteria	Reason	Source
	The NPPF requires that the reuse of previously developed land is encouraged. In making decisions preference will be given to sites which are previously developed or contain a proportion of previously developed land.	
SHLAA conclusions (if available)		SHLAA Review 2023
Growth Options Study Conclusions (if relevant)		The Growth Options Study (AECOM July 2020)
Viability (if known)	If the site were selected as a strategic allocation, its viability is considered in the Plan Wide Viability Assessment as part of local plan preparation.	Information submitted by promoter.  Plan Wide Viability Study 2024
Utilities (if known)	As recommended in the Logistics Study.  Responses from infrastructure providers will also be required.	Information submitted by promoter.

Criteria	Reason	Source
Blue and green infrastructure	Compliance with NPPF which promotes the conservation and enhancement of BGI. Impact on BGI infrastructure is an important part of making decisions.	Greater Nottingham Blue and Green Infrastructure Strategy July 2021  <a href="https://www.gnplan.org.uk/evidence-base/">https://www.gnplan.org.uk/evidence-base/</a>  <a href="#">Green Infrastructure Strategy 2015 – 2030 (BBC)</a>
Whether the site is in Green Belt	The protection of the Green Belt is an important factor and changes to Green Belt boundaries require 'exceptional circumstances'.	Greater Nottingham Planning Partnership Green Belt Review (2023) and Background Paper, (2023).
Agricultural land classification	Compliance with NPPF which prioritises the development of poorer quality land.	SHLAA Review 2023  The 1:250 000 Series Agricultural Land Classification, Natural England.
Impact on air quality	Whether the site is within or near an Air Quality Management Area, where poor air quality is identified and pollution exceeds air quality objectives.	SHLAA Review 2023
Transport and accessibility  <ul style="list-style-type: none"> <li>• Good connections with the strategic highway network</li> <li>• Close to a junction with the</li> </ul>	As recommended in the Logistics Study.	Transport - in house assessment with input from National Highways and County Highways.

Criteria	Reason	Source
<p>motorway network or long-distance dual carriageway.</p> <ul style="list-style-type: none"> <li>• The approach routes should have sufficient network capacity.</li> <li>• Good access to labour markets</li> <li>• Good access to public transport</li> </ul>	<p>Compliance with the NPPF which requires impacts from development on transport network are addressed.</p>	<p>Transport Assessment for Greater Nottingham April 2024.</p> <p>Accessibility to labour market - in house assessment.</p>
Flood risk	<p>The NPPF seeks to steer development away from areas at high risk of flooding. Although employment uses are regarded as one of the less vulnerable uses to flood risk it is important that strategic distribution facilities as important to the flow of goods are not impeded by flood water.</p>	SHLAA 2023 Review
Natural environment	<p>The NPPF requires that designated sites of nature conservation interest should be protected in line with their importance. The presence of sites of designated nature conservation interest within or in the vicinity of</p>	SHLAA 2023 Review



Criteria	Reason	Source
	the site is considered important.	
Historic environment	The protection and enhancement of designated and non-designated heritage assets such as Listed Buildings and Conservation Areas is a requirement of the law.	SHLAA 2023 Review  In house Heritage Impact Assessments
Landscape and topography	Compliance with the NPPF. The impact of development sites in terms of the potential impact on the landscape and visual amenity is a key issue for large scale distribution sites.	Greater Nottingham Landscape Character Assessment June 2009
Compatibility of surrounding uses	Compliance with the NPPF which requires developments create places with a high standard of amenity.  Is also recommended in the Logistics Study.	In house assessment
Consultation response to Preferred Approach	It is important that the views of local people are taken into account when preparing the Greater Nottingham Strategic	Preferred Approach:  Response to the Greater Nottingham Strategic Plan: Distribution and Logistics Preferred Approach November 2023.

Criteria	Reason	Source
	Plan. Responses made during previous consultations may provide additional relevant evidence for a certain site or broad area.	

## Decision Making

7.11 As part of this process two key decisions have been made. Firstly, whether there are any ‘showstoppers’ which mean that the site should not be allocated. Secondly, whether, having regard to the available alternatives, the site should be recommended for allocation.

7.12 The first decision is taken with reference to the site in isolation. This determines whether the site can be allocated. This includes considering whether:

- the site could enable the transfer of freight onto the rail network, or, if direct access to the rail network is not available, is it in close proximity to an existing rail freight interchange;
- whether the site is located close to centres of population and employees and is accessible by public transport and active travel infrastructure;
- whether, within these centres of population, there are areas of high unemployment and deprivation;
- whether there are good connections with the strategic highway network – close to a junction with the motorway network or long-distance dual carriageway. Motorway/dual carriageway junctions and the approach routes should have sufficient network capacity;
- if the site is within the Green Belt, whether this would undermine a key purpose of Green Belt policy;
- whether the site is being promoted for development;
- whether there are other policy designations (such as open space or employment) and evidence suggesting the designation should continue;
- whether a significant portion of the site is at risk of flooding; and

- whether development of the site would cause significant harm to a number of the factors identified (such as heritage, landscape).

7.13 Determining whether a site should be allocated is a comparative exercise between the sites being considered taking into account whether the site is sustainably located and can utilise low carbon transport infrastructure, and whether there are environmental or other constraints which limit the extent to which the scale of need in the Logistics Study should be met within the Plan Area.

## Recommendations

7.14 The assessment of reasonable alternatives has identified eight sites within the Plan Area that are potentially suitable and two that are proposed for allocation namely the Former Bennerley Coal Disposal Point and Ratcliffe on Soar Power Station (part of site) are within the Plan Area. The reasonable alternative sites are as follows:

- **Former Bennerley Coal Disposal Point (BBC-L01) – Proposed for allocation**
- Gilt Hill (smaller site) (BBC-L02a)
- Gilt Hill (larger site) (BBC-L02b)
- Low Wood Road (BBC-L05)
- New Farm (BBC-L06)
- South east of Junction 26 (BBC-L08)
- **Ratcliffe on Soar Power Station (RBC-L01) – Proposed for allocation (part site)**
- Nottingham Gateway (RBC-L02)