

GREATER NOTTINGHAM STRATEGIC PLAN

Statement of Common Ground between Broxtowe Borough Council, Nottingham City Council, Rushcliffe Borough Council (the Plan-making Authorities) and Historic England

This Statement of Common Ground sets out areas of agreement and/or disagreement between the Plan-making Authorities preparing the Greater Nottingham Strategic Plan (GNSP) and Historic England. It is based on consultation through the preparation of the GNSP.

The following consultations were undertaken as part of preparing the GNSP:

- Growth Options Consultation (July 2020)
- Growth Options Consultation (February 2021)
- Preferred Approach (January 2023)
- Strategic Plan: Distribution and Logistics Preferred Approach (September 2023)
- Greater Nottingham Strategic Plan Publication Draft (2024)
- Greater Nottingham Strategic Plan Publication Draft (March 2025)

Historic England has provided comments at each stage of preparing the GNSP.

The table attached to this Statement of Common Ground (Appendix 1) summarises the position regarding the representations made by Historic England in relation to the Regulation 19 consultations and the effect of the proposed modifications on the specific representation. It shows where there is now agreement and where there is not agreement.

Areas where there is not agreement are highlighted in the table and are summarised below:

Policy 1 Clause 9:

Historic England recommend that there is consideration of renewable energy generation and the historic environment. There will be times when renewable energy generation is not appropriate in certain locations, due to the harm to the significance of heritage assets.

The Plan-making Authorities consider that Policy 11 (Historic Environment) would apply in these circumstances.

Policy 1: Paragraph 3.1.33:

Historic England state that embodied carbon should also be considered within heritage assets, as another reason for protecting heritage assets, resisting their harm and demolition and finding appropriate and viable uses for their future.

The Plan-making Authorities consider that Policy 11 (Historic Environment) would apply in these circumstances.

Policy 6, clause 3, g:

Historic England state that the policy references tall buildings within the Plan but provides no further context on what a tall building is within the context of Nottingham or how the Plan might take account of planning applications for a tall building. They remain concerned about how heritage assets may be affected and ensuring that key views are protected and consider that the term 'tall buildings' could be deleted from the policy and be reintroduced in a future Plan with the appropriate accompanying evidence.

The Plan-making Authorities consider that a policy to guide the development of Tall Buildings is required to ensure they contribute positively to Nottingham's townscape and skyline. Main and additional modifications are proposed to ensure the policy is justified and effective, see box below. A Tall Building Strategy has commenced and policy recommendations will be incorporated into a future Local Plan or Design Code (Supplementary Plan). Until new policy is in place, the proposed policy is required.

Proposed Main Modification

Policy 10

iii. ensuring tall buildings are well designed and attractive from all viewpoints, that their impact on neighbouring development is acceptable in terms of overshadowing, loss of light, impact on **the significance and setting of historic assets**, key views and amenity;

Proposed Additional Modification

3.6.24 Nottingham's historic, cultural and high quality built environment is a unique asset for the conurbation, which makes a positive contribution to the local character and distinctiveness of the City Centre and has the potential to make a more significant contribution to the economic wellbeing of the conurbation. The roles played by key historic and cultural assets such as the Castle, The Council House, The Lace Market and Wollaton Hall are critical to the success and diversity of the City Centre and will be enhanced wherever possible in bringing forward new City Centre development and regeneration. **Tall buildings (buildings that are substantially taller than their neighbours and/or which significantly change the skyline) can have a disproportionate impact on the locality and the wider city centre in terms of potential overshadowing, loss of light and amenity, and impacts on the significance and setting of historic assets and key views. Equally they can also offer an opportunity to create new 'landmark' buildings, aiding legibility of the City Centre and making a positive contribution to the City's skyline. To achieve this, the design should be of the highest quality, and have particular regard to the new buildings relationship with existing tall buildings, especially in terms of materials, massing, scale and proportion. The City Council is currently preparing a Tall Buildings Strategy to inform a future Design Code and/or Local Plan, and which will support the implementation of this policy.**

Policy 10, clause 2, k:

Historic England state there is limited reference to heritage within this section and what is meant by local distinctiveness and character. There should be reference to appropriate evidence base documents such as Conservation Area Appraisals and their Management Plans, as well as Historic Townscape Area Assessments etc. Prospective developers should also have certainty about what is expected from design and how they can meet the needs of the policy. They also query what evidence exists to support where key views and vistas are and whether this information likely to come forward in another way, for example through individual authority Design Codes.

The Plan-making authorities consider that key views, vistas, landmarks etc are included in existing Part 2 Local Plans and will also be included in future plans and Supplementary Plans/ Design Codes. This part of the policy should also be read in conjunction with Policy 11.

Policy 13:

Historic England consider that the policy would benefit from reference to heritage tourism.

The Plan-making authorities consider this is too specific for the policy and enhancement of key heritage assets which may be of interest are listed under Policy 11.

Issues agreed subject to further modifications:

Policy 1: Paragraph 3.1.35:

Historic England recommend adding 'protecting heritage assets' to the bullet point list.

The Plan-making authorities agree to add 'protecting heritage assets' to the bullet point list.

Proposed Additional Modification:

3.1.35 Embodied carbon can be minimised where the following principles are followed:

- reusing and retrofitting existing built structures
- utilising repurposed or recycled materials
- choosing low-carbon materials (e.g. timber, lime mortar / render or low carbon production materials)
- fabric first approach to holistically reduce embodied and operational carbon
- low-carbon operational water use
- design for future deconstruction and reuse
- design an efficient building shape and form
- incorporate carbon sequestering materials

- design for durability and flexibility
- address embodied and operational carbon reductions together
- determine expected building lifespan
- source materials locally
- minimise waste
- efficient and lightweight construction
- follow circular economy principles
- **protecting heritage assets**

Policy 10, clause 2, k:

Historic England state the clause should relate to the significance of heritage assets, including setting rather than simply setting. It is the significance of heritage assets that are protected and this relates to setting, where setting make a contribution to significance.

The Plan-making authorities propose to amend wording to read 'significance of heritage assets, including their setting'.

Policy 10, Paragraph 3.10.14:

Historic England request amendment to relate to the 'significance of heritage assets, including their setting'.

The Plan-making authorities propose to amend wording to read the 'significance of heritage assets, including their setting'

Proposed Main Modification

Policy 10 (2) k) ~~setting~~ **significance of heritage assets, **including their setting**.**

Proposed Additional Modification

3.10.14:Policy 10 includes the design principle that the design of development would need to be considered in the context of the ~~setting~~ **significance** of identified heritage assets, **including their setting**, within the locality and have regard to nationally designated heritage assets....

Policy 11, Clause 3, d:

Historic England request amendment of wording to replace 'preserves' with 'conserves' to reflect the wording of the NPPF.

The Plan-making authorities propose to amend wording to replace preserve with conserve:

Proposed Main Modification

Policy 11 (3) d) **'seeking and promoting** ~~considering~~ improvements to the public realm **in a way which** ~~preserves~~ **conserves or enhances the significance of heritage assets and their settings** ~~and the setting of heritage assets within it;~~

Policy 11, clause 3, g:

Historic England state that every effort should be taken to ensure that development will proceed before the unavoidable loss of a heritage asset is allowed. Recording of any heritage asset and relevant information should be updated to the Historic Environment Record (HER) as a minimum.

The Plan-making authorities propose to amend clause 3, g: "requiring the recording of heritage assets where there is a an unavoidable loss in whole or in part to the significance of that asset;"

Amendment also proposed to 3.11.8: "In a small number of cases the loss of a heritage asset may be unavoidable. In these cases, steps should be taken to ensure that the assets are appropriately recorded through updates to the Historic Environment Record (HER) as a minimum before they are damaged or destroyed."

Proposed Main Modification

Policy 11 (3) g) requiring the recording of heritage assets where there is a **an unavoidable** loss in whole or in part to the significance of that asset; and

Proposed Additional Modification

3.11.8 In a small number of cases the loss of a heritage asset may be unavoidable. In these cases, steps should be taken to ensure that the assets are appropriately recorded **through updates to the Historic Environment Record (HER) as a minimum** before they are damaged or destroyed.

Policy 11, Clause 3, h

Historic England consider that planning applications should be accompanied by a Heritage Impact Assessment (HIA) or similar to set out how the significance of heritage assets, including their setting, will be protected and enhanced. This should include reference to when harm may occur and how this can be avoided or mitigated. They consider that the policy requires amending in order to be effective and in line with Section 16 of the National Planning Policy Framework.

The Plan-making authorities propose to add this requirement to Clause 3 and to paragraph 3.11.9:

Proposed Main Modification

Policy 11 (3) i): requiring the submission of a Heritage Impact Assessment for proposals which affect heritage assets

Additional Modification

3.11.9: For proposals affecting heritage assets, planning applications must be accompanied by a Heritage Impact Assessment or similar. The Heritage Impact Assessment must set out how the significance of heritage assets, including their setting, will be protected and enhanced. This should include reference to when harm may occur and how this can be avoided or mitigated.

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SIGNED on behalf of Broxtowe Borough Council, Nottingham City Council, Rushcliffe Borough Council (the Plan-making Authorities):



Date:

Mark Thompson, Greater Nottingham Planning Partnership

SIGNED on behalf of HISTORIC ENGLAND



Date: 23 July 2026

Name: Kezia Taylerson, Historic Environment Planning Adviser, Historic England

Appendix 1:

Area of Plan	Historic England comments	GNSP Response	Historic England Response
Paragraph 2.2.8	We support the inclusion of this paragraph.	Comments noted.	N/A
Paragraph 2.3.2	We support the references to heritage within the Spatial Vision.	Comments noted.	N/A
Spatial Objective Six	We support the inclusion of this spatial objective.	Comments noted.	N/A
Paragraph 2.6.8	We welcome the inclusion of this paragraph. Is there a positive strategy to overcome the identified heritage at risk within the Plan?	Protecting and enhancing heritage forms a key objective within the GNSP.	Our comments related to specific heritage at risk within the Borough and if any sites on the at risk register can be positively benefitted through the Plan.
Area spatial portraits	We support the heritage section of the individual areas' spatial portraits.	Comments noted.	N/A
Policy 1, Clause 4 c	We support the inclusion of this clause.	Comments noted.	N/A
Policy 1, Clause 9	We recommend within this clause that there is consideration of renewable	The plan should be read as a whole. There is a specific	We are content for our comment to remain and to be

Area of Plan	Historic England comments	GNSP Response	Historic England Response
	energy generation and the historic environment. There will be times when renewable energy generation is not appropriate in certain locations, due to the harm to the significance of heritage assets.	policy in relation to the historic environment (Policy 11).	considered by the Planning Inspector/s.
Policy 1, Clause 13	We welcome the reference to heritage within this clause. Any amendments that have the potential to impact the water table could then have a wider effect on heritage assets, such as impacts on water logged archaeology	Comments noted.	N/A
Policy 1, Paragraph 3.1.33	Embodied carbon should also be considered within heritage assets, as another reason for protecting heritage assets, resisting their harm and demolition and finding appropriate and viable uses for their future.	Consideration of the impact on heritage assets would be considered as part of Policy 11.	We are content for our comment to remain and to be considered by the Planning Inspector/s.

Area of Plan	Historic England comments	GNSP Response	Historic England Response
Policy 1, Paragraph 3.1.35	We would recommend adding 'protecting heritage assets' to the bullet point list.	Consideration of the impact on heritage assets would be considered as part of Policy 11.	We are content for our comment to remain and to be considered by the Planning Inspector/s. (N.B. modification now proposed to address this comment)
Policy 6, clause 3, g	How will tall buildings impact upon the historic environment and the significance of heritage assets? What is meant by a tall building within the context of Nottingham City Centre? How have key views been ascertained? We are concerned about the impacts of tall buildings on the significance of heritage assets and want to ensure that the policy will be effective in its use.	A policy for tall buildings is required in the Plan, as there is no other development plan guidance for this type of development. Main and Additional modifications are suggested to amplify and justify the policy approach, and to ensure it is effective. See the section on Policy 6, clause 3, g above A Tall Building Strategy has commenced and policy recommendations will be incorporated into a future Local Plan.	Comments remain. The policy references tall buildings within the Plan but provides no further context on what a tall building is within the context of Nottingham or how the Plan might take account of planning applications for a tall building. We remain concerned about how heritage assets may be affected and ensuring that key views are protected etc. We consider that the term 'tall buildings' could be deleted from the policy and be reintroduced in a future Plan

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			with the appropriate accompanying evidence. We are content for the Planning Inspector/s to consider this issue in the context of the Plan.
Paragraph 3.6.24	We are supportive of this paragraph and its intention to protect the heritage tourism assets within the centre.	Comments noted.	N/A
Policy 10, clause 2, k	The clause should relate to the significance of heritage assets, including setting rather than simply setting. It is the significance of heritage assets that are protected and this relates to setting, where setting make a contribution to significance. Limited reference to heritage within this section and what is meant by local distinctiveness and character. There should be reference to appropriate evidence base documents such as Conservation Area	Agree to amending to include reference to the significance of heritage assets. <i>2 k) setting <u>significance</u> of heritage assets.</i> Key views, vistas, landmarks etc are included in Part 2 Local Plans, and will also be included in future Plan making.	Amend wording to read 'significance of heritage assets, including setting'. (N.B. modification now proposed to address this comment) We are content for our comment to remain and to be considered by the Planning Inspector/s.

Area of Plan	Historic England comments	GNSP Response	Historic England Response
	Appraisals and their Management Plans, as well as Historic Townscape Area Assessments etc. Prospective developers should have certainty about what is expected from design and how they can meet the needs of the policy. Key views and vistas are referenced; what evidence exists to support where these key views and vistas are? Is this information likely to come forward in another way, for example through individual authority Design Codes?		
Policy 10, Paragraph 3.10.14	The paragraph includes some useful information but could go further in setting out what the policy will mean in practice for the historic environment, in order to ensure the policy will be effective. The paragraph relates to setting again, see comments above. There is no reference to key views, vistas, landmarks etc. in relation to	Agree to amending to include reference to the significance of heritage assets. <i>3.10.14 - Policy 10 includes the design principle that the design of development would need to be considered in the context of the <u>setting</u> <u>significance</u> of identified heritage assets within the</i>	Would amend to relate to the 'significance of heritage assets, including their setting'. (N.B. modification now proposed to address this comment)

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	the historic environment. How is the issue of tall buildings being considered within the context of the design policy?	<i>locality and have regard to nationally designated heritage assets.</i> Key views, vistas, landmarks etc are included in Part 2 Local Plans, and will also be included in future Plan making. The issue of tall buildings principally relates to Nottingham City, who are developing a Tall Building strategy, which will be embodied in a future local plan for Nottingham City.	
Policy 11	We welcome the inclusion of a policy for the historic environment.	Comments noted.	N/A
Policy 11, Clause 1	It should be clear that the policy relates to protecting and enhancing the significance of heritage assets, including their setting. Where harm to heritage may occur, this should be resisted. The policy should set out what happens	Agree to amending to state when planning permission would be refused: <i>Proposals and initiatives will be supported where the historic environment and heritage assets and their</i>	Support the amendment.

Area of Plan	Historic England comments	GNSP Response	Historic England Response
	in the event of harm and how the application will be managed.	<i>settings are conserved and / or enhanced in line with their interest and significance. <u>Where they do not do so, they will be refused.</u> Planning decisions will have regard to the contribution heritage assets can have to the delivery of wider social, cultural, economic and environmental objectives.</i>	
Policy 11, Clause 2	The clause is welcomed, and it sets out what is important locally and how this should be protected. The beginning of the clause should have a catch all sentence that ensures the policy relates to all heritage assets, including different typologies and then goes on to outline some examples of what is meant by that. The list should be considered an example and not exhaustive. The clause should comply with Section 16	Consider that clause 2 is sufficiently clear as drafted. Minor change suggested to strengthen the policy and comply with the NPPF. <i>All elements of the historic environment have a presumption of being conserved, or enhanced, wherever possible, with a particular focus on securing enhancement to those which contribute towards the unique identity of areas and help</i>	No additional comments provided by Historic England.

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	of the National Planning Policy Framework.	<i>create a sense of place with further detail set out in existing Part 2 Local Plans or through future plan preparation.</i>	
Policy 11, Clause 3, c	The clause should relate to 'heritage assets'. Additionally, the clause should seek the appropriate reuse of heritage assets.	Agree to amending to refer to heritage assets and reuse. 3 c) <i>working with partners, owners and developers to identify ways to positively manage and make better use of historic <u>heritage</u> assets, <u>including securing appropriate reuse where applicable;</u></i>	Agree amendment.
Policy 11, Clause 3, d	The clause should relate to seeking improvements for the public realm which protect and enhance the significance of heritage assets, including their setting.	Agree to addition to the wording based on comments. 3 d) <i><u>seeking and promoting considering improvements to the public realm in a way which preserves or enhances the significance of heritage assets and their settings</u> and the setting of heritage assets within it;</i>	Support amendment, with one suggestion – amend 'preserves' with 'conserves' to reflect the wording of the NPPF. (N.B. modification now proposed to address this comment)

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Policy 11, Clause 3, f	In order to achieve this ambition, planning applications will need to be accompanied with appropriate archaeological evidence base including desk based assessment, and where necessary field evaluations, by an appropriate qualified professional.	This is a matter for validation requirements but additional text has been suggested to the justification text. <i>3.11.4 - When considering sites of potential archaeological importance, including those as identified on the Historic Environment Record for the area, the Councils will, where appropriate, request a prospective developer to arrange for an archaeological assessment and field evaluation <u>by appropriately qualified professionals</u> before any decision on a planning application is taken.</i>	Support amendment.
Policy 11, Clause 3, g	Every effort should be taken to ensure that development will proceed before the unavoidable loss of a heritage asset is allowed. Recording of any heritage asset and relevant information should be updated to the Historic	This is already covered within the NPPF and within existing Part 2 Local Plans.	We would anticipate to see this detail within a heritage policy. Comment remains. (N.B. modification now proposed to address this comment)

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	Environment Record (HER) as a minimum.		
Policy 11, Clause 3, h	Planning applications should be accompanied by a Heritage Impact Assessment (HIA) or similar to set out how the significance of heritage assets, including their setting, will be protected and enhanced. This should include reference to when harm may occur and how this can be avoided or mitigated. We consider that the policy requires amending in order to be effective and in line with Section 16 of the National Planning Policy Framework.	This is a matter for validation requirements.	We always seek a reference to the need to provide a heritage assessment to accompany a planning application, where harm to heritage assets may occur. The policy usually sets out the requirement for the heritage assessment and the justification text could contain the relevant detail. The Validation Checklist is usually then the vehicle to check that the appropriate information has been submitted to inform decision making. We are content for our comment to remain and to be considered by the Planning Inspector/s. (N.B. modification now proposed to address this comment)

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Policy 11, Clause 4	Unclear what is meant by this within the policy and what the ambition of the clause is.	Consider this clause is clear and relates to additional scrutiny which will be given to proposals which will adversely affect assets already at risk of harm or loss, or which have the potential to impact upon multiple heritage assets with significance derived from group value.	No additional comments provided by Historic England.
Policy 11: Monitoring indicators	Consider including an indicator that considers % of planning applications approved contrary to heritage advice, for example. The current indicator will provide a very limited picture.	Consider that existing monitoring indicators are appropriate.	Accept.
Policy 13	The policy would benefit from reference to heritage tourism.	Consider this is too specific for the policy and enhancement of key heritage assets which may be of interest are listed under Policy 11.	We are content for our comment to remain and to be considered by the Planning Inspector/s.
Policy 15	How is the historic environment being considered through the identification of transport initiatives/schemes	These matters are dealt with under Policy 11 and will also be considered as part of future	Accept that the detail will be available in future applications

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	across the Plan area? Are the schemes in the appropriate locations in respect of their potential harm to the significance of heritage assets? Are there any benefits for the historic environment, including the opportunity to better reveal the significance of heritage assets?	plan preparation by each authority.	and strategies. We will engage where relevant.
Policy 16, clause 3, f	The policy should refer to the significance of heritage assets including setting. The policy should be clear that the historic environment is a component of Green/Blue infrastructure and be referenced accordingly.	This would be considered as part of Policy 11.	We note the Council's viewpoint. Historic England does always try to ensure that heritage is covered as a component of landscape/GI.
Greater Nottingham Heritage Assets Assessment July 2024	We welcome the preparation of this evidence base document to provide additional evidence base to support the Local Plan process. Though we note in areas the detail is very limited.	Comments noted. The Heritage Assets Assessment is considered to be adequate to inform the preparation of the Strategic Plan.	N/A

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Policy 19 Boots	There is very limited data available for this site in respect of the harm to heritage assets on site and their significance. We have concerns and would anticipate to see more information and mitigation measures included within the policy text. However, we understand that planning permission has been approved and development has now commenced, from information contained within the Plan. Unclear on references on page 163 if development has commenced? The HIA only relates to the presence of planning applications for the site.	The site has planning permission and is under construction. Should further development be proposed, this will be subject to a new heritage assessment.	Given the advanced stage of this site we have no further comments.
Policy 22 Bennerley	We remain concerned about this site. There is limited information within the Plan on what the harm to the significance of the heritage asset at Bennerley Viaduct	These important considerations will be carefully assessed, in liaison with Historic England as part of future planning applications. Part 2.D.14 of the policy	No further comments provided but detailed comments provided on planning application.

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	Grade II* is and how/if this can be avoided/mitigated through development. Whilst the Plan does mention that development needs to be sympathetic, what does this mean and how will development be brought forward to avoid/ minimise harm? The Heritage Impact Assessment (HIA) for the site is very limited in detail and states that the detail will be known at planning application stage. There is some limited information relating to the need for the southern area of the site to be considered as it is more sensitive to harm for the heritage asset, given its adjacent location. We will require additional detail about the harm to the significance of the heritage asset and how/if avoidance/mitigation measures can be included within the Plan to overcome harm.	incorporates strong protection for the Viaduct and its setting and a main modification is suggested to strengthen this further. The justification text is also proposed to be amended. <i>Part 2 D 14-<u>15</u>. A high standard of design will be required at this site, in particular to ensure that any built or other development is sympathetic to the Grade II* Listed Bennerley Viaduct <u>and safeguards the viaduct's significance. Development should also safeguard</u> existing blue and green infrastructure assets within the local area, landscape character, and the area of the new Country Park.</i> <i>Paragraph 3.22.10: Development in this location will impact the setting of the listed Bennerley Viaduct, which is important for historical and architectural reasons and which forms a</i>	

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		<i>major feature in the landscape of the Erewash Valley. Recent enhancements to the structure and its surroundings have arisen from the investment of significant public funds and the commitment of local amenity groups. It is therefore essential that the design of the development, including the height and siting of buildings, minimises the impact to the setting of the viaduct.</i> <u><i>Development proposals should include visual impact assessments, demonstrate how key views of the viaduct would be protected, include landscape buffering and should use appropriate materials to preserve the legibility of the wrought iron lattice structure.</i></u> Agreed that continuing dialogue with Historic England regarding the development of this site will be essential.	

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Policy 23 Top Wighay Farm	We remain concerned about this site. There is limited information within the Plan on what the harm will be to the significance of the heritage assets identified, including Annesley Hall Grade II*, Linby Conservation Area, including St Michael's Church Grade II*, and how/if this can be avoided/ mitigated through development. Whilst the Plan does mention that development needs to respect the setting of these heritage assets it does not discuss significance or provide any detail of what specific avoidance/mitigation measures are available that may be able to overcome harm. There is reference to the need to protect the historic watercourse which we support and would welcome additional detail on how this can be achieved. The Heritage Impact Assessment for the	This site no longer forms part of the Greater Nottingham Strategic Plan following the withdrawal of Gedling. Gedling are working on producing a separate Local Plan.	Comments noted.

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	site is fairly limited, and focusses largely on visual setting issues. We consider that the HIA needs to be further developed to understand what/ if specific mitigation measures can be included to overcome harm. There is reference to a green buffer but this is not linked in the Plan to any heritage mitigation measures.		
Policy 25 Broad Marsh	The HIA sets out how a wide number of heritage assets have the potential to be harmed as a result of this proposed development, as well as how there are opportunities for positive impacts and enhancements for heritage assets. The HIA does detail a number of ways in which the allocation could mitigate harm to the historic environment and some of these are transferred through into the Plan. Given the nature of heritage assets that	The heritage implications of the proposed development are acknowledged (Policy 25 Part E9, E10 and E11). These are best addressed through the master planning process to be led by Homes England. There are active and ongoing discussions between Homes England, Historic England and NCC with regard to the site's development.	No further comments provided.

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	could be affected and the potential for harm; we require a meeting with the Council to discuss the findings of the HIA and the site allocation policy and to assess what amendments may be required in order to ensure the policy is effective and harm to heritage is avoided/minimised.		
Policy 26 Edwalton	This policy is confusing as it relates to the need to protect the significance of heritage assets, yet the justification table states that there are no heritage assets that could be affected. The HIA for the site has no information.	It is sensible to retain mention of heritage assets within the policy should any relevant issues arise which are currently unknown.	N/A
Policy 27 Bingham	We note that this site now benefits from planning permission and that heritage issues have been considered within the planning permission. Given this information from the Plan we	Comments noted.	N/A

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	have no further comments to raise at this time.		
Policy 28 Newton	We note that this site now benefits from planning permission and that heritage issues have been considered within the planning permission. Given this information from the Plan we have no further comments to raise at this time.	Comments noted.	N/A
Policy 29 Cotgrave	There is no reference to any heritage issues within the Plan or justification text. Yet the text also states that heritage issues have been dealt with as part of the planning permission. This is confusing and should be amended. We note that the Plan states that planning permission has been approved for the site.	The supporting text in respect of heritage identifies that there are no issues that need to be dealt with. Any amendments to the policy or supporting text are unnecessary.	N/A
Policy 30 South of Clifton	There is no information in the Plan about the heritage implications and what harm to the significance of heritage	The summary of constraints states that development will not impact on any heritage assets as there are no	No further comments provided.

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	assets there will be. The justification text states that heritage will form a consideration of the phasing applications to come. What is the harm to the significance of heritage assets and how can this harm be avoided/mitigated? The text also states that no heritage assets will be affected. The HIA states impacts for archaeological remains. We consider that the information for this site should be clarified and updated.	designated or non-designated heritage assets within close proximity of the site. Full applications for future phases of the site's development will include discussion of how the development could enhance local heritage assets through their design. The HIA identifies iron age or Roman archaeology away from the site near Glebe Farm at Gotham.	
Policy 31 Gamston	The HIA for this site is very limited but does identify harm to listed structures. There is a mitigation measure that is identified within the HIA but this is not drawn through to the Plan. There is a generic reference to heritage within the policy and the need for a further heritage strategy, but the strategic allocation policy should set out any harm to heritage and how this can be	The level of detail for a local plan policy is considered sufficient, alongside other separate policies specifically related to heritage matters and national policy and guidance. Policy 31 explicitly identifies a requirement for a heritage strategy. The HIA suggests policy "Incorporate pillboxes into GI infrastructure that connects them and protects their setting." The high-level	Comments noted.

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	avoided/mitigated through the policy. Additional information is required to make the policy justified/effective.	masterplan provided in figure 31.1 indicates how green infrastructure may be developed to enhance the pillboxes' setting. Detailed designs for green infrastructure and further mitigations against harm to the pillboxes will be a requirement of any planning application.	
Policy 32 Ratcliffe	Historic England has been involved in the Local Development Order for this site and will continue to engage, as and when required. If you have any questions regarding our involvement, please contact us.	Comments noted.	N/A