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Greater Nottingham Strategic Plan

Statement Regarding Councils' Note on Strategic Distribution (GNC 30)

Iceni Projects Limited on behalf of
GLP

July 2026

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ON BEHALF OF GLP

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Greater Nottingham Strategic Plan
STATEMENT REGARDING COUNCILS' NOTE ON
STRATEGIC DISTRIBUTION (GNC 30)

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1. INTRODUCTION

- 1.1 This Statement has been prepared by Icen Projects on behalf of GLP, following our previous Hearing Statement and comments at the Local Plan Hearing Session, in response to the Councils' Note on Strategic Distribution (GNC30).
- 1.2 This Statement provides GLP's comments on the issues raised in the Councils' post-hearings note in relation to strategic distribution, building on the issues raised in our previous representations.

2. GNC30 – HOUSING REQUIREMENT AND STRATEGIC DISTRIBUTION

Strategic Distribution

- 2.1 In response to issues raised during the Hearing Session, we note that the Councils are now proposing a main modification to Policy 5. This includes the deletion at part 1a of Policy 5 to the reference to rail connectivity, and a new section at part 1g, indicating support for development of additional strategic distribution floorspace of 25 ha or more, where there is a clear unmet need and various other criteria are met.
- 2.2 We support the proposed deletion at part 1a, which we consider appropriate to make the policy sound. As discussed in the Hearing, an unduly narrow focus on rail connectivity within specific sites would be unjustified. Rail freight connections require substantial scale to make them viable and significant demand is focussed on non-rail served locations such as the M1 corridor.
- 2.3 In relation to the proposed additional text at 1g, we object to this proposed main modification, which in our view would not be sound. As indicated at criteria g(i), the intention of the policy would be to allow additional development to come forward where there is a clear unmet need for strategic distribution floorspace. The policy wording does not however clarify whether the need being referred to relates to the Plan area, or the wider Greater Notts FEMA. Given the failure of the Plan to identify a specific need for the Plan area, we assume the Councils' intention is for this to relate to the wider FEMA need.
- 2.4 Notwithstanding the significant issues discussed at the Hearing, regarding the need that the GNSP is planning for, the lack of a requirement against that need, and the shortcomings in the identified supply, it was acknowledged by all parties that there will inevitably be an unmet need arising within the FEMA, given the (up to) 97.4 ha being allocated in Policy 5 will not meet the full need for strategic logistics across the Greater Notts FEMA.
- 2.5 As discussed previously, we consider this to be entirely reasonable, and it should not be for the Greater Notts authorities to meet the entirety of the identified need within their area. However, this inevitable unmet need will result in this policy being triggered immediately upon adoption of the Plan. Whereas the Councils' intention appears to be to allow additional windfall sites to come forward if required at a future date, should the Plan fail to deliver, in reality the policy as amended would allow for any additional sites meeting the relevant criteria to come forward immediately to help meet the inevitable unmet need within the wider FEMA.

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- 2.6 Fundamentally, if additional sites exist within the Plan area which are larger than 25 ha, are available for development, would support the spatial strategy, and would be suitable having regard to the other proposed criteria, the Councils would be aware of these sites through their site assessment work. If any such sites had been identified, and considered suitable for strategic logistics, these should have been allocated within the Plan from the start. On the basis that just two sites are allocated at part f of the policy, the conclusion must be that there are no other potential sites that meet the proposed criteria at part g and which the Councils would consider suitable for strategic logistics development.
- 2.7 The proposed modification would therefore not be effective in terms of boosting supply, and this mechanism cannot be relied upon to deliver any additional supply within the Plan period.
- 2.8 The proposed main modification does not address the fundamental issues raised in the Hearing session, including the lack of a clearly defined need for the Plan area, the lack of a clear requirement against that need, and consequently a lack of clarity on the quantum of the unmet need that other plans within the FEMA must take account of. The Councils' note also does not respond to various issues raised by representors regarding the supply (although we note the subsequent update to Q44b to reduce the contribution from the Bennerley Former Coal Disposal Point by 40,000 sqm), and we assume the supply will be subject to further questions or discussion in due course.
- 2.9 As discussed, there will inevitably be a shortfall arising within the wider FEMA following the adoption of the GNSP, as it would not be reasonable or feasible of this Plan alone to meet the identified needs for the wider Greater Notts area. Therefore other plans (particularly those neighbouring authorities with good strategic road connectivity) will need to address this shortfall. Consequently, the key requirement to make the GNSP sound is for Policy 5 to clearly define what share of the wider need applies to the Plan area, and what the Plan's requirement is against that defined need. The policy should then clearly state what the residual need is that other plans will be required to take into account. This is necessary to ensure the policy is positively prepared.
- 2.10 The proposed Main Modification does not address these fundamental soundness points and would not be effective in increasing the supply. Therefore we object to the proposed modification and encourage the Councils to consider further modifications to address the issues raised.