

Greater Nottingham Strategic Plan Examination

Initial Questions to the Councils (ID2)

Councils' Response

March 2026

Legal compliance

For the purposes of the examination, it is necessary to confirm what constitutes the Regulation 22 submission Plan and to clarify a number of other legal compliance matters.

Q1 Does the submission Plan comprise document SD/2?

Yes.

Q2 Is the document SD/2 the same as the Regulation 19 plan published for consultation between March and April 2025?

Yes.

Q3 Were the Regulation 18 and Regulation 19 consultations carried out in a manner consistent with the Statements of Community Involvement adopted by the respective Councils? Have any concerns been expressed about the procedure for commenting on the Plan (as distinct from the Plan itself)?

Yes, all consultations were carried out in accordance with the relevant Council's Statement of Community Involvement.

There have been no substantive representations criticising the procedure for commenting on the plan.

Q4 Was the Plan prepared in accordance with the relevant Local Development Schemes adopted by the respective Councils? Do those schemes require updating?

Yes. The Councils Local Development Schemes (LDS) were updated prior to submission (see [SD/15](#), [SD/16](#) and [SD/17](#)). They identify the Greater Nottingham Strategic Plan (GNSP) dates/milestones completed to date.

They anticipate an adoption of December 2026. Depending on progress made in the examination, the adoption date in the LDS may require updating in due course.

Q5 Has due regard been given to the aims set out in Section 149 of the Equality Act 2010 to advance equality of opportunity for those with protected characteristics? What evidence is there to show this duty has been met?

Yes.

The Councils have prepared an Equality Impact Assessment ([SD/8](#)) to support the GNSP. The document assesses the impact of the GNSP on those with protected characteristics. In addition, the Councils have determined that Care Experience (i.e. children in care, or those that have left care) should be treated as a Protected Characteristic.

Q6 Has a sequential, risk-based approach been taken to the location of development in the Plan in relation to flood risk? If so, what evidence is there to show that such an approach has been used in the allocation of sites in the Plan?

Yes. The Councils have prepared a Flood Modelling and Sequential Test Update 2025 ([CC/1](#)). This sets out how the Sequential Approach has been applied to each of the strategic allocations.

Duty to Cooperate

We note from the Duty to Cooperate Topic Paper SD/7 that a number of statements of common ground are still awaiting completion or clarification. These include statements of common ground with Leicestershire County Council, Historic England and National Highways. Please update us on progress on these statements.

Q7 Has there been any progress on the outstanding Statements of Common Ground?

The position with the outstanding Statements of Common Ground is as follows:

Leicestershire County Council – now signed.

Erewash Borough Council – now signed

Historic England – with Historic England to identify outstanding issues.

National Highways – undergoing redraft for National Highways consideration.

Q8 How have neighbouring or relevant local authorities and prescribed bodies been engaged in relation to strategic housing and employment land matters, and where is this set out?

Neighbouring or relevant local authorities and prescribed bodies been engaged in various ways, and these are set out in the Duty to Cooperate Statement 2025 ([SD/7](#)).

In summary, Ashfield District Council, Broxtowe Borough Council, Erewash Brough Council, Gedling Borough Council, Nottingham City Council, and Rushcliffe Borough Council, together with Derbyshire and Nottinghamshire County Council are the Greater Nottingham Planning Partnership (GNPP).

The GNPP is overseen by the Greater Nottingham Joint Planning Advisory Board (JPAB), a voluntary advisory body made up of planning/transport councillors from the constituent authorities. JPAB meets 4 times per year to consider progress on strategic planning matters across its area. Officer groups meet weekly to coordinate progress. Individual meetings are held on specific cross boundary issues where required, and a Statement of Common Ground has been prepared to inform this examination where appropriate. See the appendices to [SD/7](#).

Other prescribed bodies have been involved in a number of ways, set out for each body in section 5 of [SD/7](#).

Q9 What strategic housing and employment land issues were raised through any engagement? Was a formal request made by the Councils to other local authorities to assist with meeting the shortfall in housing and employment land, and where is this evidenced?

The outcome of engagement with prescribed bodies, including housing and employment land issues is set out in the Duty to Cooperate Statement 2025 ([SD/7](#)).

Formal meetings were held with relevant local planning authorities to discuss cross boundary issues, notes of these meetings are appended to the Statements of Common Ground in the appendices of ([SD/7](#)).

These formal meetings covered housing and employment matters. It was recognised that the GNSP was progressing under the 2024 NPPF transitional arrangements as the GNSP meets more than 80% of the 2024 Standard Method. In this context, each relevant local planning authority confirmed that as the transitional arrangements were complied with, there was no unmet housing need from the GNSP area. However, they each state that if it were determined that there was unmet need, they would not make provision for it through their local plans. Equally, there was no request from relevant local planning authorities for the GNSP area to meet any of their housing need.

In terms of general employment land, the GNSP is meeting its own need, and so there was no need to make a formal request for unmet need to be met. Equally, relevant local planning authorities are meeting their own need.

For strategic logistics development, in the case of Leicestershire local planning authorities and Amber Valley Borough Council at the time the Statements of Common Ground were prepared there was no current assessment of strategic logistics need in their areas, so it was not possible to determine whether there was excess capacity which could accommodate need arising in the Strategic Logistics Study ([EM/4](#)) area.

(NB it is understood that subsequent to the meetings with Leicestershire local planning authorities a Leicestershire Logistics study has been published).

Q10 What were the outcomes of the engagement in relation to strategic housing and employment matters, and where is this set out?

The outcomes of engagement in relation to strategic housing and employment matters are set out in response to Q 11 and [SD/7](#).

Sustainability appraisal

The following questions seek clarification and relate to the compliance of the Sustainability Appraisal (SD /5) (the SA) with the SEA Regulations, particularly in respect of the assessment of reasonable alternatives.

The SA assessed three alternatives in dealing with Nottingham City's unmet need :

'A - Nottingham City to meet their own housing need (as determined by the Government's standard method) including the 35% uplift (applied for those urban local authorities in the top 20 cities and urban centres list).

B - Nottingham City's unmet need split and included within Broxtowe, Gedling and Rushcliffe's housing targets.

C - Nottingham City to meet as much of the 35% uplift as possible and any unmet need is not redistributed to Broxtowe, Gedling and Rushcliffe housing targets.

Q11 What housing figures are each of the options based on?

The options were produced as part of the Preferred Approach Consultation ([PC/6](#)) undertaken in January 2023. Information on housing need and housing supply for each council was based on information in the Preferred Approach Housing Background Paper (2022) ([PC/20](#)). This used figures based on the Standard Method as at March 2022 which includes the urban uplift for Nottingham City Council:

	Standard Method Housing Need 2022-2038
Broxtowe Borough	6,240
Gedling Borough	7,952
Nottingham City	28,368
Rushcliffe Borough	9,952
Greater Nottingham	52,512

Q12 Does Option A assume that the other local authorities would meet their own housing need?

Yes, Option A assumes that the other local authorities would meet their own housing need in full.

Q13 What is the preferred option and where are the reasons for selecting it, and rejecting the alternatives, set out?

The Sustainability Appraisal (SA) Appendix D: Appraisal of Objectives and Policies ([SD/5d](#)) provides a commentary on the options considered on pages

113 -114. It concludes that “Option C has less adverse effects on the SA’s objectives, with no major adverse effects. The least sustainable option is Option B as this would result in a more unsustainable pattern of development.” Therefore, based on the assessment undertaken in the SA, Option C was preferred.

The SA assessed three alternatives in relation to housing need:

‘A - Use standard method as a minimum for housing targets. (NB this is a medium growth option and may require land release from the Green Belt).

B - Reduce the amount of housing required in order to avoid the loss of Green Belt, reduce harm to environmental assets and deliver a sustainable distribution of development.

C - Increase the minimum amount of housing required, if justified, by using an alternative methodology to the standard method for calculating housing need. This alternative method would consider demographic trends, market signals and economic forecasts’.

Q14 What housing figures underpin each of the options?

These options were also produced as part of the Preferred Approach Consultation ([PC/6](#)) undertaken in January 2023. Reference to the standard method is therefore based on the standard method as at March 2022, with the figures listed as part of the response to Q11. However, assessing these options was not based on using precise housing figures and each option reflected a growth scenario. Option A reflected a medium growth option, Option B reflected a low growth option and Option C reflected a high growth option. This approach was followed as the purpose of the SA process was to test growth options rather than precise housing figures.

Q15 Is Option A based on the 2023 standard method, including the 35% urban uplift?

As referred to in Q14, reference to the standard method in option A is based on the standard method as at March 2022 and therefore includes the 35% urban uplift. Option A was considered to be the ‘medium growth’ option.

Q16 What is the preferred option and where are the reasons for selecting it, and rejecting the alternatives, set out?

The Sustainability Appraisal (SA) Appendix D: Appraisal of Objectives and Policies ([SD/5d](#)) provides a commentary on the options considered on page 114. It concluded that:

“Broadly, the effects of the three options upon the SA objectives were similar. Notably their effects upon economic, shopping centres, health and well-being, community safety, social inclusion and transport objectives are either uncertain or unknown as effects will depend on the location of development. The major differences within these options related to the housing objective due to the amount of housing which would be delivered. It was also considered that Option C may result in increased negative impacts related to energy and climate change, pollution and air quality and natural resources and waste management due to increased land required for housing.”

The appraisal of these options then informed the approach adopted in the Preferred Approach and then into the Strategic Plan. Option B most closely aligns with the approach to overall housing targets as Nottingham City is not proposing to fully meet the 2023 standard method in full including the 35% uplift. Option B also reflected the approach based on using the 2024 standard method, where Broxtowe and Rushcliffe would not have fully met housing need based on the standard method. This approach allows for a sustainable distribution of development without some of the increased negative impacts which were identified, particularly as part of Option C.

The SA assessed four additional options in relation to transitional arrangements :

‘A – All authorities use 2024 standard method for housing targets.

B – All authorities set housing targets above the 2024 standard method.

C – All authorities set housing targets below the standard method (80% of standard method to meet transitional arrangements).

D – Broxtowe and Rushcliffe set housing targets at 80% of standard method (under transitional arrangements). Nottingham City set a housing target above the standard method based on supply figure.’

Q17 What is the preferred option and where are the reasons for selecting it, and rejecting the alternatives, set out?

The Sustainability Appraisal (SA) Appendix D: Appraisal of Objectives and Policies ([SD/5d](#)) provides a commentary on the options considered on page 114. It states: *“Due to the National Planning Policy Framework 2024*

transitional arrangements, additional options for housing targets were considered. All options scored broadly similar, with the only variances being based on the housing objective due to the varying amounts of housing they would deliver and Option B scoring major negatives in relation to Objectives 11, 12 and 16 due to the impact of additional housing provision.”

The preferred option, which was reflected in the housing targets set in the Plan, was Option D. This was considered to be an appropriate balance between meeting identified housing needs and minimising negative environmental impacts. It should also be noted that the options considered as part of the SA were assessing levels of growth associated with different scenarios rather than assessing how the housing targets have been derived at.

Q18 Given the response to our initial question of 2 February 2026, what is the Councils’ position on each of these options? If changed from the position taken in the SA, what implications does that have for the Plan?

The options considered are still relevant to the Plan as they assess various quantum of growth against the SA framework. Levels of growth have been assessed based on both the 2023 standard method and the 2024 standard method. However, how the quantum of development were derived at is not fundamental to the SA process and the key is assessing different levels of growth which the SA has set out and this has informed the housing targets within the Plan. It is considered appropriate that the implications of the transitional arrangements on housing targets, introduced in the 2024 NPPF, were assessed as part of the SA. Each of the options were considered reasonable alternatives for altering the housing targets and were therefore assessed.

The SA assessed reasonable alternatives in relation to Policy 5 : Employment land and economic development

Q19 Paragraph 8.57 of the SA identifies two reasonable alternatives or options in relation to ‘delivering the identified employment target’. Do Options A and B relate to all employment land including office, industrial and strategic distribution/logistics? If so, please explain how these relate to Options L -O in respect of Distribution and Logistics.

Options A and B relate to the overall employment land requirement and are framed around establishing the minimum amount of employment land and office space as identified in the Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study 2021 ([EM/5](#)).

Option A tests a policy approach that allocates employment sites that are attractive to the market in terms of accessibility, environmental quality and size, and which are capable of meeting the identified minimum employment land and office requirement. Option B establishes the same minimum employment land requirement but goes further by explicitly introducing a criteria-based policy approach for determining strategic employment sites specifically for logistics and distribution.

Options L–O are assessed separately within the SA as sector-specific alternatives, focusing exclusively on the provision and spatial strategy for strategic distribution and logistics development. They test different approaches to how, where, and to what extent the strategic logistics need should be met, independent from the general employment land options. Accordingly, Options L–O should be understood as sector-specific alternatives within the broader employment strategy framework established through Options A–B.

Q20 Does Option A seek to provide sites that would meet all of the identified employment need? How does Option B seek to deliver the identified employment need?

Option A does not explicitly state that it allocates to meet all employment need. Instead, it proposes allocating employment sites that are attractive to the market and establishing the minimum amount of employment land and office space identified in the Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study 2021 ([EM/5](#)). This approach emphasises the direct allocation of suitable employment sites across the plan area in order to meet the identified requirement and support economic growth and is the approach which was followed in the Aligned Core Strategy.

Option B similarly establishes the minimum employment land requirement but differs in how this need is delivered. Rather than relying primarily on allocation of specific strategic employment sites, it introduces a criteria-based policy approach for determining strategic employment sites for logistics and distribution. This enables strategic logistics development to be assessed against defined policy criteria, rather than through fixed site allocations within the plan.

Accordingly, both Options A and B set the wider employment strategy framework to meet the overall employment land requirement.

Q21 In relation to ‘offices’, the SA appraised Options C – G, some of which propose focusing office development within Sustainable Urban Extensions. Please clarify the locations of these Sustainable Urban Extensions?

The Sustainable Urban Extensions (SUEs) referenced in office Options C–G are the only sites explicitly identified as SUEs within the Sustainability Appraisal. All three are located within Rushcliffe and comprise Melton Road, Edwalton, East of Gamston / North of Tollerton, and Land South of Clifton. Field Farm in Broxtowe was considered as SUE as part of the ACS but no office or employment space was proposed as part of the allocation.

Q22 In relation to ‘sites,’ the SA appraised Options H -K. Does the appraisal of ‘Sites’ relate to all employment land including office, industrial and strategic distribution/ logistics?

In each of the options (H-K), the reference to sites applies to ‘all types’ of employment uses, including offices, industrial and strategic distribution / logistics. This follows the approach to employment sites undertaken as part of the Aligned Core Strategy. Additional options were then appraised, which applied only to specific types, as set out within Options H and I. Option H relates to ‘research, science and knowledge-based businesses’ and in Option I, it applies to ‘small medium enterprises including start up and incubator space’.

Q23 In relation to ‘distribution and logistics’, the SA appraised Options L - O, some of which refer to retaining the existing policy approach within the Aligned Core Strategy. Please explain what the existing Aligned Core Strategy approach is in relation to distribution and logistics?

The existing Aligned Core Strategy approach to distribution and logistics (Class B8 Storage and Distribution) is set out within Policy 4 (Employment Provision and Economic Development) of the Aligned Core Strategy, specifically parts (a), (d) and (h), on pages 59 and 60 of the Aligned Core Strategy. Paragraphs 3.4.15 to 3.4.24 of the Justification Text on pages 63 to 65 provide additional context.

The approach is to provide a range of suitable sites for new employment, including distribution and logistics, which are attractive to the market, especially in terms of accessibility, environmental quality and size, particularly where it will assist regeneration. Wherever feasible, rail accessibility for storage and distribution uses should be utilised.

The approach is also to have alignment between the Councils to ensure that a sufficient supply of land is maintained in Part 2 Local Plans, to provide a range

and choice of sites for new and relocating employment uses (including distribution and logistics).

Furthermore, the approach is to appropriately manage existing employment sites and allocations to cater for the full range of employment uses (including logistics and distribution) by:

- i) ensuring the allocations most attractive to the employment market remain available for employment uses;
- ii) retaining good quality existing employment sites (including strategic employment areas) that are an important source of jobs, and sites that support less-skilled jobs in and near deprived areas, or have the potential to provide start up or grow-on space; and
- iii) considering the release of sites that do not meet criteria (i) and (ii).

Q24 In light of the reasonable alternatives assessed through the SA in relation to Policy 5, please clarify which options have been selected, and where is this set out?

The options which were selected were as follows. In relation to the 'Strategic Approach', Option A was selected, although the appraisal of alternative approaches to Policy 5 highlighted that all options would have a positive impact on several of the objectives, particularly those that related to employment land.

In relation to 'Office Development', Option C was selected, although all options relating to new office development scored well, particularly those that focus new development in the City Centre, SUEs and Toton.

In relation to 'Sites', Options H, I and J were selected. Promoting sites including Toton and Radcliffe on Soar power station scored particularly well, given the nature of those sites, when compared to a more general option of promoting a wide range of sites for small and medium enterprises. Retaining poor quality employment sites scored less well than redeveloping these sites, particularly in terms of the impact on community safety and air quality.

In relation to 'Distribution and Logistics', Option O was selected. Whilst both Options N and O have the potential to locate new development in areas served by existing infrastructure, Option O would better meet the needs of logistics development by potentially being located away from the city centre (minimising impact on pollution and flood risk) and benefitting from good access to the road and rail network.

The conclusions are set out on page 177 of the Sustainability Appraisal Appendix D - Appraisal of Objectives and Policies ([SD/5d](#)). The assessment of the options is set out within schedules on pages 126 to 171 of this appendix.

Selecting the reasonable alternative site options

Q25 According to the SA and the Site Selection Report (September 2024) (SS4), a 'sieving' exercise was undertaken to remove unsuitable sites through the application of a traffic light (or RAG) process to leave a shortlist of sites with a 'green rating' that were taken forward for further assessment. Paragraph 9.6 of the SA sets out the approach to the 'sieving' exercise undertaken. However, the criteria against which the sites are assessed and subsequently categorised as 'red', 'amber' or 'green' are unclear. Please could the Council clarify the criteria used to rate the sites as 'red', 'amber' or 'green'?

Sites classified as 'green' were considered to be 'reasonable alternatives' for strategic housing/mixed use, employment, or logistics / distribution, and were therefore carried forward for appraisal. Strategic sites for housing or mixed use were defined as those sites with a minimum capacity of 500 homes. There were exceptions in cases where it was considered that adjacent sites which did not meet the capacity requirements could be combined to create sites of 'strategic' size (an example of which is Site B09.2PA - North of Toton), or where sites had previously been allocated in the Aligned Core Strategy (an example of which is B08.4PA - Field Farm).

Sites classified as 'amber' were listed as being kept under review in the event additional sites were required and either the site threshold changed, or the strategy changed. These sites either fell below the threshold being used for strategic sites or were not in accordance with the strategy of the Strategic Plan as consulted on at Regulation 18 stages and carried forward into the Plan.

Sites classified as 'red' were not considered to be reasonable alternatives, for example, due to their isolated location or being significantly below the strategic threshold.

Similar criteria were applied in relation to strategic employment and distribution / logistics sites. In the case of sites for strategic distribution / logistics, the identification of sites as reasonable alternatives was undertaken within the Strategic Distribution Background Paper. This considered their scale (sites should be over 25 hectares), access to the strategic highway network, and location (within Areas of Opportunity as identified in the Nottinghamshire Core & Outer HMA Logistics Study).

Sites could also be classified as 'red' in cases where there was not considered to be sufficient information in relation to the site or proposed development to reach an informed judgement.

Further Justifications for the assessment of each site are set out within the '*Is this a Realistic Option*' sections of the schedules at the start of Sustainability Appraisal Appendices: 'E' (Broxtowe) on pages 5 – 14 ([SD/5e](#)) ; 'G' (Nottingham City) on pages 4-8 ([SD/5g](#)); and 'H' (Rushcliffe) on pages 6 – 22 ([SD/5h](#)). Justification for the classification of each site and any exceptions are explained within these sections.

Consultation on the SA and integration with plan -making

Q26 Please set out the timeline for the consultations that were undertaken in relation to both the SA and the preparation of the Plan, including the title of the documents consulted upon and the consultation dates.

Greater Nottingham Strategic Plan (GNSP) Consultation	Sustainability Appraisal (SA) Document included in consultation	Consultation Dates
GNSP Growth Options Consultation, July 2020 and February 2021	SA Scoping Report (PC/2) and Appendices A (PC/3) & B (PC/4) , July 2020	6/7/2020-14/9/2020 and 10/2/2021-24/3/2021
GNSP The Preferred Approach, January 2023	Preferred Approach Sustainability Appraisal Report including Appendix A and B (PC/7); Greater Nottingham Strategic Plan Authorities Preferred Approach Sustainability Appraisal: Appendix C (PC/8); PC/9 Preferred Approach Sustainability Appraisal: Appendix D (PC/9); Preferred Approach Sustainability Appraisal: Appendix E Broxtowe Sites (PC/10); Preferred Approach Sustainability Appraisal:	4/1/2023-14/2/2023

Greater Nottingham Strategic Plan (GNSP) Consultation	Sustainability Appraisal (SA) Document included in consultation	Consultation Dates
	Appendix F Gedling Sites (PC/11); Preferred Approach Sustainability Appraisal: Appendix G Nottingham City Sites (PC/12); Preferred Approach Sustainability Appraisal: Appendix H Rushcliffe (PC/13)	
Distribution and Logistics Preferred Approach, September 2023	Sustainability Appraisal Report Preferred Approach: Strategic Distribution and Logistics Sites (PC/24)	26/9/2023-7/11/2023
<p>GNSP Publication Version, September 2024 (Regulation 19 Document)</p> <p>N.B This version of the plan included Gedling Borough Council and the documents are not include in the examination library.</p>	Sustainability Appraisal Non-Technical Summary Sustainability Appraisal Main Report Sustainability Appraisal Appendix A: Review of Plans and Programmes Sustainability Appraisal Appendix B: Baseline Sustainability Appraisal Appendix C Consultation Comments Sustainability Appraisal Appendix D Appraisal of Objectives and Policies Sustainability Appraisal Appendix E Broxtowe Sites	4/11/2024-16/12/2024

Greater Nottingham Strategic Plan (GNSP) Consultation	Sustainability Appraisal (SA) Document included in consultation	Consultation Dates
	Sustainability Appraisal Appendix F Gedling Sites Sustainability Appraisal Appendix G Nottingham City Sites Sustainability Appraisal Appendix H Rushcliffe Sites	
GNSP Publication Version, March 2025 (Regulation 19 Document)	Sustainability Appraisal Non-Technical Summary (SD/4) Sustainability Appraisal Main Report (SD/5) Sustainability Appraisal Appendix A: Review of Plans and Programmes (SD/5a) Sustainability Appraisal Appendix B: Baseline (SD/5b) Sustainability Appraisal Appendix C: Consultation Comments (SD/5c) Sustainability Appraisal Appendix D: Appraisal of Objectives and Policies (SD/5d) Sustainability Appraisal Appendix E: Broxtowe Sites (SD/5e)	12/3/2025-25/4/2025

Greater Nottingham Strategic Plan (GNSP) Consultation	Sustainability Appraisal (SA) Document included in consultation	Consultation Dates
	Sustainability Appraisal Appendix G: Nottingham City Sites (SD/5g) Sustainability Appraisal Appendix H: Rushcliffe Sites (SD/5h)	

Habitats Regulations Assessment

Q27 Does the withdrawal of Gedling Borough Council have any implications for Habitats Regulations Assessment of the Plan? Is the HRA report dated July 2024 still relevant? Was Natural England reconsulted?

It is not considered that the withdrawal of Gedling has implications for the Habitats Regulations Assessment (HRA). The HRA assessed the GNSP (which included Gedling at the time). However, the submitted version of the GNSP has substantially the same effect on the three remaining plan making authorities, there is no change in strategy, apart from the deletion of Gedling policies and references, other changes to policies are de minimis, and there are no changes in allocations. The HRA is therefore considered to remain appropriate to the submitted GNSP.

Natural England were consulted as part of the regulation 19 GNSP and made no comments in relation to the HRA.

Recommending modifications

Section 20 of the Planning and Compulsory Purchase Act 2004 allows the Council to request us to recommend modifications to the Plan to make it legally compliant and sound in the event that we find it is not so. If that request is made, then Section 23 of the Act requires that any modifications we recommend must be incorporated into the Plan.

Q28 In the event that we find them to be necessary, do the Councils wish us to recommend modifications to make the Plan legally compliant and sound?

Yes.

Q29 Have the suggested main and other modifications in document SD/11 been subject to any consultation or sustainability appraisal/strategic environmental assessment?

No consultation has taken place on the suggested Main or Other Modifications, it is anticipated that if these Main Modifications are accepted by the Inspectors, they would be consulted on alongside any further Main Modifications recommended during the course of the examination.

The suggested Main Modifications in [SD/11](#) have been screened for Sustainability Appraisal purposes, and where necessary further Sustainability Appraisal has been undertaken, see Sustainability Appraisal Addendum Suggested Main Modifications: Screening of Changes November 2025 ([SD/13](#)).

The Other Modifications have not been screened or assessed.

Suggested modifications may be useful to our examination of the Plan in correcting errors in the Plan and/or addressing matters raised during the Regulation 19

Consultation. We will consider these in more detail as the examination progresses. **We ask that the Councils reformat document SD/11 into two separate documents, the first containing what they consider to be main modifications (which alter the meaning of policies in the Plan) and the second additional modifications (which are minor in nature, such as typo corrections and additional explanatory text which do not alter the meaning of policies).** Representors will have the opportunity to comment on suggested modifications later in the examination.

SD/11 has been provided separately as two documents (Appendices Q29a and Q29b).

Relevant National Planning Policy Framework

The current version of the National Planning Policy Framework was published on 12 December 2024. Transitional arrangements apply where plans meet the exceptions set out in paragraph 234 of the Framework. In such cases a plan will be examined under the relevant previous version of the Framework. We need to confirm which version of the Framework the Plan will be examined against.

Q30 Do the transitional arrangements set out in paragraph 234 of the December 2024 version of the Framework apply to the Plan? Which criterion/criteria is/are applicable? Can the Councils demonstrate how those arrangements are met?

Paragraph 234 a. and footnote 83 of the 2024 NPPF are relevant to the GNSP and state:

234. For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply:

a. the plan has reached Regulation 19⁸² (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need⁸³;

Footnote 83 states: Calculated using the standard method in national planning practice guidance, published on 12 December 2024.

The GNSP reached Regulation 19 (pre-submission stage) on 12 March 2025.

The GNSP draft housing requirement (i.e. GNSP Housing Target) meets at least 80% of local housing need calculated using the standard method in national planning practice guidance, published on 12 December 2024. The following table from the Housing Background Paper 2025 ([HO/3](#)) (Section 4 Table 3) sets out the draft housing targets as a percentage of the standard method published on 12 December 2024:

Table 3: Compliance with 2024 NPPF Transitional Arrangements

	2024 Standard Method Housing Need	Housing Target	Housing Target minus Housing Need (2023-2041)	Housing Target as percentage of Housing Need
	2023-2041	2023-2041		
Broxtowe Borough	11,175	8,950	-2,225	80%
Nottingham City	22,451	26,690	4,239	119%
Rushcliffe Borough	14,946	11,960	-2,986	80%
Strategic Plan area	48,572	47,600	-972	98%

Q31 If the transitional arrangements do apply, what do the Councils consider to be the relevant previous version of the Framework for the purposes of the examination?

If the transitional arrangements apply the relevant version of the Framework is that published in December 2023.

Plan period

The Framework requires strategic policies to look ahead over a minimum 15 - year period from adoption. With the current plan period of 2023 -2041 that will almost certainly not be achieved for the submission Plan.

Q32 Have the Councils given consideration to extending the plan period to achieve a minimum 15-year period from adoption? If so, where is that consideration set out?

The Councils have not given formal consideration to extending the Plan period beyond 2041.

However, they believe there are good reasons to not do so, as extending the period would entail significant delay to the Plan's adoption. It is likely that further land supply would be required to meet development needs, further SA and evidence base work would also be required.

As set out in section 2 of the Housing Background Paper Addendum 2025 ([HO/2](#)), the Councils wish to have an adopted Local Plan in place as quickly as possible. This is for a number of reasons.

- 1 To provide an up to date policy approach as the Aligned Core Strategies are significantly out of date.
- 2 To provide a planning framework whilst Local Government Review beds down and new local plans on new geographies are prepared.
- 3 To bridge the gap until a Sustainable Development Strategy is in place.

In view of 2 and 3 above, it is recognised that the GNSP will have a limited lifespan and will be replaced relatively quickly by new local plans prepared under the new planning system. This will mitigate any negative consequences of having a plan period of less than 15 years.

Significant delays to the adoption of the GNSP will jeopardise these aims, and the councils have demonstrated their commitment to prepare new plans under the new system by applying for "New System Plan Funding". If successful the councils will publish a notice of intent to prepare a local plan in June 2026, and pass through gateway 1 self assessment by end of October 2026.

Strategic and non -strategic sites and policies

Q33 Are all the policies in the Plan strategic policies?

Yes – all policies within the GNSP are considered to be strategic.

Q34 What is the definition of a strategic site? Does that need to be clarified in the glossary?

The GNSP does not include a definition of a strategic site. However a suggested “Other modification” to the GNSP does include a definition of the GNSP allocated sites (in the Suggested Main Modifications and Other Modifications to the Greater Nottingham Strategic Plan November 2025 document ([SD/11](#))). This is quoted in bold and underlined below:

1.1.11 The main proposals of the Strategic Plan are illustrated on the Key Diagram, which can be found at the end of the document. **Most of the allocated sites are carried forward from the Aligned Core Strategies adopted in 2014. Due to the nature of the Strategic Plan, smaller development sites are not included. The newly allocated sites are capable of accommodating at least 500 dwellings with a minimum size of 5ha, or accommodating 20,000 sq. m employment (or be a minimum of 25 hectares for strategic logistics sites).**

Further clarity could be achieved through a change to this suggested “other modification” along the lines of “the newly allocated **strategic** sites...”

This could be supported by a new glossary entry:

Strategic Allocation: a site allocated in this Strategic Plan capable of accommodating at least 500 dwellings with a minimum size of 5ha, or accommodating 20,000 sq. m of employment development (or be a minimum of 25 hectares for strategic logistics sites).

Housing requirement and capacity

Q35 The Plan contains housing requirements (targets) both individually and collectively for the 3 Councils. What is the rationale for having individual housing requirements? How does that accord with a joint strategic plan?

The approval and implementation of the GNSP is separate across the three authorities. There is no formal joint committee under section 29 of the Planning and Compulsory Purchase Act 2004 with powers to adopt policy requirements covering multiple authority areas. Each council is therefore responsible for separately adopting the GNSP, and can only do so insofar as the GNSP applies to its area.

The GNSP follows precedent from the previous Aligned Core Strategy 2014 (Broxtowe, Nottingham City and Gedling) which also contained individual housing targets for each authority and was separately adopted by each council.

Whilst the housing targets are based on individual authority areas, they are in the context of a single vision and strategy, and a consistent single wider policy framework.

It would also be inappropriate to set a single housing target across the three separate planning authorities, as this would make each Council dependent on housing delivery in the others. However, none of the Councils would have the powers to intervene if issues arose with delivery outside their own administrative area. This would not be a reasonable and fair situation to exist for any one of the Councils.

Due to imminent local government reform, it is possible that parts of the GNSP will fall within different new local authority areas. Having a separate housing target for each authority is a prudent measure so that the housing target for the plan area can be disaggregated across each future authority.

Q36 Do the Councils wish us to confirm whether the Plan can demonstrate a 5 -year supply of housing land from the intended date of adoption? If so, how has the 5 -year housing land supply been calculated?

The Councils would welcome confirmation of the Plan's 5 year land supply. Each authority calculates its own housing land supply. The Councils' Joint Methodology Report for Strategic Housing Land Availability Assessments (SHLAA) [HO/6](#) outlines how site deliverability is assessed. Land supply is calculated for each authority using its agreed housing target and sites that have been identified as deliverable and developable under this SHLAA methodology.

The 5-year housing land supply figures for each Council, and a breakdown for how they have been calculated, are provided in Appendix Q36/Q37. The figures cover the period 1 April 2025 to 31 March 2030.

To start with, for the two years from 1 April 2023 (the GNSP's base date for housing delivery) to 31 March 2025, it has been assessed whether there has been under housing delivery or over delivery, when comparing the GNSP housing requirement to actual dwelling completions. These dwelling completion figures are taken from latest housing trajectories for each Council, which are at Appendix Q36/37.

In accordance with the Sedgefield approach, any housing undersupply between 2023 and 2025 has been added to the 2025 to 2030 housing requirement. Similarly, any oversupply between 2023 and 2025, has been subtracted from the 2025 to 2030 housing requirement.

In accordance paragraph 78 of the December 2024 NPPF, a 5% buffer has then been applied to the 2025 to 2030 housing requirement, rather than the higher 20% buffer. The 20% buffer would only be applied if there had been significant under delivery of housing over the previous three years, which is not the case.

The projected housing supply on 'specific deliverable sites' for the period 2025 to 2030 has been taken from the latest housing trajectories for each Council, which are at Appendix Q36/37.

The resultant 5 year housing land supply calculations, using these inputs, are as follows:

Broxtowe: 6.28 years

Nottingham City: 6.64 years

Rushcliffe: 8.40 years

Q37 Are the Councils requesting that the housing trajectories appended in the Plan are replaced by those contained in section 8 of the Housing Background Paper Addendum (HO/2)? If so, can the Councils clarify the source of the information used to derive the data, in particular the completions on non-allocated sites, Local Plan Part 2 sites and windfall figures?

The housing trajectories set out in Section 8 of the Housing Background Paper Addendum ([HO/2](#)) have now been superseded by more up-to-date trajectories prepared by the Councils using more recent monitoring data. These updated trajectories, provided at Appendix Q36/37, show actual completions for 2023 to 2025 and projected completions for 2025 to 2041. It would be more logical for

these updated trajectories to replace those currently appended to the Plan, and the Councils request that this substitution is made.

“Completions on Non-Allocated Sites and SHLAA Capacity”, as shown within the trajectories, comprises known sites identified within the authorities’ 2024 Strategic Housing Land Availability Assessments that are considered deliverable and developable but are not subject to an existing or proposed allocation. Many of these have planning permission.

For Rushcliffe, a breakdown of sites contributing to this capacity is detailed in the SHLAA Report (2024) at section 2 “Site Assessment Results” ([HO/14](#)). A breakdown of sites contributing to this capacity in Broxtowe is also detailed in their SHLAA Report (2023/24) at section 6 “Housing Site Assessment Results” ([HO/12](#)). A breakdown of sites contributing to this capacity for Nottingham City can be found in the deliverable and developable tables in both the SHLAA 2025 ([HO/13](#)) and Housing Land Availability Report 2025 ([HO/15](#)).

Capacity from sites allocated in Part 2 Local Plans has been carried over. A breakdown of Local Plan Part 2 sites for each Council is provided at Appendix Q36/37.

Evidence supporting the Councils’ approach for calculating windfall figures is provided at section 3 (page 21) of the Joint Methodology for Strategic Housing Land Availability Assessments (2023) ([HO/6](#)), at its Appendix [A](#) for Broxtowe Borough, Appendix [D](#) for Nottingham City and Appendix [E](#) for Rushcliffe Borough.

Q38 Has the additional evidence submitted in the Housing Background Paper Addendum (HO/3) been subject to consultation? What base data is the windfall analysis derived from and is it publicly available? Does it include all sizes of unallocated housing sites?

The Housing Background Paper Addendum 2025 ([HO/2](#)) was prepared following the Regulation 19 consultation to address some of the representations made. It has not been subject to consultation.

Windfall figures for Broxtowe, Rushcliffe and Nottingham City are based on 10-year averages of completions on windfall sites within their local authority areas, the calculations themselves being in Appendices [A](#) , [D](#) and [E](#) of the of the Joint Methodology Report for Strategic Housing Land Availability Assessments ([HO/6](#)). This is set out at paragraph 46 of the methodology (2023) ([HO/6](#)).

Nottingham City’s calculation (located at Appendix [D](#) of the methodology) specifically considered a significant supply of developments under 5 dwellings and developments not requiring planning permission over the first three of the

ten years. The more detailed analysis included in the Housing Background Paper Addendum 2025 ([HO/2](#)) (section 6) is based on the past 5 years of windfall data.

All sizes of unallocated sites are included in each Council's windfall calculations. The only exception is in Rushcliffe, where certain large greenfield "windfall" sites located outside settlements have been excluded.

These exclusions relate to large greenfield sites outside settlements that received planning permission only because Rushcliffe was unable to demonstrate a five-year housing land supply at the time. Such permissions arose from specific circumstances that are not expected to apply in future, given the expectation that a five-year supply will now be maintained. Such sites therefore cannot reasonably be assumed to contribute to future windfall supply. The exclusions also include other large greenfield sites outside settlements that were approved only because they contributed to meeting the minimum housing target set for a particular settlement in the Rushcliffe Local Plan Part 1: Core Strategy. Again, these approvals resulted from policy conditions that no longer apply, and as such these types of sites should not be considered part of future windfall potential. (There were no comparable completions on such sites in Broxtowe or Nottingham City.)

Employment land

Q39 The Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study (EM5) assessed several scenarios for modelling future employment change for the period 2018 to 2038. The job forecasts for the HMA and Plan area are shown in Table 1 and Table 1(a) of the Employment Background Paper (March 2025) (EM2). One of those scenarios modelled 'Labour supply Standard Method with affordability uplift'. Please clarify the housing number used to model this scenario and whether it incorporates the 35% urban uplift.

The housing numbers used are set out in table 8.13 of the Employment Land Study (ELS) ([EM/5](#)). They equate to the standard method applicable at the time and cover the whole HMA. They are as follows:

Broxtowe	368 dpa
Erewash	392 dpa
Gedling	485 dpa
Nottingham City	1,551 dpa
Rushcliffe	604 dpa
Total	3,373 dpa

The figure for Nottingham City includes the 35% uplift which was introduced in Dec 2020.

Q40 Please confirm the quantitative need for office space and industrial and warehousing land (not including strategic distribution and logistics) for the Plan area over the Plan period.

The quantitative need for the Plan area is set out in the Employment Background Paper 2025 (EBP) ([EM/2](#)), and also referred to in the justification text for Policy 5. They are as follows:

Industrial and Warehousing need 2023-41 (EBP Table 4)
96 hectares

Office need 2023-41 (EBP Table 5)
262,000 square metres

Q41 Have the jobs scenarios modelled in the Employment Land Needs Study (EM5) been subject to Sustainability Appraisal (SA)?

The jobs scenarios modelled in the Employment Land Needs Study (EM5) have not been subjected to Sustainability Appraisal, although a range of alternative scenarios in relation to employment have been tested as set out in Table 14: Summary of Policy 5's Reasonable Alternatives (page 94) within the SA Main Report ([SD/5](#)). It is therefore considered that sufficient testing by way of the Sustainability Appraisal has occurred in order to support and justify the selection of policy and site options.

Q42 Appendix 1 of the Employment Land Background Paper (EM2) identifies the supply of employment land and office floorspace making up the employment space supply for each Council. Please provide a table identifying the planning status of each site.

Please see table below:

BROXTOWE BOROUGH	
Manufacturing and Warehousing	Planning Status

Toton	No planning application or permission for manufacturing or warehousing.
Former Bennerley Coal Disposal Site	Current applications: 25/00925/OUT (B8, B2, E(g)(iii)) and 25/00936/FUL (Country Park).
Various Planning Permissions	Various small sites with permission. (Details could be provided if required.)
Office Floorspace	Planning Status
Toton	No planning application or permission for offices.
Chetwynd Barracks	No planning application or permission for offices.
Various Planning Permissions	Various small sites with permission. (Details could be provided if required.)
NOTTINGHAM CITY	
Manufacturing and Warehousing	Planning Status
Blenheim Lane (SR02)	Complete
Stanton Tip Hempshill Vale	No Planning Permission NB suggested Main Modification to remove from GNSP.
Boots	Planning permission PP ref 14/02038/POUT

Hucknall Road / Southglade Road - Southglade Food Park	No Planning Permission
Office Floorspace	Planning Status
Blenheim Lane (SR02)	Complete
Boots	Planning permission PP ref 14/02038/POUT
Thane Road - Horizon Factory	Complete (NB as part of strategic distribution development, note not included in office supply assumptions)
Canal Quarter - Island Site	Planning Permission PP ref 18/01354/POUT PP ref 22/02387/PFUL3
NG2 West - Enterprise Way (SR41)	Outline Planning Permission PP ref 01/01674/POUT.
NG2 South – Queens Drive	Outline Planning Permission PP ref 01/01674/POUT.
University Boulevard - Nottingham Science and Technology Park (SR43)	Local Plan Part 2 allocation (non strategic). No Planning Permission
Broad Marsh (SR58)	Part under construction (NHS Diagnostic Centre) PP ref 24/00171/PFUL3 Remainder no planning permission.
Royal Quarter - Burton Street, Guildhall, Police Station and Fire Station (SR53)	Planning Permission PP ref 25/01609/PFUL3 NB No office content in final scheme

Canal Quarter - Sheriffs Way, Sovereign House (SR62)	PP ref 18/02277/POUT Phase 1 complete (Sovereign House) Phase 2 not commenced. Ref 22/00083/PRES4
Canal Quarter - Arkwright Street East (SR65)	Local Plan Part 2 allocation (non strategic). No Planning Permission 19/00659/NFUL3 (LAPSED)
Waterside - London Road, Former Hartwells (SR67)	Local Plan Part 2 allocation (non strategic). No Planning Permission
RUSHCLIFFE	
Manufacturing and Warehousing	Planning Status
Ratcliffe on Soar Power Station	Local Development Order granted (reference 22/01339/LDO). A number of discharge of conditions are under consideration. Amendment to Local Development Order under consideration to allow data centres on the southern part of the site, and amendments to existing conditions to make conditions and requirements clearer (25/02015/LDO). The LDO due a potentially more comprehensive review on its third anniversary (July 2026).
RAF Newton	Roll forward of Core Strategy strategic allocation. Planning permission granted under reference 22/01468/REM. Certificate of Lawfulness granted confirming commencement of development.
Land North of Bingham	Roll forward of Core Strategy strategic allocation for mixed use development. Outline planning permission granted

	under 10/01962/OUT. Reserved matters under consideration for drainage and infrastructure to facilitate employment development under consideration (reference 25/01491/REM)
East of Gamston	Roll forward of Core Strategy strategic allocation. Outline and hybrid Planning applications under consideration for approximately 2/3 of the mixed-use site under consideration (non-employment land development). No application under consideration for the employment element.
South of Clifton	Outline planning permission granted for mixed use development. Reserved matters approved on a significant proportion of the employment element which are either under construction or completed
Chapel Lane West	Local Plan Part 2 allocation (non strategic). No extant planning permission
Former Bunny Brickworks	Local Plan Part 2 allocation. Extant planning permission granted in May 2024 for mixed use development (planning reference 21/02109/OUT)
Former Cotgrave Colliery	Allocation being rolled forward in the strategic plan. Had outline planning permission for mixed use development which has now expired for the small area of employment land remaining.
South East of Platt Lane	Local Plan Part 2 allocation. Outline planning permission lapsed.

Nottingham Road	Local Plan Part 2 allocation. Outline planning permission for mixed use development granted. Residential element granted reserved matters and is now under construction
Office Floorspace	Planning Status
East of Gamston	Roll forward of Core Strategy strategic allocation. Outline and hybrid Planning applications under consideration for approximately 2/3 of the mixed-use site under consideration (non-employment land development). No application under consideration for the employment element.
RAF Newton	Roll forward of Core Strategy strategic allocation. No extant planning permission for the office element
Land South of Clifton	Outline planning permission granted for mixed use development. Reserved matters approved on a significant proportion of the employment element which are either under construction or completed
Ratcliffe on Soar Power Station*	Local Development Order granted (reference 22/01339/LDO). A number of discharge of conditions under consideration. Amendment to Local Development Order under consideration to allow data centres on the southern part of the site, and amendments to existing conditions to

	make conditions and requirements clearer (25/02015/LDO).
Chapel Lane East	Completed 23-24
Barrington House Leake Road	Planning permission expired
JIT Logistics	Extant full planning permission 22/00623/FUL
MHR Britannia House	Completed 23-24

Q43 The Strategic Logistics Position Paper dated November 2025 (EM1) indicates that the supply of strategic logistics land has been reassessed following the March 2025 Publication Draft Plan. Table 1 of EM1 sets out the assumed supply of sites within the Core and Outer Nottingham HMA (the study area). Table 2 of EM1 shows the residual demand, taking account of the supply in Table 1. Why does the estimated supply differ in Tables 1 and 2? Please confirm the estimated supply and residual demand.

(a) Why does the estimated supply differ in Tables 1 and 2

There is a spreadsheet error in Table 1 of [EM1](#) which updates the table in the Employment Background Paper 2025. The figure quoted of 861,653 sqm is incorrect. The supply totals 842,459 sqm, which is correctly referred to in table 2.

(But note that the updated tables referred to below include further changes: the potential level of floorspace on Stanton Park, Erewash, is slightly increased to reflect the developer's published Masterplan, while East of Lowmoor Road, Ashfield is excluded as it is below the threshold to be considered strategic.)

(b) Please confirm the estimated supply and residual demand.

A new suite of tables has been prepared to confirm the estimated supply and residual demand as of March 2026, which incorporates further up-to-date information provided by the relevant District Councils on planning status and timing (where known) collected to inform Q44. (See Appendix Q44b). Any changes to floorspace are shown in red in these tables.

However, it should be noted that the purpose of the tables is to give an indication of the very significant scale of potential strategic logistics development within and close to the Study area, it is not intended to be a definitive statement of supply, as the mix of uses, particularly on sites granted outline consent for B8 together with B2, E (ii) and (iii) cannot be determined until development occurs. In addition, figures for supply close to the Study area are included for context only, as there is no cross-boundary agreement with these councils to meet needs attributed to the Study area.

The tables provided differ from those provided in Strategic Logistics Position Paper dated November 2025 (EM/1), as an approach to calculating remaining demand has been taken which places less emphasis on the Logistics Study's (EM/4) assumption that 10% to 20% of supply could be met through redevelopment of existing employment sites. Instead of subtracting a 10% or 20% assumption of new supply from residual demand before accounting for new supply (i.e. supply not included in the Logistics Study), the new supply is subtracted from residual demand and then a 10% or 20% assumption is applied to calculate remaining demand. Overall this leads to slightly higher remaining demand compared to the previous methodology, but note this is offset in the tables by the identification of a new site (Land east and south of Newlink Business Park, Newark and Sherwood) and other amendments to supply figures as set out in Appendix Q44a. The tables now focus on square metres, rather than including hectarages, as sites have varying plot ratios, making the hectare figures difficult to interpret.

Using the updated tables 2 and 4 from the new suit of tables at Appendix Q44b, estimated supply, residual demand and remaining demand is as follows:

Table 2: Residual Need (Updates EBP Appendix 2 Table 2)

	Floorspace sq. m
Iceni assessment	1,486,000
Estimated supply (Table 1)	844,460
GNSP allocation: Bennerley Former Coal Disposal Site	130,000
Residual demand	511,540
Assume 10% redevelopment	51,154
Assume 20% redevelopment	102,308
Remaining demand with 10% redevelopment	460,386
Remaining demand with 20% redevelopment	409,232

Table 4: Residual Need (includes potential supply from Table 3)

	Floorspace sq. m
Iceni assessment	1,486,000
Estimated supply (Table 1)	844,460
GNSP allocation: Bennerley Former Coal Disposal Site	130,000
Potential further supply from study area (Table 3)	271,684
Residual demand	239,856
Assume 10% redevelopment	23,986
Assume 20% redevelopment	47,971
Remaining demand with 10% redevelopment	215,870
Remaining demand with 20% redevelopment	191,885

Q44 Table 1 of EM1 sets out the assumed supply of sites within the Core and Outer Nottingham HMA (the study area). Table 3 of EM1 sets out 'Additional potential supply within the study area (not included in EM2)'. Table 5 of EM1 shows 'Additional potential supply not in study area but in theory capable of contributing towards meeting need (not included in EBP)'. What is the assumed timing and phasing of delivery of the sites identified in Tables 1, 3, 5 and 7 of EM1, and where is the evidence to support the timings set out? Please confirm the residual demand taking into account the sites identified in Tables 1, 3, 5 and 7.

An updated table of sites has been provided as Appendix Q44a which includes March 2026 updates on their planning status and development timing (where known) from the relevant local authorities. The final column shows the updated information. Other changes to the table are shown in red text.

As for Q43, the purpose of the table is to give an indication of the significant scale of potential strategic logistics development within and close to the Study area, it is not intended to be a definitive statement of supply, as the mix of uses, particularly on sites granted outline consent for B8 together with B2, E (ii) and (iii) cannot be determined until development occurs. In addition, figures for supply close to the Study area are included for context only, as there is no cross boundary agreement with these councils to meet needs attributed to the Study area.

Residual demand taking into account Tables 1 and 3 of Appendix Q44b are set out in response to Q43.

As there is no agreement with neighbouring authorities to meet unmet logistics need arising within the Logistics Study area, tables showing residual demand including supply from outside the Logistics Study area have not been updated.

Q45 Has any site specific technical or viability work in relation to rail connection been undertaken to support the proposed strategic distribution allocations?

With regard to the Bennerley allocation (policy 22), site-specific technical or viability work in relation specifically to rail connection has not been undertaken. However, the Viability Study ([IN/5](#)) assesses the site (at paragraphs 8.83-8.99) and takes account, in general terms (paragraphs 8.85 and 8.91), of the provision of a rail connection in order to realise an opportunity to deliver a lower carbon distribution and logistics development.

Paragraph 3.22.4 of the Plan emphasises the importance of modal shift to low carbon transportation, and paragraph 3.22.6 explains that this is an important reason why Bennerley is considered preferable to other Green Belt sites. The fact that the site is adjacent to the railway provides the potential for rail access and therefore for the development to make an important contribution to carbon reduction. This does not apply to other options in the vicinity. The commercial attractiveness of rail access may vary, in the short term, with changes in government policy, economic conditions and the relative prices of various kinds of fuel; the Plan is seeking to ensure long-term benefits in reducing carbon emissions.

Whilst the councils are not aware of any specific testing in relation to a rail connection at Ratcliffe on Soar Power Station, the councils can confirm that the rail connection already exists and was in use as recently as June 2024. In terms of overall viability, paragraphs 8.101-8.109 of the Viability Study ([IN/5](#)) provides commentary in relation to the site overall. Specifically, paragraph 8.109 states that, the delivery of non-residential uses cannot be captured in a standard viability appraisal because they are specific to individual occupier businesses and individual sites. However, the site promoter is confident that that this site has strong commercial advantages over alternative sites and therefore development will come forward. This is because the Ratcliffe on Soar Power Station Site benefits from the LDO being in place to help reduce the resources required for planning, and there will be Freeport fiscal incentives for occupiers.

The Local Development Order for the site identifies through its parameters plan (Appendix Q71(B), page 9 of the PDF) the retention of the rail link into the site. In addition, the Design Guide for the LDO (Appendix Q71(C) page 15, Design Principle T6) requires the site development to maximise benefit and strategic advantage of the existing site rail infrastructure.

Q46 Paragraph 4.5 of HO2 says that ‘Annualising the figures to account for the different ELS and GNSP periods gives a labour supply of 2,584.9 per annum, or 46,528 for the GNSP period.’ Paragraph 4.7 goes on to say ‘The difference between the GNSP job target of 46,900 and the derived labour supply of 48,552 is just 3.5%, and well within the tolerance of an Employment Land Study projection. Taking into account the proposed deletion of Stanton Tip strategic allocation, the derived labour supply is 48,042, a difference of just 2.4%.’ Where does the figure 48,552 come from?

Table 1 of the Housing Background Paper Addendum 2025 ([HO/2](#)) sets out the calculation. The purpose is to compare the GNSP housing provision with jobs growth, to demonstrate to what extent they are consistent. ELS is used to determine the number of new jobs per home, which is then applied to the GNSP housing target. As the ELS and the GNSP cover different periods, it is necessary to annualise the ELS figures.

The figure 48,552 is derived as follows:

- 1 The Employment Land Study (ELS) ([EM/5](#)) is used to calculate the number of jobs likely to be generated by new homes.
- 2 ELS used a figure of 2,523 new homes per annum (ELS Table 8.13:– dpa for Broxtowe, Nottingham and Rushcliffe, $368+1,551+604 = 2,523$).
- 3 ELS Table 8.13 also shows “Estimated Net Job Growth 2018-38”. For the 3 authorities this totals 51,705.
- 4 Dividing 51,705 by 20 gives an annualised “Estimated Net Job Growth” figure of 2,585.
- 5 This annualised “Estimated Net Job Growth” figure is divided by the number of new homes to give a jobs per home figure ($2,585/2,523 = 1.02$).
- 6 The jobs per home figure is applied to the GNSP housing target of 47,600, giving the “derived labour supply of 48,552” ($47,600 \times 1.02 = 48,552$). NB The 1.02 rounded figure is used in the calculation, rather than using the unrounded figure.

Q47 Part 2 of the policy refers to ‘allocating land specifically to meet the needs of high technology users.’ Which land / allocation does this mean?

Part 2 of Policy 5 is worded to ensure local plan making takes account of the need of high technology users and allocates suitable land where appropriate. As the Policy is similar to policies in the existing Core Strategies, which informed the current round of Part 2 Local Plans, several currently allocated sites or GNSP site allocations are considered to meet the needs of high technology uses and include:

Broxtowe Borough

Boots (GNSP Strategic Allocation 19)

Toton and Chetwynd Barracks (GNSP Strategic Allocation 21)

Nottingham City

Boots (GNSP Strategic Allocation 19)

Nottingham Science and Technology Park (Part 2 Local Plan allocation SR43)

The Island Site (Part 2 Local Plan allocation SR59)

Rushcliffe Borough

South of Clifton (GNSP Strategic Allocation 30)

East of Gamston/North of Tollerton (GNSP Strategic Allocation 31)

Former Ratcliffe on Soar Power Station (GNSP Strategic Allocation 32)

Nottingham City Centre and other centres

Q48 What scale and type of town centre development (leisure, retail, office and other main town centre uses) is likely to be required over at least the next ten years and where is this evidenced? What strategy does the Plan set out to meet this need and where is this set out?

Nexus consultants were commissioned to undertake the Greater Nottingham Centres Study 2024 ([TC/1](#)). The Study provides qualitative strategic direction for the next decade and beyond, based on market trends, centre performance and socio-demographic analysis. Crucially it identifies that the centres within Greater Nottingham are performing relatively well.

Over the next ten years, the Centres Study identifies no requirement for significant new comparison retail floorspace, as demand has fallen due to online shopping and the withdrawal of several national multiples.

Instead, the priority is to maintain strong convenience provision, particularly foodstores that underpin footfall and to encourage independent and specialist retail, supported by more flexible, experiential formats. This reflects the wider shift away from traditional retail-led centres toward more diverse and resilient high streets.

The Centres Study (Policy Recommendations) identifies as a key priority the reuse of existing stock, the repurposing of important town centre assets to provide active uses such as leisure, community and residential uses, and wider aesthetic improvements to encourage safe pedestrian movement and promote pleasant town centre environments. It does not identify quantitative targets for main town centre uses (although the Employment Land Study addresses office need), instead recommending consolidation and reconfiguration of existing floorspace to respond to market demand.

Town centres in the Plan area are expected to accommodate substantial growth in leisure, food and drink, and experiential uses, which the Study identifies as critical for attracting visitors and increasing dwell time. As retail demand continues to contract thus freeing up existing floorspace, these uses will form the main driver of future activity and centre vitality, including reinforcing the evening economy through a wider mix of hospitality and cultural spaces.

In terms of Office development, Policy 6 sets out that the City Centre is the key location for offices in the Plan area and Policy 7 goes on to highlight the role that offices and workspaces play in creating diverse centres. In addition, the Plan encourages flexible and hybrid workspace formats. The Broadmarsh proposals represent the most significant single intervention in the Plan area, with 46,000m² of new commercial and office floorspace forming part of a major regeneration programme that will shape City Centre provision over the next decade.

The Study places strong emphasis on clustering public services and civic uses within town centres to support footfall, reduce vacancy, and create more multi-functional environments. This includes health facilities, libraries, learning spaces, community hubs and cultural venues. The success of recent City Centre investments such as the new Central Library, Nottingham College City Hub and NHS Diagnostic Centre illustrate how these uses can anchor regeneration and strengthen centre roles. This approach is set out in Policy 12: Local Services and Healthy Lifestyles.

A significant increase in town-centre residential development is highlighted as essential to supporting long-term vitality and creating sustainable, mixed-use places. This includes new homes in regeneration areas, such as the 1,000 homes proposed at Broad Marsh, as well as upper-floor conversions and residential components in mixed-use schemes. More people living in and

around centres will help reinforce the day and evening-economy offer and improve the viability of local services.

The GNSP sets out a place-based, policy-led strategy for meeting future town-centre needs. It does this through two core strategic policies: Policy 6 (Nottingham City Centre) and Policy 7 (Role of Town and Other Centres), supported by the Spatial Vision, Spatial Objectives, and mixed-use strategic allocations such as Broad Marsh. Other Policies, such as Policy 12: Local Services and Healthy Lifestyles support this approach.

Policy 6 addresses the City centre, and sections provides a) to e) provide a comprehensive strategy to allow the City centre to adopt to changing trends impacting on centres.

Policy 7 sets out the hierarchy and network of centres which serve the GNSP area. Parts 3 and 4 of the Policy seek to ensure new residential development does not undermine the vitality and viability of the centres, and identifies those centres which are considered to be underperforming and therefore in need of enhancement the details of which are to be set out in future plan-making.

Part 5 responds to the evidence base, seeking to maintain and enhance vitality and viability of centres in accordance with their position in the hierarchy. It seeks to widen the range of uses, enhance the environment and accessibility of centres, and encourages office development appropriate to each level of the hierarchy. Part 6 supports vitality and viability by seeking to control out of centre development where planning permission is required, importantly through an evidence based approach to impact assessment thresholds.

Taken together, these policies set out a coherent approach to centres focusing on mixed-use development, experiential/leisure growth, flexible workspace, increased levels of residential development, public service clustering, and encouraging centre distinctiveness, all directly addressing the needs identified in the Centres Study.

Q49 Policy 6.1.b.ii of the Plan refers to ‘ensuring the development needs of science, technology and creative industries are provided for’. What are the needs for this sector and where in the evidence is this set out?

Science, technology and creative industries are priority sectors in the Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP), and are reflected in the growth sectors used in the Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study (May 2021) ([EM/5](#)) to derive the Regeneration scenario, which is the scenario used in the GNSP. (See table 8.9 of the Employment Land Study, which includes Life Sciences, Creative &

Digital, Professional and Business Services and Health and Social Care amongst the LEP SEP target growth sectors).

The needs of these sectors are therefore included in the office and employment needs identified by the Employment Land Study and provided for by the GNSP. Of most relevance to Policy 6: Nottingham City Centre is an emphasis on creative industries, research and development, biosciences and health and social care. There is a significant cluster of creative industries centred in and around the Trent University Confetti College in the City centre Creative Quarter, whilst BioCity on Pennyfoot Street is a significant Life Sciences cluster, with potential to expand onto the Island Site (Local Plan Part 2 allocation SR59). The Community Diagnostic Centre being constructed at the Broad Marsh allocation is a significant health facility.

See also Q47 which references high technology users.

In addition, Nottingham's Economic Growth Plan 2024–2030 followed the LEP SEP. It identifies the science, technology and creative industries as central to the city's future prosperity, emphasising the need for a stronger skills pipeline in digital, STEM and creative fields, deeper innovation and business support to help startups grow, and enhanced infrastructure including specialist workspaces, world-class digital connectivity and improved transport links. It also highlights the importance of high-quality, innovation-led places such as the Creative Quarter and major regeneration areas to attract talent and investment, and stresses that sustained collaboration between the City Council, universities and industry partners is essential to driving the sector's expansion across Greater Nottingham.

Q50 Policy 6.1.a.ii of the Plan refers to the primary shopping area. Where is this identified?

The Primary Shopping Area is identified in the Nottingham City Local Plan Part 2 Policies Map. This can be viewed here [City Centre master Oct 2020](#) on the City Centre Quarters, Primary Shopping Area and Primary Shopping Frontages Inset Map.

Q51 In accordance with the Framework, does the Plan explain the role and function of each tier in the centre hierarchy and where is this set out?

Policy 7 of the Greater Nottingham Strategic Plan sets out the hierarchy and network of centres serving the GNSP area. When read in conjunction with the Glossary, which provides further clarification on the role and function of City,

Town, District and Local centres and the role and function of each tier through Policy 7: Role of Town and Other Centres.

Policy 6 defines how Nottingham City Centre operates as the regional hub for higher-order retail, leisure, services and employment. Policy 7, when read in conjunction with the relevant Glossary definitions, defines how the town centres of Beeston, Bulwell and West Bridgford function as main service centres providing a broad mix of shops, services, community facilities and large foodstores; how district centres serve smaller catchments with convenience retail and everyday services; how local centres provide walkable access to essential day-to-day shops and services within neighbourhoods; and how neighbourhood parades act as small clusters of outlets meeting ultra-local needs.

Policy 12: Local Services and Healthy Lifestyles is also relevant in terms of community facilities and the role and function of centres.

Q52 The Policies Map Changes (SD3) indicates that West Bridgford is proposed to change from a District Centre to a Town Centre. Where is the justification for altering its position within the centre hierarchy set out?

The justification for this is provided in the Greater Nottingham Centres Study 2024, located at ([TC/1](#)). Table 8.1 (page 71) of this document “Overarching City and Principal Centre Conclusions” identifies West Bridgford’s provision of national retailers and independents plays an important role in meeting the needs of its residents. It also identifies that the centre draws from a much wider area than a typical district centre e.g. the whole of Rushcliffe Borough and is already acting as a town centre in terms of its position in the hierarchy. The study recommends that West Bridgford is elevated in the hierarchy from a district centre to a town centre at paragraphs 8.36 (page 75) and paragraph 8.64 (page 83).

Q53 Policy 7 indicates that the boundaries of centres are identified in current Part 2 Local Plans and any further changes will be set through future plan preparation. Please could the Council confirm whether the Plan seeks to make any changes to the existing boundaries? Are the boundaries based on up -to-date evidence and where is that evidence set out?

The Councils confirm that they do not wish to make changes to the existing boundaries of the centres and consider that this matter is best undertaken through the preparation of each authority’s subsequent Local Plan, due to the strategic nature of the Greater Nottingham Strategic Plan.

Up to date evidence for boundaries is set out in the Greater Nottingham Centres Study (June 2024) ([TC/1](#)). This study does recommend potential changes to existing centre boundaries (set out in Appendix 8 – Recommended Boundary Maps, which contains suggested updated mapped extents for all centres). Subsequent Local Plans will draw on this evidence as appropriate.

Q54 The Councils' response to a Regulation 19 representation indicates that Policy 15 includes reference to connecting Nottingham City Centre and the urban extensions, including the land East of Gamston/ North of Tollerton. Please could the Council clarify which of the proposed public transport improvements identified in Policy 15 support the Councils' response?

There are a number of public transport improvements identified in Policy 15 which will improve connectivity between Nottingham City Centre and the urban extensions:

- Bus Priority - A60 Nottingham Rail Station to West Bridgford – Improving bus travel times from the City Centre to the south of the City into West Bridgford. This will benefit existing and future bus routes serving land East of Gamston/ North of Tollerton (Policy 31).
- Park and Ride Gamston, at A52 / Radcliffe Road roundabout – Would provide frequent public transport links into the City Centre which can be aligned with public transport improvements associated with the East of Gamston/ North of Tollerton site (Policy 31).
- NET extension Gamston spur – New route being explored to extend the tram network which would serve the edge of the East of Gamston/ North of Tollerton site (Policy 31). There is no existing tram line from the City Centre to this site.
- NET extension Toton - An extension of the existing tram line being explored at Toton to the west into the new development (Policy 21) to provide a future link to Long Eaton and beyond.
- NET extension Clifton to Fairham Pastures - An extension of the Clifton line into Fairham Pastures being explored to serve the South of Clifton development (Policy 30).

Further details of public transport projects are included in the Infrastructure Delivery Plan Addendum ([IN/4](#)) from page 23.

Q55 Is Stapleford identified as a District Centre in the Plan rather than a Town Centre as suggested in the Council's response to the Regulation 19 consultation?

Stapleford is identified as a District Centre in policy 7 of the Plan. The response to ID 1259786 should have clarified that it is designated as a 'District Centre' in the retail hierarchy but this does not imply that Stapleford is not a 'town'.

Q56 Please clarify whether Fairham is an existing local centre? If so, should it be included in the centre hierarchy?

Fairham has no existing local centre. This element of the allocation is yet to be built out. Once it has been built out, consideration will be given to where it would sit in the settlement hierarchy through future plan making.

Gypsies, travellers and travelling showpeople

The PPTS indicates that plans should set pitch targets for gypsies and travellers and plot targets for travelling showpeople based on identified needs and include requirements for both permanent and transit site accommodation over the Plan period.

Q57 Given that the Greater Nottingham and Ashfield District Council Gypsy and Traveller Accommodation Assessment, 2021 (GTAA) covers the period 2020 -2038, please clarify what the identified need is for the plan period and where this is set out?

The justification text to Policy 9: Gypsies, Travellers and Travelling Showpeople identifies a gypsy and traveller pitch requirement between 2020 and 2038 of 1 pitch for Broxtowe, 21 for Nottingham City and 20 for Rushcliffe. It also identifies a travelling showpeople plot requirement of 22 for Nottingham City (the requirement for Broxtowe and Rushcliffe is zero). This identified need for gypsy and traveller pitches and travelling showpeople plots does not cover the whole of the plan period to 2041. However, the GNSP does not seek to meet all identified need, this is expected to be met through further Plan making supported by a new need assessment. The GNSP policy seeks to set a framework for both future plan making and development management decisions, and current assessment is considered adequate for this purpose.

The figures set out come from The Greater Nottingham and Ashfield District Council Gypsy and Traveller Accommodation Assessment ([HO/8](#)). This produced three need figures based on different possible definitions of Gypsies and Travellers. As recommended by the study, the figures arising from the ethnic definition of Gypsy and Traveller have been used to exceed the provision required under the Planning definition of Gypsy and Traveller (PPTS) in the NPPF.

The study recommends updating the evidence on need for Gypsy and Traveller accommodation every 5 to 7 years to account for rapidly changing population size and demographics as well as changes to planning definitions. It is therefore prudent that provision be modulated through site specific allocations in future plans and need in the latter part of the plan period informed by an updated study.

Q58 Has the identified need been translated into pitch and plot targets within the Plan and where is this set out?

Identified need to 2038 has been disaggregated into a pitch requirement for gypsies and travellers and a plot requirement for travelling showpeople. These are set out in the justification below Policy 9: Gypsies, Travellers and Travelling Showpeople. Need for pitches and plots from 2039 onwards will need to be determined by an updated study.

Q59 Paragraph 3.9.5 of the Plan states, 'In accordance with the results of the GTAA, the allocation of sites includes provision on the South of Clifton strategic allocation (see Policy 30) and the East of Gamston / north of Tollerton strategic allocation (see Policy 31). How many pitches are expected to be delivered through these allocations, and over what timescale?'

For the strategic allocation South of Clifton (Fairham), condition 41 of its outline permission (14/01417/OUT) identifies a minimum requirement of 4 pitches. The strategic allocation East of Gamston North of Tollerton will be delivered in accordance with the adopted East of Gamston North of Tollerton Development Framework Supplementary Planning Document, which specifies a requirement for 8 pitches. Neither site has a precise timescale for development, however, the site at Gamston is under ownership of Nottinghamshire County Council, and this should help ensure that delivery can be achieved relatively early in the build out of the allocation. At South of Clifton, development is well-underway, which should hopefully facilitate delivery of the gypsy and traveller pitches relatively soon.

Q60 Taking account of the proposed site allocations Policy 30 and 31, what is the resulting residual need?

Accounting for the minimum gypsy and travellers pitches that are expected on the two sites allocations, the resulting residential need would be for 8 pitches in Rushcliffe, 1 pitch in Broxtowe and 22 in Nottingham City.

Culture, Tourism and Sport

Q61 As well as cultural and tourism facilities, Policy 13 also relates to sports facilities. Has a robust and up-to-date assessment of the need for sport facilities, and opportunities for new provision, as outlined in paragraph 102 of the Framework been prepared? If so, what are the identified needs and opportunities and where is this set out?

A specific assessment has not been prepared for the Strategic Plan. As indicated in part 1 of policy 13, details will be set out through future plan preparation as appropriate, and these details will be based on up-to-date assessments of needs and opportunities.

Information is however available on Rushcliffe's website regarding their [Playing Pitch Strategy](#) and [Leisure Facilities Strategy](#). Broxtowe's and the City's Playing Pitch Strategies run to 2028 and are not up-to-date; however, the most recent information about sport facilities is included in section 6 (page 54) of the [Infrastructure Delivery Plan Addendum \(IN/4\)](#). Note an updated link to the City Council's Playing Pitch Strategy 2018 [here](#).

Q62 There is no Council response to IDs 1243424 and 1250404 within the consultation summary table (Appendix 1 to the Consultation Statement) and the Consultation Statement itself. Please could the Councils provide a response to those representations?

Plan Policy/ Topic	Main Issues Raised	Councils' Response	Possible Plan Modification	Response ID
Policy 13: Culture, Tourism and Sport	Nottingham needs to do more to attract more tourists. Nottingham needs more hotels and more attractions to boost tourism to the area and the local economy.	Policy 13 supports the desire to attract more tourists by stating that "major new cultural and tourism facilities of national or regional importance will be located in or adjoining Nottingham City Centre..."	None	1243424
Policy 13: Culture, Tourism and Sport	Policy 13 is supported in principle. Weight should be given to the proximity of new residential development to existing community facilities	Comments noted. Policy 13, part D supports facilities being accessible and therefore close to development. The appropriateness of new residential development is considered in other policies or as part of the site selection process.	None	1250404

Green Belt

Q63 Please provide a plan showing the extent of the existing Green Belt within the Plan area.

A plan has been produced to show the extent of the existing Green Belt and has been provided separately in Appendix Q63.

Q64 The Green Belt Reviews (SS/2a, c and d) rely on assessments carried out between 2013 -2015 under the 2012 version of the Framework. Why are those reviews considered up to date? Are they consistent with one another?

Section 3 of the Green Belt Background Paper ([SS/1](#)), summarised at paragraph 3.14, explains that national policy in relation to Green Belt review remained substantively unchanged since the previous Green Belt reviews were undertaken. Paragraph 6.1 of that document confirms that the requirement for, and broad methodology for undertaking, a review was therefore unchanged. However, as explained in paragraph 6.2, it was concluded that there was a need for further Green Belt review focusing on updating the 'Broad Area' assessments, to inform the preparation of the Strategic Plan. Following the undertaking of this work, the reviews are considered to be up to date.

The Green Belt Review Methodology ([SS/2](#)), summarised at paragraph 2.4, explains that, as part of the Review, a consistency check was carried out to ensure that a consistent methodology has been followed by each Council when carrying out assessments. This is to ensure that a robust and transparent methodology has been followed. It involved the use of agreed assessment criteria and regular meetings between the authorities. The reviews are therefore consistent with one another.

Q65 What exceptional circumstances exist to justify the release of sites in the Green Belt? Were all reasonable options for meeting development needs exhausted first? Was the release of Green Belt informed by discussions with neighbouring authorities?

Three proposed allocations involve the release of sites in the Green Belt. These are at Toton and Chetwynd Barracks (policy 21), the Former Bennerley Coal Disposal Point (policy 22) and the Former Ratcliffe on Soar Power Station (policy 32). The Ratcliffe site is already subject to a Local Development Order (LDO).

The exceptional circumstances to justify the release of sites in the Green Belt are the need to provide additional land for housing, employment and logistics

purposes, as explained in the Housing Background Paper ([HO/3](#)) and Addendum ([HO/2](#)), the Employment Background Paper ([EM/2](#)) and the Strategic Distribution and Logistics Background Paper ([EM3](#)). Explanation of the exceptional circumstances is also provided regarding Toton/Chetwynd at paragraph 3.21.13 (page 169) of the Plan; regarding Bennerley at paragraphs 3.22.6-3.22.7 (pages 175-176) of the Plan; and regarding Ratcliffe at OM63 (page 56) of the Suggested Main Modifications and Other Modifications document ([SD/11](#)).

All reasonable options for meeting development needs were exhausted first. Current Green Belt boundaries are tightly drawn around the built-up areas, and it would not be possible to meet an appropriate proportion of identified needs without the release of some sites in the Green Belt.

The release of Green Belt is informed by discussions with neighbouring authorities, as set out in the Duty to Cooperate Statement ([SD/7](#)) (and subsequent additional Statements of Common Ground). (However, regarding strategic logistics development (which relates to the Bennerley and Ratcliffe allocations), at the time the Statements of Common Ground were prepared there was no current assessment of strategic logistics need in Leicestershire and Amber Valley, so these neighbouring authorities were not in a position to know their own level of need.)

The Green Belt in the Plan area has been reviewed using a clear and consistent methodology, as set out in [SS/2](#) (Green Belt Review Methodology). Details of the review are given in [SS/2a](#), [SS/2c](#) and [SS/2d](#) (the Green Belt Review Appendices for each authority).

Changes to the Green Belt boundary have been proposed taking account of the findings of this review, and section 7 (page 15) of [SS/1](#) (the Green Belt Background Paper) explains how Green Belt issues have been considered through the preparation of the Plan.

The justification text for site allocation policies which involve proposed changes to the Green Belt boundary explain the exceptional circumstances to justify the changes. For example, paragraph 3.22.6 (page 175) of the justification text for policy 22 explains the exceptional circumstances regarding the proposed allocation at the Former Bennerley Coal Disposal Point.

Q66 How were Green Belt sites selected for release? What methodology was used and where is that set out?

Paragraphs 1.5 and 3.4 of the Site Selection Report ([SS/4](#)) advise that protection of the Green Belt has been an important factor in site selection. As explained at paragraphs 3.10-3.12 of [SS/4](#), all options have been assessed in

terms of how well they perform against the purposes of the Green Belt. These assessments have been carried out in accordance with the Green Belt Review Methodology ([SS/2](#)) and details are given in the Green Belt Review documents ([SS/2a](#), [SS/2c](#) and [SS/2d](#)). Section 7 of the Green Belt Background Paper (SS/1) explains how Green Belt issues have been considered through the preparation of the Plan, including (at paragraph 7.3) how the SHLAA Methodology document ([HO/6](#)) treats Green Belt as a key factor. With regard to the Bennerley and Ratcliffe sites, paragraph 44 (pages 17-18) of the Strategic Distribution and Logistics Background Paper ([EM/3](#)) explains that the protection of the Green Belt was considered alongside the conclusions of the Nottingham Core & Outer Logistics Study ([EM/4](#)).

Q67 Does the Plan set out ways in which the removal of land from the Green Belt can be offset through compensatory improvements? If so, where is that set out?

Amongst the site allocations (policies 19-32), three involve the removal of land from the Green Belt.

At Toton and Chetwynd Barracks (policy 21) a relatively small Green Belt release is required, specifically to facilitate a junction to the A52 and a link road, as explained in paragraphs 3.21.11-3.21.13. In these particular circumstances, compensatory improvements would not be provided in the immediate vicinity; however, part 2.G (17-19) of the policy will ensure improvements to Green Infrastructure within land that was previously part of the Green Belt.

Part 2.B (4-6) of policy 22 (Former Bennerley Coal Disposal Point) requires the provision of a Country Park and associated compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Part 2.E.20 of policy 32 (Former Ratcliffe on Soar Power Station) requires the creation and enhancement of green infrastructure which links to the wider green infrastructure network, which has regard to the Greater Nottingham Landscape Character Assessment, and provides for biodiversity enhancements. This will involve remaining Green Belt land, in accordance with NPPF paragraph 147.

Strategic allocations

The majority of strategic allocations appear to have already been allocated in existing plans and/or granted planning permission. We want to understand to what extent the proposed strategic allocations accord with these extant

allocations, and to what extent they differ. For each of the strategic allocations (Policies 19 -32), please:

Q68 Provide plans showing the boundaries of any extant allocations and/or planning permissions compared to those of the proposed allocations

Plans have been provided separately in Appendix Q68.

Q69 Clarify how many dwellings/employment floorspace are provided for under the existing allocations/permission compared to those in the proposed allocations.

A separate schedule has been produced in Appendix Q69/Q70.

Q70 Clarify how many dwellings/employment floorspace have been constructed and how many remain to be delivered, both for extant allocations/permissions and for the proposed allocations where those differ.

A separate schedule has been produced in Appendix Q69/Q70.

Q71 Please provide a copy of the Local Development Order for the strategic allocation on the former Ratcliffe on Soar Power Station (Policy 32).

A copy of the Local Development Order (its main documents) has been provided separately in Appendix Q71 (A to D).

Statement of Consultation and Consultation Summaries

Appendix 1 (SD6a) of the Regulation 22 Statement of Consultation (SD6) contains summaries of the responses received in relation to the Regulation 19 consultation undertaken in 2024 and 2025. Page 1 of Appendix 1 states that 'Responses made in relation to the Regulation 19 consultation undertaken in November 2024 have been added in red.'

Q72 Does the red text summarise only those parts of the 2024 representations that were ‘carried forward’?

No, the red text summarises comments which were submitted as part of the 2024 consultation and not those which were ‘carried forward’.

Comments submitted under the 2025 consultation, which includes where consultees asked for their comments to be ‘carried forward’ are summarised in black text.

Comments ‘carried forward’ are treated as being made under both consultations.

Q73 Page 1 of Appendix 1 states ‘Where the comments repeat points already summarised, the 2024 response ID has been added, or it is shown in the list of respondents.’ Based on this sentence and the table presented, it is unclear how the responses should be interpreted, particularly where there are multiple response IDs in both red and black text and a differing number of respondents. Please clarify.

A number of consultees requested that their comments made in relation to the 2024 consultation were ‘carried forward’ into the 2025 consultation rather than submitting new representations. These comments were summarised as part of the 2025 consultation summaries in black.

Where consultation comments were carried forward, the summaries were not duplicated as part of the 2024 consultation summaries but the response ID for the 2024 response was added in red.

Where consultation comments to the 2024 consultation made the same points already summarised in the consultation summaries, their response ID was added against the relevant summary.

An updated list of consultees has been produced (Appendix Q73) which provides a list of respondents, which consultation they commented on and the response IDs which are listed within the consultation summaries.

Q74 Please confirm whether or not all the responses subject to examination are summarised within Appendix 1?

All responses made in respect of the 2025 Regulation 19, which was the consultation on the Plan which has been submitted for examination ([SD/2](#)), are summarised within Appendix 1 in black text.

Responses made in relation to the 2024 Regulation 19, which was the consultation on the Plan which included Gedling Borough Council ([PC/26](#)), have also been summarised in red text. The exception of this is where they raised points already summarised as part of the 2025 consultation. For these responses, only the response ID is listed in red.

Appendix Q73 clarifies which consultation the respondents commented on.

Monitoring reports

Q75 Does Rushcliffe Borough Council intend to update its monitoring report (AM/3) during the examination?

Yes. Rushcliffe Borough Council have now published the 2024 Local Plan Monitoring Report which will supersede the existing report at [AM/3](#). A copy has been provided. The 2025 Local Plan Monitoring Report for Rushcliffe is being finalised and will shortly be available for the examination.

Superseded or withdrawn policies within adopted local plans

Q76 Have the Councils identified which existing adopted development plan policies will be superseded, replaced or retained on adoption of the Plan? Please provide a schedule identifying which new policies in the Plan replace which existing adopted development plan policies.

A list of replaced policies has been prepared in a separate schedule in Appendix Q76 and lists which existing policies will be replaced by policies within the Plan.

A list of Part 2 Local Plan policies which are to be replaced is also included in Appendix D of the Plan ([SD/2](#)). However, it should be noted that it is now proposed that Nottingham City Local Plan Part Policy RE8: Waterside is retained and this would need to be a modification to the Plan. Appendix Q76 reflects this.

Q77 Please confirm any existing policies intended to be retained as part of the development plan following adoption, and where are these set out.

A separate schedule has been produced in Appendix Q77 to list which policies will be retained/saved as part of the development plan following adoption. These are not currently set out in the Plan.

Q78 What is the purpose of Appendix E? Why does the Plan need to identify extant Supplementary Planning Documents (SPDs)?

The purpose of the list is to clarify that these adopted SPDs also support implementation of certain applicable policies within GNSP. Appendix E of the Plan identifies which policy 'hooks' are contained within the GNSP to justify the continued operation of these SPDs following adoption of the GNSP.

The East of Gamston/North of Tollerton Development Framework SPD was adopted 10 March 2026 and would need adding to Appendix E. Its policy 'hook' within the GNSP is Policy 31: Strategic Allocation East of Gamston/ North of Tollerton (Rushcliffe).

Relationship with local plans and neighbourhood plans

Paragraph 1.1.8 of the Plan states that 'The policies of the Greater Nottingham Strategic Plan have therefore been written in such a way as to address the strategic common issues, and provide a sufficiently flexible framework for future plan preparation, in which Broxtowe Borough, Rushcliffe Borough and Nottingham City Councils will outline their locally distinct approaches to the more detailed delivery of the Strategic Plan.' Several policies refer to future plan preparation.

Q79 Are all three local planning authorities intending to prepare Part 2 local plans consistent with the Plan? How would that accord with the proposed new plan -making framework in the Levelling Up and Regeneration Act 2024 anticipated to commence from December 2026?

During the early preparation of the GNSP it was envisaged that the preparation of Part 2 Local Plans would follow adoption of the GNSP. However, under planning reform this is no longer an option open to the Councils. The Councils now intend to move quickly to prepare new local plans in accordance with the new planning system which will replace the GNSP in due course. To this end, all three authorities have applied for "New System Plan Funding". If successful the councils will publish a notice of intent to prepare a local plan in June 2026, and pass through gateway 1 self assessment by end of October 2026.

Q80 Is the Plan consistent with paragraph 67 of the Framework which requires strategic policies to set out a housing requirement for designated

neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations?

Yes, the plan is consistent with paragraph 67. There is no requirement for further land to be allocated through neighbourhood plans, as the GNSP housing targets are expected to be met by the existing identified supply. This includes the GNSP strategic allocations, existing Local Plan Part 2 allocations, known unallocated sites within settlements (as identified in Strategic Housing Land Availability Assessments), and windfall sites within settlements.

Additionally, neighbourhood plan coverage across the GNSP plan area is very patchy. Most designated neighbourhood areas already have completed neighbourhood plans, and there is no certainty about where and when new neighbourhood plans will be prepared or existing ones reviewed in the future. With government funding for neighbourhood planning having been withdrawn, the likelihood of further neighbourhood plan preparation is expected to be notably more limited. This combination of factors makes neighbourhood plans a problematic and inefficient mechanism for directing development to sustainable locations to help meet the GNSP housing targets.