



Greater Nottingham Strategic Plan Examination

Initial Questions to the Councils (2)

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Examination Webpage: [Greater Nottingham Strategic Plan Examination](#)

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Introduction

This note follows on from our initial question to the Councils dated 2 February 2026. We are grateful to the Councils for confirming that local housing need will be calculated using the 4-step standard method as set out in the 2023 Planning Practice Guidance rather than the 2-step standard method in the 2024 Planning Practice Guidance. However, that does raise questions about the basis for the Greater Nottingham Strategic Plan (the Plan) and the evidence that underpins it. We set out below further initial questions for the Councils. The responses will help us to identify the matters and issues that need to be examined in more detail.

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?**
- Q2 Is the document SD/2 the same as the Regulation 19¹ plan published for consultation between March and April 2025?**
- 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)?**
- Q4 Was the Plan prepared in accordance with the relevant Local Development Schemes adopted by the respective Councils? Do those schemes require updating?**

¹ All references to regulations refer to the Town and Country Planning (Local Planning) (England) Regulations 2012

- 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?
- 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?

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?
- 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?
- 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 any shortfall in housing and employment land, and where is this evidenced?
- Q10** What were the outcomes of the engagement in relation to strategic housing and employment matters, and where is this set out?

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?

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

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

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?

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

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

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?

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 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.
- 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?
- 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?
- 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?
- 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?
- 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?

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’?

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.

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?

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?

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

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.

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 that 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?

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?

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?

Strategic and non-strategic sites and policies

- Q33** Are all the policies in the Plan strategic policies?
- Q34** What is the definition of a strategic site? Does that need to be clarified in the glossary?

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?
- 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?
- 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?
- 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?

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.
- 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.
- Q41** Have the jobs scenarios modelled in the Employment Land Needs Study (EM5) been subject to Sustainability Appraisal (SA)?
- 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 identify the planning status of each site.

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

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

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

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?
- Q58** Has the identified need been translated into pitch and plot targets within the Plan and where is this set out?
- 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?
- Q60** Taking account of the proposed site allocations Policy 30 and 31, what is the resulting residual need?

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?

- 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?

Green Belt

- Q63** Please provide a plan showing the extent of the existing Green Belt within the Plan area.
- 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?
- 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?
- Q66** How were Green Belt sites selected for release? What methodology was used and where is that set out?
- 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?

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
- Q69** Clarify how many dwellings/employment floorspace are provided for under the existing allocations/permission compared to those in the proposed allocations.
- 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.
- Q71** Please provide a copy of the Local Development Order for the strategic allocation on the former Ratcliffe on Soar Power Station (Policy 32).

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

Monitoring reports

- Q75 Does Rushcliffe Borough Council intend to update its monitoring report (AM/3) during 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.**
- Q77 Please confirm any existing policies intended to be retained as part of the development plan following adoption, and where are these set out.**
- Q78 What is the purpose of Appendix E? Why does the Plan need to identify extant Supplementary Planning Documents (SPDs)?**

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?

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?

Next Steps

We are not at this stage seeking views from anyone other than the Council. Following receipt of answers to our initial questions we expect to circulate a Matters, Issues and Questions paper, identifying the points on which we wish to hear further evidence. Those who made representations at the Regulation 19 stage will be informed of that paper and the date and time of any hearing sessions. A guidance note will accompany the paper providing advice on how the Council and representors may participate either in writing, or in person, at a hearing.

We would be grateful for a response by 20 March 2026. If you require more time, please advise the programme officer.

G Davies, U P Han and F Bradley

INSPECTORS