



Greater Nottingham Strategic Plan Examination July 2026

**Matters, Issues and Questions
identified by the Inspectors**

**Matter 5:
Strategic Allocations**

Response to the Inspectors' Matters, Issues and Questions

This document is the response of Broxtowe Borough Council, Nottingham City Council and Rushcliffe Borough Council to the Matters, Issues and Questions (MIQs) identified for examination by Planning Inspectors G Davies BSc (Hons) DipTP MRTPI, U P Han BSc (Hons) DipTP MRTPI and F Bradley BRP (NZ) MRTPI as published on the 21st May 2026.

Each response paper includes a number of references to specific evidence which has been relied upon in answering the MIQs. These reference numbers (shown as **XXXX** or **[XXXX]**) relate directly to the Examination Library website, where all evidence is published:

www.localplanservices.co.uk/gnspexamination

The Inspectors' questions are shown below in bold. The Councils' responses are shown in normal typeface below the Inspectors' questions.

Proposed Modifications arising from the Inspectors' MIQs are set out in grey tint boxes.

Matter 5: Strategic Allocations

Issue 1: Developer contributions – Policy 18

Q80 Does the policy identify sufficient mechanisms and procedures to ensure its effectiveness?

Policy 18 refers to developer contributions, i.e. Section 106 agreements, Unilateral Undertakings, Section 278 agreements and, in the case of Rushcliffe, the Community Infrastructure Levy. The policy is pitched at a strategic level and is intended to be read alongside existing Part 2 Local Plan policies and (until they are superseded) Supplementary Planning Documents. However, the policy would be more effective if the Justification Text made reference to these mechanisms, noting that CIL is already described at paragraph 3.18.12.

In terms of procedures, Policy 8 of the Strategic Plan includes the trigger points and expected levels of provision for affordable housing. For other matters, such as open space or education, the trigger points for contributions and appropriate level of contributions for infrastructure are set out in existing Part 2 Local Plans and Supplementary Planning Documents.

Again, the policy would be more effective if the Justification Text made reference to these procedures.

Additional Modification

Paragraph 3.18.13

Where the necessary infrastructure provision is not made directly by the developer or through a CIL, contributions will be secured through planning obligations. **Planning obligations can take the form of Section 106 agreements, Unilateral Undertakings or, for work on the public highway, Section 278 agreements. Policy 8 includes the approach to affordable housing contributions, whilst existing Part 2 Local Plans and Supplementary Planning Documents set out trigger points and the appropriate level of contribution to be negotiated for other infrastructure contributions such as open space or education.** Planning obligation agreements will be drafted by the relevant local planning authority with the developer being responsible for the costs resulting from administering and monitoring the agreement. Future plans will provide more detailed information on the scope and operation of planning obligations.

Q81 Has the issue of viability been taken into account when seeking contributions for developments?

Yes, the issue of viability has been fully taken into account in assessing developer

contributions through the Greater Nottingham Strategic Plan Viability Study, 2024 [IN/5]. For further details, see **Appendix Matter 5 Q12, Q52, Q76, Q77, Q81 (Porter Planning)**.

Issue 2: Strategic allocations – Policies 19 - 32

Policy 19: Strategic allocation at Boots (Broxtowe)

Q82 Is there evidence to support a higher capacity on the site without undermining the policy objectives?

The Councils consider that the existing policy supports an appropriate level of development based on existing evidence, principally the evidence provided and assessed as part of the approved planning application.

It is acknowledged that the site may be able to support a higher capacity of development and this is reflected in the Plan in paragraph 3.19.6. However, any uplift would need to be justified through the submission and assessment of further robust evidence demonstrating that additional development would remain consistent with the objectives and requirements of Policy 19.

In particular, Policy 19 makes clear that redevelopment of the Boots site must be carefully planned and must respond to the site's key constraints and sensitivities. Any proposal for a higher capacity would therefore need to demonstrate, through detailed supporting information, that it would not undermine the protection and enhancement of the historic environment, including the significance and setting of important heritage assets, that it would provide an acceptable solution in relation to flood risk, sustainable drainage and wider environmental constraints, and that it would be supported by a robust transport assessment and appropriate mitigation. A higher capacity would also need to show that it could be accommodated within a comprehensive, masterplanned approach to the whole site, maintaining the quality of design, green and blue infrastructure, remediation strategy, and infrastructure delivery expected by Policy 19.

The Councils therefore consider that the current policy achieves a balance between allocating an appropriate amount of development based on existing evidence but allowing scope for additional development in future only where comprehensive evidence demonstrates that the full requirements of Policy 19 and the wider Strategic Plan can still be met.

Q83 Part 2.A.1. of the Policy requires that residential development should achieve an “appropriate density”. Is this requirement sufficiently clear?

Yes. The Councils consider that the requirement for residential development to achieve an “appropriate density” is sufficiently clear when read in the context of Policy 19 as a whole.

Policy 19 provides for a substantial mixed-use redevelopment, and the residential element must sit alongside employment uses, movement routes, green and blue

infrastructure, heritage considerations and flood risk mitigation within a comprehensive masterplanned framework. In that context, prescribing a numeric density target in the policy would risk being overly rigid and could conflict with the design-led and evidence-led assessment that the site requires.

The phrase “appropriate density” therefore allows residential density to be optimised in line with national policy for brownfield land, while ensuring that the eventual form of development remains compatible with the site’s particular characteristics and policy requirements.

Q84 Is the Policy sufficiently clear and robust in conserving and enhancing the historic environment? Does the Policy effectively meet the objectives set out in the justification text for the re-use of existing heritage assets within the site?

It is considered that the policy would be strengthened with the following Main Modification to reflect the terminology in the Framework:

Main Modification:

Policy 19.2.E 13. Proposals which ~~preserve~~ **conserve** and enhance the significance of heritage assets on site.

Additional Modification:

3.19.7 Proposals should be carefully designed to complement the existing attractive buildings, the ‘campus style’ layout and to ensure there are no adverse impacts on the historic environment. Of paramount importance is that the significance and setting of the Grade I and II* listed buildings on site should be ~~preserved~~ **conserved**.

Subject to this change, it is considered that the policy is sufficiently clear and robust, particularly when read alongside Policy 11 of the Plan. Paragraph 3.19.7 also identifies the importance of heritage assets within the site.

The objectives set out in the justification text include the re-use of D6 and D10 buildings but makes clear that this must be ‘appropriate’ and ‘protect’ and ‘celebrate’ their architectural, cultural and historic significance. It is considered that this objective can be achieved whilst also according with the clear policy requirements in relation to heritage set out in the policy text and in Policy 11.

Q85 Is the provision of new business and commercial space with a focus on the hi-tech sector and health and beauty referred to in part 2.B.3 included in the 82,000sqm of employment floorspace or in addition to it?

Yes, the provision of new business and commercial space with a focus on the hi-tech sector and health and beauty referred to in part 2.B.3 is included in the 82,000sqm of employment floorspace at the Boots site.

Policy 20: Strategic allocation Field Farm (Broxtowe)

Q86 Is the allocation justified as it seeks to deliver “around 450 dwellings”, which is below the threshold of 500 homes for the Councils’ proposed definition of strategic sites?

The site is included as it is an existing site allocation with the Aligned Core Strategy ([GNC8](#)). Were the site not to be allocated within the Strategic Plan, then there would cease to be site-specific policy in relation to this site, resulting in a policy vacuum and greater uncertainty for developers. The authorities therefore consider that the most appropriate approach is to re-allocate this site within the Strategic Plan.

The 450 homes reflects the existing allocation in the Aligned Core Strategy.

The allocation is therefore justified.

Q87 What improvements to road infrastructure have been secured through the extant planning permissions? Does part D.4. of the Policy require additional improvements to be secured?

Improvements to road infrastructure that have been secured are shown in drawing number 10172/004 Revision F for application number 11/00758/OUT. (This is the outline permission for the site, in which access was not a reserved matter.) The improvements include new vehicular accesses off the A6007 Ilkeston Road, revised highway boundaries on Ilkeston Road, widening of the roundabout at the junction of Ilkeston Road, Pasture Road and Stapleford Road, new pedestrian crossing facilities on Ilkeston Road, new footways and cycleways, and new footway links into the site.

(Details of new road infrastructure within in the site are shown on drawings for applications 15/00841/REM, 20/0116/FUL and 22/00601/REM.)

The requirements of parts 2.D.4 and 5 of the policy have been met and the policy does not require additional improvements to be secured. However, it is important for the requirements to be retained in order to provide a policy basis for the assessment of any future applications at the site.

Policy 21: Strategic allocation at Toton and Chetwynd Barracks (Broxtowe)

Q88 Is the need for the proposed junction and link road justified, and is the chosen location supported by robust evidence?

Yes, the need for the proposed junction and link road is justified and the indicative location is supported by robust evidence. There is existing congestion on the

highway network in the vicinity of the site which is demonstrated through the transport modelling ([IN/2](#)). Additional capacity at Bardills Island is considered by the local highway authority, Nottinghamshire County Council, to be essential to ensure that both the A52 and Toton Lane continue to function to effectively serve local and strategic needs. The transport modelling at paragraph 4.2.2, in relation to Toton Link Road, states “These locations have been identified due to experiencing the greatest increases in traffic demand at junctions which are already at or close to capacity”. Paragraph 4.2.2 then provides further technical detail regarding how the link road has been incorporated within the transport modelling and paragraph 6.3.5 states “On much of the SRN, there is generally an increase in junction congestion. There is however some reduction in V/C at A52 Bardhills Roundabout due to the additional capacity provided by the Toton Link Road infrastructure.”

Extensive work has been undertaken by Nottinghamshire County Council and the former East Midlands Development Company (now part of the East Midlands Combined County Authority) to design and further develop the plans for the link road. This detailed design work has informed funding bids, and the link road has formed part of the Transport Modelling (IN/1 and IN/2) which has been undertaken to support the Plan. The link road is also shown indicatively in the Broxtowe Part 2 Local Plan (GNC10) and in the Proposed Movement Framework Plan within the Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document (SPD) (GNC11).

The Indicative Plan, included as part of Policy 21, only shows an indicative location for the proposed junction, although it aligns with the SPD and the previous technical work undertaken. This is to allow some degree of flexibility in respect of the final location of the junction and the road, subject to final designs being agreed with National Highways.

Q89 How will the impacts of the proposed site allocation on the strategic highway network be mitigated, and would those measures be effective and deliverable?

Impacts of the proposed site allocation on the strategic highway network will be mitigated through a package of measures which have been included within the transport and highway modelling work ([IN/2](#)) which informed the policy choices within the Strategic Plan. The measures within this package include the proposed link road connecting the A52 with Toton (North and South), with a spur to the Chetwynd Barracks part of the site.

Throughout the evolution of the proposals for the Toton and Chetwynd Barracks site, the local highway authority, Nottinghamshire County Council, has been involved in helping to develop mitigation strategies. The developers have been working with the County Council and National Highways to develop solutions and to ensure that any measures will be effective and deliverable. This package of mitigation measures includes maximising active travel and public transport links, improvements to bus services and the safeguarding of the tram route to allow for

future expansion to the west. These measures will help to reduce the impact on the strategic highway network and are considered to be deliverable as part of developments on the allocation. The East Midlands Combined County Authority also identifies Nottingham – Derby (A52) as a key cross-region strategic corridor and as a key bus network corridor for the region (Matter 3 Appendix).

The Select Link Analysis work undertaken by Arup, and appended to [GCN6](#), indicates that the most significant highway impacts from uncommitted development are (underlined relates directly to Toton/Chetwynd):

- A52 WB to Nottingham Knight;
- A52 WB to Wheatcroft Island; and
- Derby Road EB to A52/QMC

The majority of uncommitted demand at these locations comes from:

- East of Gamston / North of Tollerton;
- Chetwynd Barracks; and
- Toton Strategic Location for Growth

The Select Link Analysis recommendations will ensure that development will not result in an unacceptable safety impact and that the residual cumulative impact on the operation of the highway would not be severe.

Detailed highway assessment work, including cumulative modelling, has also been undertaken in support of planning applications and to demonstrate that the impacts on the strategic highway network can be mitigated.

The release of land from the Green Belt for housing at Toton North East will help facilitate delivery of the link road. This enabling development justifies a 'very limited' release of land from the Green Belt. Further funding sources continue to be explored, including those available through the East Midlands Combined County Authority or other government funding sources.

**Q90 What is the justification for combining the two existing site allocations?
Are there any implications on the delivery of development?**

The sites have been combined as they share boundaries, infrastructure requirements and, in some cases, constraints which can be addressed in relation to both sites together. The authorities are of the view that this is a sensible approach to ensuring that necessary infrastructure, such as access, is deliverable and that this approach will help to ensure both sites come forward as quickly as possible. There is also a single SPD (Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document (SPD) (GNC11)) which covers the two existing allocations.

There are not considered to be any implications for the delivery of development of any parts of the site. The authorities anticipate that different plots on different parts of the site will come forward at different times and that the development of some

plots will be delivered sooner than others. A Main Modification (MM34) has been proposed to Policy 21 to explicitly make this position clear within a new part of the policy (new part 5). This states: *'Planning applications may be prepared either separately for individual land ownerships or jointly to combine land in different ownerships. Although it is expected that each area of the site should be comprehensively masterplanned to ensure that the different areas of the site are comprehensively integrated, it is expected that all development within all areas of the site should be able to come forward independently'*.

Q91 Is the revised housing trajectory (GNC4C) and proposed employment floorspace realistic and deliverable within the plan period?

Yes, both the revised housing trajectory and proposed employment floorspace are realistic and deliverable within the plan period. The site is sufficiently large to accommodate the identified amount of housing and employment floorspace during the plan period.

Planning applications for different plots and phases of the site are either currently being determined by the Borough Council or are currently in the process of being prepared by the landowners and their agents.

- Planning applications (25/00371/OUT and 25/00928/FUL) covering the majority of the "Toton South Character Area": 420 dwellings
- Planning application (25/00255/FUL) covering part of "Toton East Character Area" 155 dwellings
- Planning application (25/00306/OUT) covering part of "Toton East Character Area" and "Toton Northeast Character Area": 880 dwellings (note this also includes development on Green Belt outside of the allocation)

The authorities have been liaising closely with the landowners and their agents.

Assessment of the Toton and Chetwynd Barracks site by the authorities suggests that a number of different plots on the site (including Toton South, Toton East and Toton North East), and Chetwynd Barracks (initially Chetwynd West) could each start delivering housing in the earlier phases of the development of the site. Development at the site would then accelerate as plots at Chetwynd South, Chetwynd East and Toton North become available and start to deliver.

This is further confirmed through the Statement of Common Ground between Broxtowe Borough Council and Bloor Homes which provides an updated trajectory position for land in Bloor Homes' control and confirms delivery from 2027/28.

The authorities have received confirmation from another major landowner at the site, the Ministry of Defence (led by the Defence Infrastructure Organisation (DIO)) that progress is still being made to submit a planning application and plans to release the site for development remain unchanged. Technical work to support a planning application is also proceeding and an outline planning application is expected to be submitted to the local planning authority next year.

There is also the potential for other parts of the site to come forward later in the Plan period (which could see growth, particularly potentially of employment floorspace, over and above that expected within the 'minimum' allocations) at the wider site. As an example, Toton West may become available later within the Plan period, subject to the relocation of some of the existing rail-related uses.

The site is largely greenfield in nature, with relatively few constraints, and it is located in close proximity to one of the strongest local housing market areas in the borough and wider plan area. It is well connected in terms of transport infrastructure and is considered by the authorities to be highly likely to be very desirable to potential residents.

It is therefore considered that the trajectory and other proposed allocations are entirely realistic and deliverable within the Plan period. The site has both the capacity to accommodate the proposed growth and landowners and developers with plans and the necessary experience to deliver development on the site at pace.

Q92 What is the rationale for the Councils' suggested modification MM29 to remove the requirements for a park and ride facility, extension of the tramway and provision for rail connection to the park and ride? How would the policy still achieve its transport objectives?

An HS2 station was previously proposed adjacent to Toton West, as a part of the Eastern Leg of HS2. A proposed park and ride facility could have served the new station. Following the publication of the Integrated Rail Plan (November 2021) and the Government's subsequent decision to cancel the Eastern Leg of the HS2 project (in 2023), and then the decision last year to lift the HS2 safeguarding directions, the allocation of a new or potentially relocated park and ride facility can, in the view of the authorities, no longer be justified. There is already a widely used park and ride facility which is well located on the eastern side of Toton Lane / Stapleford Lane. In the view of the authorities, the relocation of this park and ride facility is now unnecessary and the high costs for limited gain cannot be justified, especially with a realistically relatively low chance of securing a railway station of any type adjacent to Toton West during the Plan Period. In the post-HS2 era, there is a risk that such additional infrastructure has not only been rendered unnecessary, but that there could be substantial viability and deliverability concerns.

It remains possible that, at some point in the future, opportunities may arise to extend the tramway, perhaps as a part of an extension across the Borough boundary to Long Eaton. For this reason, land within the site to accommodate such an extension to the tramway has been safeguarded as a part of this policy.

Therefore, the authorities have proposed Main Modification MM29 to address these issues in relation to transport infrastructure.

The proximity of the site to the existing park and ride facility (which is, in effect,

located within the heart of the Toton and Chetwynd Barracks site) should be highlighted. The existing tramway which serves this park and ride facility provides a direct connection to Nottingham railway station, which is located on the Midland Main Line with direct services to destinations across the region, Birmingham and the West Midlands, and fast, direct services south to London. The authorities are of the view that this facility, along with the many proposed new footpaths and cycleways, and a realistic prospect of new and improved bus services at improved frequencies within and around the site, will mean that this site will remain one of the most well-connected not only within the Plan area, but also within the wider region. The park and ride facility, extension of the tramway and provision for rail connection to the park and ride transport measures were also not included in the transport mitigation scheme undertaken as part of the transport modelling ([IN/2](#)).

Therefore, the policy will continue to meet its transport objectives.

Q93 What is the justification for limiting office development to Chetwynd South only, and how has the potential for office development elsewhere within the site allocation been considered?

The potential for office development at different locations across the site has been considered extensively during the preparation of the policy and accordingly 'at least 18,000 sq. m. of Class E (g) and Class B2' is proposed within part 3.B.3 of Policy 21; this is to be located at Toton North and Toton South. Use Class E (g) includes office development and other uses.

Whilst part 3.B.4 of Policy 21 currently proposes office development (Use Class E (g) (i)) 'only' at the Chetwynd South sub area of the Chetwynd Barracks part of the site, having considered the representations received in relation to the policy wording and following further assessment, the authorities are of the view that this part of the Policy wording is overly restrictive and so a Main Modification (part of Main Modification MM27) has been proposed by the authorities to widen the locations where office development would be acceptable, and therefore proposed, to other parts of Chetwynd Barracks.

Policy 22: Former Bennerley Coal Disposal Point (Broxtowe)

Q94 Is the proposed site allocation deliverable within the plan period, having regard to viability, infrastructure requirements, physical and environmental constraints? In particular, is rail-freight connection to the site achievable and deliverable?

As indicated in response to Initial Question 45 (in [GNC4](#)), the Viability Study ([IN/5](#)) assesses the site (at paragraphs 8.83-8.99) and takes account (paragraphs 8.85 and 8.91) of the potential provision of a rail connection in order to realise an opportunity to deliver a lower carbon distribution and logistics development.

The Viability Study also considers infrastructure requirements generally (paragraphs 8.90-8.91). These requirements are further addressed in the

Infrastructure Delivery Plan ([IN/3](#)), including in the tables at paragraphs 4.69 (page 40), 6.34 (page 75), 10.36 (page 100) and Appendix 1 (pages 118-119).

Physical and environmental constraints are dealt with in the Strategic Distribution and Logistics Background Paper ([EM/3](#)), which includes a summary of these issues for the site at pages 25-26 and details at pages 97-103. The issues are also addressed at pages 181-189 of the Site Selection Report Appendix A ([SS/4a](#)). Main Modifications MM36, MM39 and MM40 ([GNC4A](#)) and Other Modifications OM55 and OM57 ([GNC4B](#)) have been proposed in response to issues relating to physical and environmental constraints that were raised by the Environment Agency and Historic England.

A planning application has been submitted (25/00925/OUT) for up to 130,000 m² of B2, B8 and E(g)(iii) floorspace demonstrating there is active interest in bringing forward the site for development.

As a result of the analyses of viability, requirements and constraints, the Councils are confident that the proposed site allocation is deliverable within the Plan period, and this is confirmed through a Statement of Common Ground which is being prepared with the landowner.

With regard to the second part of the question, proposed Main Modifications MM35 and MM37 (in [GNC4A](#)) and Other Modification OM55 (in [GNC4B](#)) clarify that the policy requirement is to 'facilitate the provision of' (rather than 'provide') a rail-freight terminal. Even if the terminal were not to be provided in the short term, the choice of sites for logistics development in the Plan provides a crucial opportunity for the authorities to help reduce carbon emissions in the longer term and so mitigate the impact of the development on climate change, and congestion. Of the available options, the Bennerley and Ratcliffe sites have the potential to provide these vital benefits, by ensuring that rail access will be an option in the future. As also indicated in response to Initial Question 45 (in [GNC4](#)), 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.

Q95 Para 3.22.9 of the Plan refers to potential to provide a secondary access from Shilo Way. Have the implications of this been fully assessed?

The reference within the Plan to the potential provision of a secondary access from Shilo Way reflects the presence of an existing access point into the site and the potential to create new access points. The existing access currently serves a visitor centre and a small number of industrial units. This access may be capable of being utilised, subject to the necessary technical assessments being undertaken as part of any planning application process. A new access proposed from Shilo Way, shown as part of planning application 25/00925/OUT, has been supported by detailed technical highways assessments.

The supporting justification text should be read alongside criteria 2.C.8 and 9 of the main policy, which includes that development will be required to deliver any improvements to the road network necessary to mitigate adverse traffic impacts. This will ensure that appropriate access points are provided as part of the wider transport strategy for the site.

Policy 24: Strategic allocation Former Stanton Tip

Q96 What is the justification for the removal of this site?

The promoters of the site, Omnivale Ltd / Newsholme Developments, have made representations (see Response ID 1259194, Regulation 22 Statement of Consultation Appendix 1: Consultation Summaries Regulation 19 [SD/6a]). These confirm that discussions with the City Council have taken place and that, as a consequence of significant ground condition and ecological issues, the housing delivery on the site will be reduced below the threshold for allocation as a strategic site. The promoters of the site raise no objection to the deletion of Stanton Tip as a Strategic Allocation on the basis that its current Part 2 Local Plan allocation is maintained, to allow for a reduced level of delivery on the site, should this prove deliverable.

Main and Additional Modifications are proposed which will delete the site from the Strategic Plan, principally MM41 [GNC4a] and OM58 [GCN4b].

Policy 25: Strategic allocation at Broad Marsh

Q97 Does the proposed number of dwellings make effective use of the site?

Policy 25 sets out that the Broad Marsh site allocation is capable of delivering around 1,000 homes. This figure is based on the minimum likely number of units that are anticipated to come forward within the boundary of the site allocation. Policy 25 was informed by the current Masterplan for Broad Marsh which was unveiled by Nottingham City Council and its partners on 23 May 2024. It set out the ambition for the site to deliver new retail, leisure and visitor attractions and around 1,000 residential units. Whilst Homes England were involved in the commissioning of the 2024 Masterplan, it will be for the final Masterplan (also being commissioned by Homes England) to determine whether more homes could be accommodated, whilst still achieving the original vision/ambition and mix of uses for the site.

In considering this question in relation to making effective use of land for non residential uses, and ensuring the policy is flexible and therefore effective, a main modification is proposed to Part B of the Policy covering Mixed Use. This would make it consistent with the wording for Part A Housing.

Main Modification

Policy 25 B. Mixed Use

2. Provision of up to **around** 20,000 square metres of commercial, office and leisure floorspace to include space for independent retail and food / drink businesses and entertainment area, a hotel and community and education led uses. Proposals should seek opportunities for including independent retail and food and beverage uses and innovative community spaces.

Q98 Is the proposed site allocation demonstrably viable and deliverable within the plan period?

Homes England has now acquired the Broad Marsh site. They have advised the City Council over the timescale of delivery and the delivery trajectory set out in GNC4C was prepared with their input. Details of the deliverability of the Broad Marsh site can be found in **Appendix Matter 5 Q98, Q99 (Homes England)**

Q99 Is the revised housing trajectory (GNC4C) for the proposed site allocation at Broad Marsh justified, effective, and deliverable within the plan period?

Homes England have advised that the housing trajectory is deliverable within the plan period. Their response to this question is set out in **Appendix Matter 5 Q98, Q99 (Homes England)**.

Representations refer to Lichfields' "Start to Finish" report (2024) [\[HO/5\]](#) in arguing that the delivery rates for Broad Marsh are unlikely to be achieved. However, the Start to Finish report is not considered a good source of information for urban sites. Whilst it specifically looks at urban apartment schemes, it explains that annual build-out rates can be lumpy, as homes delivered can only be recorded when a block is completed. Of the 7 schemes considered in the report, 3 had higher average build-out rates than those envisaged at Broad Marsh, and the peak years build out was higher in 6 of them. (2 of the sites with low delivery were delayed by the financial crash, so are not typical examples.) The Broad Marsh site is made up of a number of distinct parts, and these are capable of parallel delivery. Homes England have endorsed the trajectory.

Q100 Should the requirement in paragraph 3.25.5 be part of Policy 25 rather than supporting text? Is that requirement as modified by the Council's OM60 justified and effective?

It is considered that paragraph 3.25.5 provides a useful clarification to Policy 25 to detail the aims of what the policy is seeking to achieve in terms of diversifying the housing stock available in the City Centre.

The City Council considers that OM60 is justified and effective. This approach is in line with Policy 8 of the Greater Nottingham Strategic Plan and Policy HO1 of the

Local Plan Part 2 which seek to diversify the type of residential accommodation available in the City Centre. In addition, the ambition for the Broad Marsh is to create a vibrant community within this area of the City Centre, and the Council believes that this is more effectively fulfilled by providing residential units for longer-term residents. Policy H06 (in the Part 2 Local Plan) requires applicants to demonstrate the need for student accommodation and the application of this policy was concluded as being effective by the Inspector who examined the Plan. As paragraph 3.25.5 (as amended by [OM60](#)) cross refers to another development plan policy (H06) in the Part 2 Local Plan, inclusion of this requirement in Policy 25 is not considered to be necessary.

However, in reflecting on the aims of Policy 25 and current housing needs, and in discussion with Homes England, it is proposed to add a further Main Modification to Policy 25 at clause 1.A.1 (see below) to make clear that large-scale shared living (Co-Living) accommodation will also be supported in addition to Use Class C3. This is to reflect the demand/supply for this type of accommodation being experienced in Nottingham, the recently published Nottingham City Council Informal Planning Guidance on this type of housing and the requirement to plan for this type of housing in the Draft National Planning Policy Framework/National Decision Making Policies (December 2025). An Additional Modification is also suggested which proposes an addition to the Glossary to define large-scale shared living accommodation. This change consequently necessitates a further Additional Modification to paragraph 3.25.5 to provide an explanation of large-scale shared living accommodation.

Main Modification

Add to end of Policy 25 1.A. 1

Provision of around 1,000 units (Use Class C3), **to support the diversification of City Centre housing stock in line with Policy 8,** to include a mix of sizes, type and tenure and elements of later living and Build to Rent units. **Large-scale shared living (Co-Living) accommodation will also be acceptable.**

Additional Modification (Note Additional Modification OM60 [\[GCN4B\]](#) also applies to this paragraph)

Add to paragraph 3.25.5:

It is expected that the site can accommodate high density urban living and deliver around 1,000 residential units (predominantly Use Class C3). **An exception to this will be made for large scale-shared living (Co-Living) accommodation to meet housing needs for young professionals and graduates.** Purpose Built Student Accommodation will not be permitted, as the objective is to create a new vibrant City Centre community, which will be assisted through provision of more permanent residential opportunities and year

round activation, and there is plentiful choice of sites and locations for Purpose Built Student Accommodation elsewhere within the City Centre. There will be a focus on ensuring a wide mix of housing across the site so that units include an element of later living for the elder sections of the population and also an element of Build to Rent properties. Policy 10 (Design and Enhancing Local Identity) will be particularly important in establishing standards and quality and also in establishing a balance between activity and vitality, and living conditions.

Additional Modification

Add to the Glossary

Large-scale shared living accommodation: Non-self-contained accommodation which provides private rooms alongside shared communal spaces and facilities. This type of accommodation does not constitute self-contained dwellings (use class C3), HMOs, student accommodation, hotels, or other residential institutions. Tenancies should be for a minimum of 3 months.

Q101 Is the policy sufficiently clear on the type and quantum of affordable housing required?

The quantum of affordable housing required on sites is detailed in Policy 8: Housing Size, Mix and Choice (Parts (a) and (b)), whilst the type will be determined through the final masterplan commissioned by Homes England and the criteria at Policy 8 Parts 9 (a) and (b).

In the light of this question, an Additional Modification to Paragraph 3.25.5 is proposed as it will assist the Plan's effectiveness.

Additional Modification

Add to end of paragraph 3.25.5 **Affordable housing provision should be in accordance with Policy 8.**

Q102 What is the rationale for excluding Broad Marsh Bus Station and land to the east of Middle Hill, Carrington Street and Albion House from the proposed site allocation?

The Broad Marsh Bus Station has been excluded because it has recently been redeveloped into a new bus station with library and retail units.

The land to the east of Middle Hill has been excluded because it has recently been developed as the new Nottingham College.

Carrington Street has been excluded because a large part of the frontage has been subject to Historic England funding to restore and enhance the shop frontages. These buildings are not expected to be redeveloped. The most northerly unit on Carrington Street is vacant, but its restoration or redevelopment is not linked to the redevelopment of the Broad Marsh shopping centre and associated structures. The properties on Carrington Street are not in the ownership of Homes England.

Albion House (and the frontages to Castle Boulevard) are excluded as they are also not in the ownership of Homes England. Richmond House (adjoining Albion House) and the Canal Street frontages are also historic assets which are not expected to be redeveloped as part of the Broad Marsh scheme.

Policy 26: Strategic allocation Melton Road, Edwalton (Rushcliffe)

Q103 Is Part 2.B.3. of the Policy effective in identifying the type of employment and employment generating uses that would be acceptable on the site?

Yes. The southern area of the site is considered to be appropriate for a variety of employment-generating uses and has benefitted from planning permission for uses within Use Classes C2 and E, and for certain sui generis uses as part of the business park and new local centre.

The wording of part 2.B.3 of Policy 26 has essentially been carried forward from Policy 20 of the Rushcliffe Local Plan Part 1: Core Strategy (adopted 2014) (GNC9) but updated to reflect current use classes. It is considered that this policy approach has operated effectively over the past 12 years, and there is no clear or obvious reason to change it.

Policy 27: Strategic allocation Land north of Bingham (Rushcliffe)

Q104 Are there any proposed changes to what has already been granted planning permission on the site?

No, there have been no material changes to what was originally granted planning permission for development on the site. Outline planning permission was granted in December 2013 for up to 1050 residential dwellings (use class C3); 15.6 hectares of employment development (use classes B1, B2 and B8); local centre comprising up to 300 metres square of retail floor space (use class A1); primary school (use class D1); and community centre (use class D2); a 1.6 hectare mixed use site (use classes B1, B2, B8 and car parking); allotments and open space (including play areas and community park); flood management and drainage works; transport and access works; and ancillary works.

Policy 28: Strategic allocation Former RAF Newton (Rushcliffe)

Q105 Are there any proposed changes to what has already been granted planning permission on the site?

The site's outline planning permission, approved in January 2014, allows for up to 550 dwellings (10/02105/OUT). A reserved matters application (19/02689/REM) was approved in August 2020 for 528 dwellings across the site. Subsequently, a variation application (25/00621/VAR) to this reserved matters permission was approved in November 2025. This variation increased the number of dwellings with detailed planning permission from 528 to 545. The latest expectation, therefore, is that the site will deliver 545 dwellings.

Policy 29: Strategic allocation Former Cotgrave Colliery (Rushcliffe)

Q106 Is the allocation justified as it seeks to deliver “around 450 dwellings”, which is below the threshold of 500 homes for the Councils’ proposed definition of strategic sites?

The allocation is justified. The site was allocated in 2014 as part of the Rushcliffe Local Plan Part 1: Core Strategy ([GNC9](#)) and is now largely developed, with all new dwellings delivered on site several years ago.

The allocation is being carried forward as part of the Plan to ensure that the provisions currently within the Core Strategy continue to guide development and that the remaining undeveloped portion of the site is brought forward for the intended employment uses. If the allocation and its supporting Policy 29 were deleted from the Plan, there would no longer be a site-specific policy for the site (as the Greater Nottingham Strategic Plan will replace the Core Strategy). This would critically weaken the justification for ensuring that new employment land is delivered as part of a sustainable mixed-use development.

Q107 Are there any proposed changes to what has already been granted planning permission on the site?

No, there have been no material changes to what was originally granted planning permission for development on the site. Outline planning permission was granted in March 2011 for up to 470 dwellings and employment uses. Subsequently, 463 dwellings were delivered on the site, with the final dwellings completed during the 2018/19 monitoring year.

Policy 30: Strategic allocation South of Clifton (Rushcliffe)

Q108 Are the housing delivery rates set out in the trajectory (GNC4C) justified?

Yes, it is considered that the delivery rates set out in the housing trajectory are justified. The proposed delivery rates are assessed as part of the Council's latest

Strategic Housing Land Availability Assessment (SHLAA) ([GNC18](#), page 41). Delivery assumptions for the period 2025 to 2030 have been provided by the site owners on a phase-by-phase and year-by-year basis. From 2030 onwards, an average of 250 dwellings per annum is assumed. This rate of delivery is considered achievable for a multi-phased Sustainable Urban Extension with multiple points of access.

In addition, the site benefits from the involvement of Homes England through its accelerated housing delivery programme. The majority of the site is already fully serviced by spine roads and utility connections, enabling each phase of development to be commenced quickly. For example, 132 dwellings were completed on Phase 3 of the development in the 2024–2025 monitoring year (planning reference 25/02562/REM), as identified at page 12 of Appendix Q68 ([GNC4H](#)) of the Council's response to the Inspectors' initial questions ([ID2](#)).

Q109 What is the evidence to justify the allocation being smaller than the area granted outline planning permission in 2019 as shown on map submitted in response to IQ68?

The extent of the allocation appropriately differs from the area covered by the planning permission, as the allocation does not include land within the Green Belt and is instead aligned with the area expected to accommodate built development. By contrast, the planning permission covers areas of enhanced green infrastructure and screening, playing pitches, and balancing areas. These are uses that are not inappropriate in the Green Belt, provided that openness is maintained, and can therefore appropriately come forward on land outside the allocation.

Policy 31: Strategic allocation East of Gamston/north of Tollerton (Rushcliffe)

Q110 Is the allocation consistent with national planning policy and the Government's General Aviation Strategy for recognising the importance of maintaining a national network of general aviation airfields?

The allocation is consistent with national planning policy and the General Aviation Strategy.

The site was first allocated in the 2014 Rushcliffe Local Plan Part 1: Core Strategy ([GNC9](#)) and, at that time, operated as a private airport. The airfield has since been permanently closed to fixed-wing aircraft by the landowner, Vistry Homes Ltd, who purchased the site on the basis of its status as an allocated site.

Further evidence to justify that the allocation is consistent with national planning policy at paragraph 110(f) of the Framework is set out within the Statement of Common Ground between the Council and the Site Promoters (Vistry Homes Limited, Taylor Wimpey UK Limited, Rockspring Barwood Gamston Limited, Arc Partnerships).

Even if retention of the airfield were possible, the importance that the Framework attaches to general aviation airfields is only one of a number of competing factors that must be balanced when seeking to meet housing and other development needs and to deliver sustainable development. While the airfield has contributed, and to some extent continues to contribute, economic value in serving business, leisure, training and emergency service needs, this must be balanced against the significant economic and social benefits arising from the delivery of around 4,000 new homes on the wider allocation (with 30% proposed as affordable housing) and approximately 15 hectares of new employment development.

The continuation of aircraft movements at this location would undermine the delivery of a major sustainable urban extension in one of the most sustainable locations within Rushcliffe, adjacent to the Nottingham urban area and in relatively close proximity to Nottingham city centre. The site is expected to deliver a substantial proportion of Rushcliffe's housing need over the plan period and beyond.

Q111 What evidence is there to support the housing delivery rates for the site set out in the revised housing trajectory (GNC4C)?

The delivery rates for the site included within the trajectory (with total delivery of around 2,300 dwellings during the plan period) are based on a combination of delivery rates and assumptions contained within the Joint Methodology Report for Strategic Housing Land Availability Assessments (SHLAAs) 2023 update ([HOU/6](#)), and the deliverability summary within the Council's latest SHLAA ([GNC18](#), page 553). The trajectory assumes that the site will begin to deliver dwellings in 2030/31 (with the exception of a standalone residential care development in 2027/28), and that delivery will average around 220 dwellings per annum from 2032/33 onwards.

However, these assumptions are considered to be on the cautious side. In accordance with standard SHLAA practice, as planning permission has yet to be granted, no delivery is assumed within the 0 to 5-year period. Delivery is instead assumed within years 6 to 10. However, once planning permission is granted (as is expected relatively soon) delivery would be expected to commence earlier, within the 0 to 5 year period. The peak average annual delivery rate is also likely to markedly exceed 220 dwellings per annum.

By comparison, it is useful to refer to delivery rates on the Melton Road, Edwalton allocation, shown below:

Year	Dwellings delivered at Melton Road, Edwalton
2016/17	40
2017/18	126
2018/19	271
2019/20	144
2020/21	140
2021/22	291

2022/23	261
2023/24	162
2024/25	75

During its peak delivery years, between 2018/19 and 2022/23, the Melton Road, Edwalton allocation achieved delivery of around 220 dwellings per annum, despite being less than half the size of the East of Gamston / North of Tollerton allocation and more constrained in terms of access points; thereby limiting the ability to develop multiple parcels concurrently. Accordingly, it is reasonable to assume that the Gamston / North of Tollerton site could comfortably exceed an average delivery rate of 220 dwellings per annum once development gains momentum, before slowing towards the end of the build-out period.

In this regard, the site promoters have recently provided evidence that the site should be able to accommodate around 3,100 dwellings in total within the plan period; approximately 800 more than the figure included in the revised trajectory at [GNC4C](#). The evidence for this is set out in more detail within the agreed Statement of Common Ground between the Council and the Site Promoters, and the Council is in agreement with the delivery assumptions included in the statement.

Q112 What progress has been made on the masterplanning and design code process?

The East of Gamston/North of Tollerton Development Framework Supplementary Planning Document (SPD) ([GNC14](#)) was adopted by RBC on 10 March 2026. The SPD sets out a coherent vision for the comprehensive development of the entire allocation, supported by a Land Use Plan, a Framework Masterplan, and a Site Wide Design Code.

The SPD is currently subject to a claim for judicial review, which the Council is defending. This process may not be resolved for several months and could extend beyond the determination of the current planning applications for major development on the site. However, while legal proceedings remain ongoing, the SPD remains in force.

It should be noted that, under the Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026, existing SPDs will cease to have effect as SPDs once a new local plan is adopted, replacing the plan upon which the SPD is based. As the SPD supplements policy within the Rushcliffe Local Plan Part 1: Core Strategy (2014) ([GNC9](#)), which will be replaced by the Greater Nottingham Strategic Plan (GNSP), it will cease to function as an SPD upon adoption of the GNSP. The Council will, however, continue where possible to use the document as material planning guidance and may consider preparing a new-style Supplementary Plan for the site, drawing on the existing SPD.

Nevertheless, with or without SPD status, it is expected that site promoters will

submit information alongside their respective planning applications to demonstrate alignment with the Framework Masterplan, ensuring a coordinated and comprehensive approach to development across the allocation. It is also expected that the Site Wide Design Code will be submitted with each application. These documents will therefore inform the determination of applications and the assessment of subsequent reserved matters. Further matters in this regard are highlighted in the agreed Statement of Common Ground between the Council and the Site Promoters.

While development could proceed in the absence of the SPD's formal status, it is considered that there would be merit in modifying Policy 31 and its supporting text to better manage this scenario. In particular, the SPD introduces key mechanisms such as an Infrastructure Delivery Plan (IDP) to coordinate infrastructure provision, and a framework Section 106 approach to ensure consistency in planning obligations. Accordingly, the following proposed modifications are suggested, drawing on relevant SPD provisions, to strengthen the effectiveness of the policy in this respect.

Proposed Additional Modification

3.31.7 The Council expects that there should be a comprehensive masterplan and development framework for the site as a whole and for its entire development. To meet this requirement, the Council ~~is preparing~~**has prepared** a site-wide masterplan and development framework for the allocated site which ~~will be~~**has been** adopted as a Supplementary Planning Document (SPD) ~~or Supplementary Plan (SP)~~. The document ~~will~~**provides guidance** to coordinate and guide individual developments and their relevant planning applications and associated planning obligations across the site. **The Council will consider whether this guidance should be taken forward in a new Supplementary Plan.** In order to ensure a coordinated and consistent basis to planning obligations for developments of parts of the overall site, it is expected that an overarching common Framework Section 106 approach will be prepared and applied in relation to infrastructure obligations in respect of all applications for development of the site. **This approach will include the preparation by the Council of a template framework Section 106 agreement which shall be used as a base for all Section 106 agreements relating to any development of the site save exempt development (being non-residential development of less than 1,000 square metres or residential development of less than 10 dwellings, unless a larger development above these thresholds has been sub-divided into smaller developments which shall not be exempt.)**

[New paragraphs following 3.31.7]

3.31.X The framework Section 106 agreement approach will be supported by a Gamston SUE Infrastructure Delivery Plan (Gamston SUE IDP), developed by the Council, which will set out the infrastructure required to deliver and operate this site and which type of development is expected to contribute towards each item of infrastructure. The Gamston SUE IDP may be updated by the Council no more than annually, unless circumstances

indicate an interim review is necessary with such revisions being consulted upon by the Council as appropriate and then published. The template framework Section 106 agreement is expected to include the following key terms:

- (i) payment of Section 106 contributions towards infrastructure (informed by the Gamston SUE IDP) together with an acknowledgement that such contributions may be used to repay forward funders of the infrastructure;
- (ii) works in kind, which may be permitted at the discretion of the local planning authority and highways authority instead of payment of all or part of some Section 106 contributions;
- (iii) equalisation provisions requiring landowners and developers to submit to dispute resolution where the local planning authority or highways authority confirms that there is a need for the landowner or developer to enter into an equalisation agreement and it has not been entered into within a reasonable period of time; and
- (iv) access provisions, requiring access to be made available at nil cost for the purpose of delivery of any infrastructure and requiring access to be provided to adjacent parcels of land.

3.31.XX Development within this site will also be expected to contribute towards or deliver site specific infrastructure via the framework Section 106 agreement. The land on which any infrastructure is located will be provided and/or transferred to the local planning authority, the highways authority or National Highways (or other relevant body) for nil value.

Q113 Is the allocation consistent with national planning policy relating to flood risk?

Yes, the allocation is consistent with national policy relating to flood risk. The large majority of the allocation lies within Flood Zone 1, as evidenced by the Flood Modelling Position Statement and Sequential Test Update ([CC/1](#)).

The Sequential Test confirms that there are no suitable or reasonably available alternative sites at a lower risk of flooding within the relevant search area. Consequently, the Exception Test is engaged. The site will deliver significant sustainability benefits, including a well-connected urban extension and supporting infrastructure, and can be designed to remain safe for its lifetime without increasing flood risk elsewhere through appropriate masterplanning and mitigation measures. The Exception Test is therefore considered to be met, and the requirements of national planning policy are fully satisfied.

Q114 What evidence is there for contamination on the site and to what extent would that constrain development?

The Council is aware of the historic and existing uses of the wider site, including part of the site's use as an airfield, and the potential for land contamination associated with these activities. The potential for some element of contamination on sites with a long history of human activity, particularly those covering large areas, is not unusual. There is no reason to presume that any contamination found would unduly constrain the site's development and cannot be dealt with and remediated, where required, as part of the normal planning and development process.

In accordance with normal practice, the detailed investigation of the extent and implications of any contamination, along with the identification of any necessary remediation measures, are appropriately matters for the planning application stage and are secured through planning conditions where permission is granted.

Both current major planning applications on the site (20/03244/OUT for up to 2,250 dwellings and associated development and 24/00347/HYBRID for up to 1,600 dwellings and associated development) have been supported by initial land contamination assessments. During the course of the application process to date, the Council's Environmental Health team and the Environment Agency have advised that, should planning permission be granted, conditions should be imposed requiring further detailed investigation and assessment of land contamination issues, including the potential for radioactive contamination. These measures are necessary to ensure that all parts of the site are suitable for their intended uses.

The planning conditions will require that the land contamination assessment be carried out in accordance with the Land Contamination Risk Management (LCRM) Framework and associated good practice guidance. LCRM uses a staged risk based approach. Where the findings of the risk assessment stage identify unacceptable risks to human health and/or the environment, a detailed Remediation Scheme will be required and must be approved by the Council prior to implementation. In line with LCRM, the planning conditions will also require submission for approval of a verification report(s) to demonstrate the required remediation has been completed prior to occupation.

Q115 Would the Policy be effective in protecting or enhancing heritage assets on the site?

Yes, the policy would be effective in protecting and enhancing heritage assets on the site.

Policy 31 clearly requires the preparation and implementation of a Heritage Strategy. This will provide a detailed assessment of the significance of heritage assets, including the contribution made by their setting, and will inform the design and layout of development. It will also set out how proposals will secure the

protection and/or enhancement of heritage assets and their setting, including appropriate mitigation measures.

The site is further supported by detailed guidance within the East of Gamston/ North of Tollerton Development Framework SPD ([GNC14](#)), which identifies key heritage sensitivities and establishes clear design and layout principles to safeguard their significance.

The SPD expects development proposals to respond positively to the setting of heritage assets, including through the use of appropriate buffers, landscaping, and the retention of important views. It promotes a design-led approach that integrates heritage considerations from the outset, alongside the delivery of green infrastructure to reinforce the setting of historic features. In addition, proposals are required to be informed by proportionate heritage impact assessments and, where necessary, archaeological investigation, in line with national policy. Taken together, these measures provide a robust and effective framework to ensure that heritage assets are conserved and, where opportunities arise, enhanced.

The principal heritage assets within the site are largely located within the area covered by planning application 24/00347/HYBRID, submitted by Vistry Homes in 2024. Historic England's most recent consultation response (24 May 2026) raises no objection to the application on heritage grounds. This demonstrates that development can be brought forward without resulting in unacceptable harm to heritage assets.

Q116 Would development of the site give rise to an unacceptable impact on highway safety or taken with other development in the area, the cumulative impacts on the road network would be severe?

The site lies to the east of the A52 Gamston Lings Bar Road and will be primarily accessed from it. The A52 forms part of the Strategic Road Network (SRN), for which National Highways is the highway authority.

The Memorandum of Understanding with National Highways ([GCN6](#)) indicates (paragraph 4.7) that "Each development must be evaluated on a case-by-case basis at planning application stage to ensure that the cumulative impacts on the network are effectively managed". This applies to this site, as the large majority of its planned development does not yet have planning permission and it could potentially have a congestion effect on the highway network without appropriate mitigation.

The Select Link Analysis work undertaken by Arup, and appended to [GCN6](#), indicates that the most significant highway impacts from uncommitted development are:

- the A52 westbound to Nottingham Knight;
- the A52 westbound to Wheatcroft Island; and
- Derby Road eastbound to the A52/QMC junction.

The majority of uncommitted demand at these locations comes from:

- East of Gamston/North of Tollerton;
- Chetwynd Barracks; and
- Toton Strategic Location for Growth

The Select Link Analysis recommendations will help ensure that development will not result in an unacceptable safety impact and that the residual cumulative impact on the operation of the highway would not be severe.

The response prepared by Arup at **Appendix Matter 3 Q63** considers whether any unacceptable impact on highway safety or cumulative impacts on transport networks have been identified. Arup advises that: "...whilst parts of the SRN [Strategic Route Network] are already subject to congestion and residual impacts remain in the 'growth with mitigation' scenario, the evidence demonstrates that a substantial proportion of network pressure arises from existing and committed development rather than from new allocations. Where unconsented growth does contribute to localised impacts, a package of strategic mitigation has been identified and tested at the plan-making stage, with further targeted interventions to be confirmed as sites are designed and brought forward. In this context, mitigation will evolve iteratively with detailed solutions appropriately refined through the development management process. Accordingly, there is no clear basis to conclude that the Local Plan would give rise to residual cumulative impacts that are severe."

In addition, detailed transport assessments, including cumulative modelling, have been prepared in support of the site's planning applications to demonstrate that impacts on the SRN can be mitigated and that development would be acceptable in highway safety terms.

To help ensure this outcome, Policy 31 (parts 2.D.7–11) sets out specific requirements, including:

- necessary improvements to road infrastructure, including the A52 Gamston Lings Bar Road;
- measures to provide direct access to the A52 and minimise traffic impacts through Tollerton village;
- enhancements to public transport, including bus services;
- improvements to walking and cycling connections within and beyond the site, particularly to Gamston;
- implementation of a Travel Plan; and
- financial contributions towards a package of improvements to the A52 corridor between the A6005 (QMC) and the A46 (Bingham).

Improvements to the A52 at Radcliffe on Trent and the Gamston roundabout (A52/A6011) have already been completed. Major upgrades to Wheatcroft roundabout (A52/A606) and Nottingham Knight roundabout (A52/A60) are programmed to commence in 2026. As set out in the Rushcliffe Local Plan Part 1:

Core Strategy (2014) ([GNC9](#)) and Policy 31 of the GNSP, these interventions are integral to supporting the site's development, and development will be expected to contribute towards them (as required by part 2.D.7 to 11 of Policy 31).

It is anticipated that delivery of new access junctions and upgrades to the A52 will be required early in the development to manage traffic and mitigate congestion. Active travel measures and enhanced public transport provision will also be prioritised to reduce reliance on private vehicles and support sustainable movement within and beyond the site. The detailed scope of these measures will be informed by the ongoing transport assessment work and the preparation of an Infrastructure Delivery Plan (IDP) for the site.

Further details on the transport assessment work and the IDP are set out within the Statement of Common Ground between the Council and the Site Promoters. The IDP's provisions will be secured through planning conditions and/or planning obligations.

As the Statement of Common Ground makes sets out, the Site Promoters are aligned in providing a single, comprehensive access strategy for the whole allocation, supported by a consistent evidence base. A substantial body of transport modelling has already been agreed with the relevant highway authorities, and updated transport assessments are being finalised for submission with each planning application. These will be assessed by the Council and highway authorities to ensure that impacts are acceptable with appropriate mitigation. Such detailed matters are properly addressed at the planning application stage.

Policy 32: Strategic Allocation Former Ratcliffe on Soar Power Station (Rushcliffe)

Q117 Is the delivery of the proposed site allocation achievable within the plan period?

Yes, the allocation is deliverable within the plan period.

Condition 11 of the Ratcliffe Local Development Order (LDO) ([GNC4Ji](#)) requires the submission and approval of a phasing plan for the site. The phasing plan ([GNC23](#)) was approved by the Council in March 2026 and is required to be kept under review as development progresses. Its primary purpose is to ensure that essential infrastructure and services are delivered at the appropriate time to support the development.

The agreed phasing plan identifies five broad phases of development across the site (Phases A–E, as illustrated at Appendix 1 of [GNC23](#)). It indicates that development would commence in 2025, with final completion in 2040 (as set out in section 2.2 of [GNC23](#)). However, the site owner, Uniper, has provided an updated programme, which moves each phase back by approximately one year:

Phases	Approved phasing	Updated phasing
A	2025-28	2026-29
B	2025-30	2026-31
C	2025-35	2026-36
D	2028-35	2029-36
E	2030-40	2031-41

Notwithstanding this adjustment, the overall programme still demonstrates that the site can be delivered within the plan period.

A significant proportion of land south of the A453 is currently undeveloped and is therefore capable of coming forward early, forming part of Phase C. In addition, substantial areas in the northern part of the site (identified within Phases A, B and C) are also capable of coming forward early. Some existing buildings on the site are intended to be retained.

The later phases (Phases D and E) are subject to specific constraints. Phase D is dependent on prior gypsum mining operations, while Phase E requires demolition and remediation of the former power station structures. Demolition is currently anticipated to be completed by 2029, and a contractor has recently been appointed by Uniper to undertake this work.

A key factor influencing the delivery trajectory is the capacity of M1 Junction 24 to accommodate additional traffic associated with this and other major developments locally. As set out in paragraph 3.32.9 of the Plan, the LDO restricts the later stages of development until a comprehensive transport solution has been agreed. This must take account of cumulative impacts arising from other major sites in the area, including those associated with the East Midlands Freeport.

The levels of development allowed are restricted above specified thresholds until further transport assessment work is undertaken to determine the impact on M1 Junction 24 and the wider highway network and/or appropriate transport mitigation is delivered or is scheduled for delivery in order to ensure that unacceptable road safety impacts or severe impacts on the operation of the highway are avoided.

The work required to ensure that this mitigation is delivered and in time to enable the site's delivery within the plan period is ongoing. Progress is detailed in the Council's response to Question 67 (Matter 3). As referred to there, the East Midlands Freeport Strategic Infrastructure and Contributions Supplementary Planning Document (SPD) is expected to be adopted by Rushcliffe Borough Council, North West Leicestershire District Council and South Derbyshire by 30 June 2026. This will establish a mechanism for securing pooled Section 106 contributions (or, where appropriate, works in kind) from multiple development sites, including this allocation, towards the delivery of strategic infrastructure, and most particularly M1 junction 24 improvements.

Although such contributions could, in principle, be secured without the SPD, its

adoption will provide a consistent and coordinated framework for doing so, which is particularly important and helpful given that the relevant development sites fall across multiple local authority areas. However, it is recognised that, under the Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026, existing SPDs will cease to have effect as SPDs once a new local plan is adopted, replacing the plan upon which the SPD is based. As a result, the SPD may only have a limited lifespan prior and lose its status as an SPD once the Greater Nottingham Strategic Plan is adopted.

In order to address this scenario as best as possible, it is considered that Policy 32 should be strengthened to provide greater certainty in securing pooled developer contributions. The proposed modifications are intended to enhance the effectiveness of the policy in delivering the necessary infrastructure. It should be noted that the suggested amendment to part 1 of Policy 32 reflects similar wording already included within Policy 31 (the site-specific policy for the East of Gamston/North of Tollerton strategic allocation).

Proposed Main Modification

Policy 32 (1) The area, as shown on the adopted policies map, is identified as a strategic site for employment development, including strategic distribution, for the purposes of delivering an industrial park focused on advanced manufacturing (including technology needed to transition to net-zero), green and low-carbon energy generation and energy storage. The design and layout of the entire site will be determined through a masterplanning process. The development shall be appropriately phased to take into account provision of necessary infrastructure, including improvements to the strategic and local highway network and public transport network. **All development should contribute on a fair, consistent and proportionate basis towards strategic transport infrastructure, remediation and/or ground condition work requirements, including, where appropriate, where any of these items have been forward funded or delivered by others but are necessary for the delivery of the development of the allocation site as a whole.** The indicative distribution of the proposed uses is identified on Figure 32.1.

Policy 32 (2) D.10 Improvements to road infrastructure necessary to mitigate adverse traffic impacts and serve the new development, including improvements to the A453 and likely improvements to Junction 24 of the M1 and local roads, **taking into account cumulative development on the wider network and, where appropriate, set within a monitor and manage framework relating to both the Strategic Road Network and Local Highways Network.**

Proposed Additional Modification

3.32.3 In July 2023, Rushcliffe Borough Council adopted a Local Development Order (LDO) for the site in order to streamline the planning process and to specify the types of uses in clearly defined areas which would be permitted. In accordance with East Midlands Freeport and emerging East Midlands

Development Corporation aspirations for the site, the LDO allows for the creation of an industrial park focused on advanced manufacturing (including technology needed to transition to net-zero), green and low-carbon energy generation, and energy storage. The LDO grants planning permission for the site's development in accordance with the conditions applied to the Order and the other provisions contained within it. **Applications for development not permitted by the LDO shall be determined in accordance with this Policy 32 and the Framework Section 106 Agreement approach described above, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (or such replacement legislation as may apply from time to time.)**

3.32.9 The LDO and this policy appropriately restricts delivery of the later stages of the development until such time as a holistic transport solution has been agreed for the site, taking into account other major developments in the wider area including sites which are also designated as part of the East Midlands Freeport. The levels of development allowed is restricted above specified thresholds until further transport assessment work is undertaken to determine the impact on M1 Junction 24 and the wider highway network and / or appropriate transport mitigation is delivered or is scheduled for delivery in order to ensure unacceptable road safety impacts or severe impacts on the operation of the highway are avoided. **To ensure that all development within this site and within the other sites designated as part of the East Midlands Freeport (as well as other sites which will be unlocked by or significantly benefit from the same) contributes on a fair and equitable basis towards strategic transport infrastructure required for the development of this site, it is expected that an overarching common framework Section 106 approach will be applied to such development. This approach will include the joint preparation by the local planning authorities for the East Midlands Freeport sites of a template framework Section 106 agreement which shall be used as a base for all Section 106 agreements relating to such development save exempt development (being non-residential development of less than 1,000 square metres or residential development of less than 10 dwellings, unless a larger development above these thresholds has been sub-divided into smaller developments which shall not be exempt.)**

[New paragraphs following 3.32.9]

3.32.X The framework Section 106 agreement approach will be supported by an Infrastructure Delivery Plan (IDP), also developed jointly by the local planning authorities for all the East Midlands Freeport sites, which will set out the strategic transport infrastructure required to deliver and operate this site and the other East Midlands Freeport sites and identify which other strategic allocation sites will be expected to contribute towards any of that strategic transport infrastructure. This IDP may be updated by the local planning authorities no more than annually, unless circumstances indicate an interim review is necessary with such revisions being consulted upon by the local planning authorities as appropriate and then published. The template framework Section 106 agreement is expected to

include the following key terms:

- (i) payment of Section 106 contributions towards strategic transport infrastructure (informed by the IDP) together with an acknowledgement that such contributions may be used to repay forward funders of the strategic transport infrastructure;**
- (ii) works in kind, which may be permitted at the discretion of the local planning authority and highways authority instead of payment of all or part of some Section 106 contributions**
- (iii) equalisation provisions requiring landowners and developers to submit to dispute resolution where the local planning authority or highways authority confirms that there is a need for the landowner or developer to enter into an equalisation agreement and it has not been entered into within a reasonable period of time; and**
- (iv) access provisions, requiring access to be made available at nil cost for the purpose of delivery of any strategic transport infrastructure and requiring access to be provided to adjacent parcels of land**

3.32.XX A monitor and manage framework will be adopted to inform the timing of necessary strategic highways infrastructure improvements, including assessment in relation to the Local and Strategic Road Networks, and specifically M1 Junction 24. A monitoring and manage framework is an evidence-led, flexible approach which involves monitoring traffic and implementing measures at the required time. Any contributions towards strategic transport infrastructure will be provided in accordance with the framework Section 106 approach described above. Strategic transport infrastructure and associated mitigation will be delivered in accordance with schemes approved by National Highways and the relevant Local Highway Authority, and frameworks for the Strategic and Local Highway Networks.

3.32.XX Development within this site will also be expected to contribute towards or deliver site specific infrastructure via the framework Section 106 Agreement. The land on which any strategic infrastructure is located will be provided and/or transferred to the local planning authority, the highways authority or National Highways for nil value.

Q118 Would the 20% biodiversity net gain requirement apply to the proposed strategic allocation at Ratcliffe on Soar Power Station given that the Local Development Order specifies a 10% biodiversity net gain requirement?

Development on the site would only be subject to the proposed 20% biodiversity

net gain (BNG) requirement where a planning application is submitted for all or part of the site. Development coming forward under the existing Local Development Order would not be subject to this requirement, as the LDO requires only 10% BNG.

Q119 What is the justification for limiting the total quantum of strategic distribution and logistics development to approximately 22% of the permitted floor area and restricting such uses to the Northern Area (north of the A453) only?

The vision for the site, as established through the Local Development Order (LDO) adopted in July 2023, is to create a centre for low-carbon energy generation and storage uses that are efficient in their use of energy, to provide facilities for advanced manufacturing, including technologies needed to transition to net zero, and that provide research and/or training facilities for innovation of technologies needed to transition to net zero. To ensure that new development accords with the vision for the site, restrictions are placed on the types of uses permitted across different parts of the site.

The Southern Area (south of the A453) is expected to be the principal focus for advanced manufacturing producing technology or using technology to deliver the net-zero transition. Following amendments to the LDO approved in May 2026 ([GNC4Ji](#), [GNC4Ki](#), [GNC4Li](#), [GNC4M](#)) this area is also identified as suitable for data centres. The LDO already allowed for data centres on areas to the north of the A453. The site's capability to accommodate these forms of development formed a key component of the very special circumstances that justified the grant of planning permission through the LDO on land that is still within the Green Belt.

There is benefit in locating an element of logistics uses on the site to support the local need for strategic distribution development, and particularly so if they can benefit from the site's existing rail line and sidings and/or they support the advanced manufacturing uses proposed on-site. However, in order to not undermine the vision for the site, the allocation and LDO seek to strike an appropriate balance by limiting the total quantum of logistics development allowed to a level that is proportionally much less than non-logistics uses on site (this being approximately 22% of the permitted floor area), and by restricting such uses to the Northern Area (north of the A453) where it would be much better located in respect of proximity to the site's existing rail connection.

Matter 2

Matter 3

Matter 4

Matter 5

Appendix Q12, Q52, Q76, Q77, Q81 (Porter Planning)

Question 12

Have the implications of the sustainable construction and design measures in Policy 1 for housing viability and affordability been robustly assessed?

Question 52

Are the requirements for the proportions of affordable housing and affordable housing tenures justified and viable?

Question 76

Does the viability evidence demonstrate that a 20% biodiversity net gain requirement is deliverable without undermining development viability in Rushcliffe, and how does the viability position differ in other parts of the Plan area? Are the cost assumptions reflective of current market conditions, including habitat creation, off-site unit values, and 30-year management requirements?

Question 77

Have the requirements of Policy 17 been factored into the assessment of the deliverability, capacity and viability of the proposed site allocations and other relevant sites in the housing supply? Should the policy include flexibility for developments that are unable to achieve the minimum 20% biodiversity net gain in Rushcliffe due to viability?

Question 81

Has the issue of viability been taken into account when seeking contributions for developments?

Technical Note

Job No.:	169 GNSP Examination
Note Title:	Responses to the MIQs Viability Related Questions
Date:	18/06/26
Prepared by:	Russ Porter, BSocSc (Hons), MA, GDip(QS), MRICS, Director at Porter Planning Economics Ltd

Introduction

1. This technical note provides Porter Planning Economics Ltd (Porter PE) working draft responses to the Inspector's Main Issues and Questions (MIQs) relating to the following:
 - Matter 2: Sustainable Growth, Issue 1: Climate change – Policy 1:
 - Question 12.
 - Matter 3: Places for People Issue 1: Housing size, mix, design and the historic environment – Policies 8, 10 and 11
 - Question 52.
 - Matter 4: Our Environment, Issue 1: Blue and green infrastructure and biodiversity – Policies 16 and 17
 - Question 76; and
 - Question 77.
 - Matter 5: Strategic Allocations, Issue 1: Developer contributions – Policy 18
 - Question 81.

Matter 2: Sustainable Growth

Issue 1: Climate change – Policy 1

Question 12: Have the implications of the sustainable construction and design measures in Policy 1 for housing viability and affordability been robustly assessed?

2. The viability implications of Policy 1 have been robustly assessed through Examination Document IN/5, Viability Study (Porter PE, September 2024), referred to herein as 'IN/5'. As set out at paragraphs 5.74 to 5.78 (page 54), the study explicitly tests the impact of enhanced sustainable construction and design requirements by applying additional cost allowances over and above BCIS benchmark build costs reflecting compliance with the 2021 Building Regulations (Part L carbon emissions standards).
 3. The cost uplifts applied in IN/5 are informed by Examination Document CC/3, Carbon Policy Support: Evidence Base (Bioregional, April 2024). The summary of costs (page 16) identifies the likely additional build cost requirements associated with achieving net zero (regulated operational carbon) standards. The following uplifts were applied within the viability testing:
 - 3% on top of BCIS build costs for new residential developments;
 - 2% on top of BCIS build costs for new office developments over 1,000 sqm;
 - 7% on top of BCIS build costs for new industrial developments over 1,000 sqm; and
 - 7% on top of BCIS build costs for other non-residential developments over 1,000 sqm.
-

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4. These assumptions were incorporated into the site typologies tested within IN/5, ensuring that the impact of Policy 1 requirements was directly reflected in the viability modelling.
5. Further validation of the reasonableness of these allowances is provided by the Government's Future Homes Standard: Final Stage Impact Assessment (published 24 March 2026), which accompanies the latest updates to Building Regulations (Approved Document Part L). The Future Homes Standard establishes a national framework for ensuring that new dwellings are 'net zero ready', targeting an approximate 75% reduction in carbon emissions relative to the 2013 Part L baseline from 2027.
6. The Government's assessment identifies additional capital costs per dwelling associated with achieving these standards, summarised in Table T1.1 below.

Table T1.1 FHS additional capital costs per unit

Type of dwelling	£ per unit	Applied to
Detached house	£5,160	All 4+ bed house dwelling types
Semi-detached house	£5,600	All 3-bed house dwelling types
Mid-Terraced house	£5,690	All 2-bed house dwelling types
Low Rise Flats (<11m)	£5,300	1-2 storey flats
Mid Rise Flats (<11m)	£2,210	3-5 storey flats, and Retirement & Extra care

Source: The Future Homes Standard: final stage impact assessment, published 24 March 2026

7. When these national cost estimates are expressed as a proportion of the base build costs assumed in IN/5 (which reflect 2021 Building Regulations compliant schemes), they indicate uplifts typically in the range of approximately 1.3% to 4.3%, depending on dwelling type. This comparison is set out in Table T1.2.
8. The analysis demonstrates that the 3% uplift applied to residential build costs within IN/5 sits comfortably within, and in most cases above, the range implied by the Government's evidence. Notably, the assumed uplift overestimates the additional cost for larger dwellings and broadly aligns with or exceeds the cost for smaller units and flats.
9. On this basis, the approach adopted within the viability testing can be considered appropriately cautious and robust. The inclusion of these uplifts ensures that the costs associated with delivering Policy 1 are fully internalised within the appraisal assumptions. Consequently, the viability evidence demonstrates that the implications of the sustainable construction and design measures have been properly accounted for, and that Policy 1 will not undermine the deliverability of development across the plan area when assessed in the round alongside other policy requirements.

Table T1.2 Test build costs and percentage increase to meet the FHS requirements

Tested dwelling type	Size per dwelling (sqm)	Tested build cost per dwelling at BR'21 excluding Policy 1 costs	Interpreted additional cost of meeting FHS based on the Government's impact assessment costs shown in Table T1.1 above
1 bed Flats (NIA)	45.0	£122,031	4.3%
2 bed Flats (NIA)	66.0	£178,978	3.0%
3 bed Flats (NIA)	85.0	£230,502	2.3%
2 bed house	75.0	£251,776	2.3%
3 bed house	93.0	£312,202	1.8%
4+ bed house	117.0	£392,770	1.3%

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Matter 3: Places for People

Issue 1: Housing size, mix, design and the historic environment – Policies 8, 10 and 11

Question 52: Are the requirements for the proportions of affordable housing and affordable housing tenures justified and viable?

10. The viability testing undertaken within IN/5 draws directly upon the latest Housing Needs Assessment (HNA), set out in Evidence Base Document HO/4 and referenced at paragraph 3.8.10 of the GNSP. This evidence establishes the objectively assessed need by dwelling size and tenure. In response, IN/5 develops representative site typologies and corresponding dwelling mixes, tailored to reflect realistic delivery scenarios including housing-led schemes, flatted schemes, and mixed house and flat developments. This approach is set out at paragraphs 3.12 to 3.14 (pages 20 to 21). All tested dwelling sizes are assumed to accord with the Nationally Described Space Standards (NDSS) at a minimum, ensuring that the resulting viability conclusions reflect compliant, policy-conforming development.
11. The assessment then tests a comprehensive range of affordable housing proportions and tenure mixes, taking into account the cumulative impact of relevant policy requirements. This includes CIL, Policy 1 (net zero carbon ready homes), Policy 8 (NDSS and accessibility), Policy 17 (biodiversity net gain), and benchmark Section 106 costs across the respective authorities. The results are presented in Chapter 7 of IN/5 (from page 70 onwards). This approach ensures that the affordable housing assumptions are tested in a fully policy-compliant context, consistent with national guidance in the PPG which requires plan policies to be assessed cumulatively.
12. The findings of the viability testing have informed the affordable housing proportions and tenure requirements set out in GNSP Policy 8. Overall, the evidence demonstrates that the proposed requirements are viable across the majority of typologies and geographical areas when considered in the round, and would not place delivery at serious risk.
13. In this regard, we note that sites, including the Stanton Tip Strategic Allocation site and some larger sites with 15 or more dwellings in Nottingham City's lower value areas may find it more challenging to achieve the GNSP Policy 8 requirements for 20% affordable housing in these locations. However, there are several factors that justify this position and provide confidence that delivery will not be unduly compromised. This includes the viability testing in IN/5 adopted prudent and, in some cases, conservative assumptions, especially regarding benchmark land values and developer profit margins. In practice, site-specific circumstances may support lower land value expectations or alternative delivery models, particularly on strategic or publicly controlled sites.
14. The testing does not assume the use of mechanisms such as Vacant Building Credit (VBC), which, where applicable, would reduce the effective affordable housing requirement and improve scheme viability.
15. The policy framework will be applied flexibly at the decision-making stage, with viability reviewed on a site-specific basis where necessary. This includes relooking at the affordable housing tenures to ensure that genuinely unviable schemes are not stalled, in accordance with national policy.
16. The 20% affordable housing requirement is carrying forward an existing policy approach which provides consistency to developers active in Nottingham.
17. Taking these factors into account, it is considered that the affordable housing proportions and tenure mix set out in Policy 8 are justified by the evidence base and are broadly viable across the plan area. Where viability constraints arise, there are sufficient mechanisms within the policy and decision-making framework to ensure that delivery is not prejudiced. The policy

Technical Note

therefore strikes an appropriate balance between maximising affordable housing provision in line with identified needs and maintaining deliverability.

Matter 4: Our Environment

Issue 1: Blue and green infrastructure and biodiversity – Policies 16 and 17

Question 76: Does the viability evidence demonstrate that a 20% biodiversity net gain requirement is deliverable without undermining development viability in Rushcliffe, and how does the viability position differ in other parts of the Plan area? Are the cost assumptions reflective of current market conditions, including habitat creation, off-site unit values, and 30-year management requirements?

18. The viability implications of Policy 17 have been tested within IN/5, which incorporates both the mandatory 10% BNG requirement across the GNSP area and the higher 20% requirement in Rushcliffe. These costs are included within all typology and strategic site appraisals to ensure a fully policy-compliant assessment.
19. As set out in IN/5 (paragraphs 5.19 to 5.20), the cost of delivering 10% BNG is treated as a standard development cost, based on the Government's Biodiversity Net Gain and Local Nature Recovery Strategies: Impact Assessment (DEFRA, 2019). The additional cost of increasing to 20% BNG in Rushcliffe is tested separately, applying the Government's estimate that doubling BNG increases costs by approximately 19%.
20. These cost assumptions reflect a mix of on-site habitat creation and off-site unit provision, together with long-term management costs typically over a 25–30 year period. This provides a proportionate and evidence-based representation of current market practice.
21. The viability results in IN/5 demonstrate that, once all policy costs are taken into account, the majority of sites remain viable. In Rushcliffe, the 20% BNG requirement has been tested alongside other policy requirements and does not undermine overall development viability across the bulk of sites. In the rest of the plan area, where a 10% BNG requirement applies, the cost impact is lower and the testing results show that this does not undermine overall development viability across the bulk of sites.
22. Overall, the evidence demonstrates that the BNG cost assumptions are appropriate and that both the 20% requirement in Rushcliffe and the 10% requirement elsewhere are deliverable without compromising plan viability.

Question 77: Have the requirements of Policy 17 been factored into the assessment of the deliverability, capacity and viability of the proposed site allocations and other relevant sites in the housing supply? Should the policy include flexibility for developments that are unable to achieve the minimum 20% biodiversity net gain in Rushcliffe due to viability?

23. As set out in response to Question 76, the requirements of Policy 17 have been fully incorporated into the viability assessment in IN/5. This includes testing both the 10% and 20% BNG requirements as part of the cumulative policy costs applied across a range of site typologies and strategic allocations, representing the housing supply. The results demonstrate that, in general, these requirements can be accommodated without undermining viability across the majority of sites.
24. As identified in IN/5 Chapter 2, the Planning Practice Guidance confirms that plan-making viability does not require testing of every individual site. Paragraph 003 (Reference ID: 10-003-20180724) is clear that plan makers can rely on site typologies, and that assessing samples of sites is sufficient to support robust evidence. So given that the viability results show that most tested schemes in Rushcliffe retain sufficient headroom after accounting for Policy 17

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and other requirement, then it is unnecessary to include flexibility to retest the viability of sites in Rushcliffe at the application stage.

25. This approach is in line with the NNPF 2024 and PPG on Viability, as identified in IN/5 chapter 2. For example, PPG Paragraph: 003 Reference ID: 10-003-20180724 notes:

“Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence”.

26. Overall, the evidence demonstrates that Policy 17 has been properly reflected in the assessment of site deliverability, capacity and viability, and that additional policy wording on flexibility is not required.

Matter 5: Strategic Allocations

Issue 1: Developer contributions – Policy 18

Question 81: Has the issue of viability been taken into account when seeking contributions for developments?

27. The issue of viability has been fully taken into account in assessing developer contributions through the whole plan viability work in IN/5. The study tests whether development can viably deliver the cumulative requirements of the GNSP, including infrastructure contributions secured through Policy 18.
28. In undertaking this assessment, all site typologies incorporate a comprehensive range of infrastructure cost assumptions, including:
 - External works and site-specific infrastructure costs, such as landscaping, access, and utilities connections, as set out in IN/5 (paragraphs 5.40 to 5.42);
 - Strategic site infrastructure allowances for larger greenfield developments, typically ranging from £7,500 to £20,000 per dwelling (paragraphs 5.25 to 5.29);
 - Adopted Community Infrastructure Levy (CIL) rates in relevant areas (paragraphs 5.63 to 5.64);
 - Section 106 contributions covering policy requirements including transport, green and blue infrastructure, education and health, based on evidence from historic agreements and local authority calculators (paragraphs 5.82 to 5.84);
 - An allowance for S106 contributions of 4% of non-residential build costs (paragraphs 7.15 to 7.16); and
 - Additional site-specific infrastructure costs for strategic allocations, informed by emerging heads of terms and local evidence, where available (e.g. Boots site testing at paragraphs 8.28 to 8.29).
29. These assumptions are applied alongside other key policy costs, including Policy 1 (climate change), Policy 8 (affordable housing and standards), and Policy 17 (biodiversity net gain), ensuring that the cumulative burden of contributions is tested in accordance with national policy and guidance.
30. The results of the viability testing demonstrate that, across the majority of typologies and locations, development is capable of supporting the required infrastructure contributions without undermining deliverability. As such, Policy 18 is informed by robust viability evidence.

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31. This approach is consistent with the NPPF (2023), paragraph 34, which requires plans to set out the contributions expected from development while ensuring that such requirements do not compromise deliverability. The evidence in IN/5 demonstrates that this balance has been appropriately achieved.

Matter 5

Appendix Q98, Q99, (Homes England)

Question 98

Is the proposed site allocation demonstrably viable and deliverable within the plan period?

Question 99

Is the revised housing trajectory (GNC4C) for the proposed site allocation at Broad Marsh justified, effective, and deliverable within the plan period?



Response to Karen Shaw (NCC Planning) on inputs required by Homes England for Local Plan Examination

Date: 11th June 2026

Following your request for input from Homes England on the Greater Nottingham Strategic Plan Examination in relation to Policy 25: Strategic allocation at Broad Marsh, Homes England are pleased to provide the below.

1. Homes England's strategic role in Nottingham and commitment to delivery

The regeneration of Broad Marsh has been identified by Nottingham City Council (NCC) as the city's principal strategic regeneration priority. Through close partnership working, Homes England has acquired the Council's landholdings and is now leading delivery of the scheme on site. The prioritisation of Broad Marsh reflects Homes England's place-based approach, focusing on locations with a clear vision for transformation, strong partnership alignment, coordinated investment, delivery flexibility, and proven technical capacity. These factors have established Nottingham as a priority location within the East Midlands.

Homes England has also partnered with the East Midlands Combined County Authority (EMCCA) through a Strategic Place Partnership (SPP), which aims to increase the quality, pace, and scale of housing delivery and placemaking across the region. As a Core City, Nottingham holds regional significance, and Broad Marsh is recognised within the SPP as a priority regeneration scheme for co-investment.

This collaboration has translated into tangible funding support. In addition to Homes England's existing investment to acquire and de-risk the site and the City Council's investment into earlier phases, EMCCA has committed £3.4 million towards early demolition works and continues to support the realignment of key arterial routes to facilitate delivery.

Strategically, Broad Marsh also aligns with the Trent Arc initiative, which seeks to establish a major growth corridor between Derby and Nottingham, integrating key development sites, existing communities, and new neighbourhoods within a coordinated economic framework.





A formal collaboration agreement between Homes England, Nottingham City Council, and EMCCA was completed in May 2026, strengthening governance arrangements and enabling accelerated delivery of the Broad Marsh scheme.

2. Homes England's response on Q98 Is the proposed site allocation demonstrably viable and deliverable within the plan period?

As set out in Homes England's [Strategic Plan 2025-2031](#), our mission is to harness our expertise, finding resources and influence to enable to the delivery of high-quality, safe and sustainable homes and vibrant, inclusive communities. Through collaboration with the housing sector and local leaders, Homes England are seeking to unlock housing and regeneration opportunities. Broad Marsh is a clear example of Homes England turning these ambitions into action on a key Nottingham regeneration priority.

Homes England has a strong recent track record of delivering complex inner city centre regeneration projects throughout the UK. Examples of projects elsewhere (with similarities to Broad Marsh) where we are heavily involved in undertaking de-risking activities and bringing sites forward for regeneration in partnership with developer partners include [York Central](#), [Bristol Temple Quarter](#) and [Sheffield Furnace Hill and Neepsend](#). Homes England's role is to enable the delivery of complex schemes that the market alone would not deliver, and we have the specialist capability and resource to deliver inner city centre regeneration.

Leading up to and following the acquisition of land within the Broad Marsh site in March 2025, soft market testing was undertaken with potential development partners. This generated clear interest in the delivery of regeneration proposals at Broad Marsh, although interest was contingent on Homes England undertaking a programme of enabling works, primarily focused on demolition and wider site de-risking activities. In response, Homes England has moved rapidly to progress these enabling works while simultaneously advancing the procurement of a development partner, who will ultimately be responsible for securing planning consent and delivering the regeneration of the site.

Working in partnership with NCC and EMCCA, Homes England is the principal landowner and lead investor in the planning and site de-risking works required to bring forward the regeneration of Broad Marsh. Homes England are at various points in the process of appointing demolition contractors to progress demolition works on site, alongside the appointment of a development partner.

Through the public sector funding and delivery of asbestos removal, demolition, site clearance, ground investigations, surveys and planning work, the partners will significantly improve the viability and attractiveness of Broad Marsh as a commercial development opportunity. The successful procurement of a development partner will itself act as a key indicator of the site

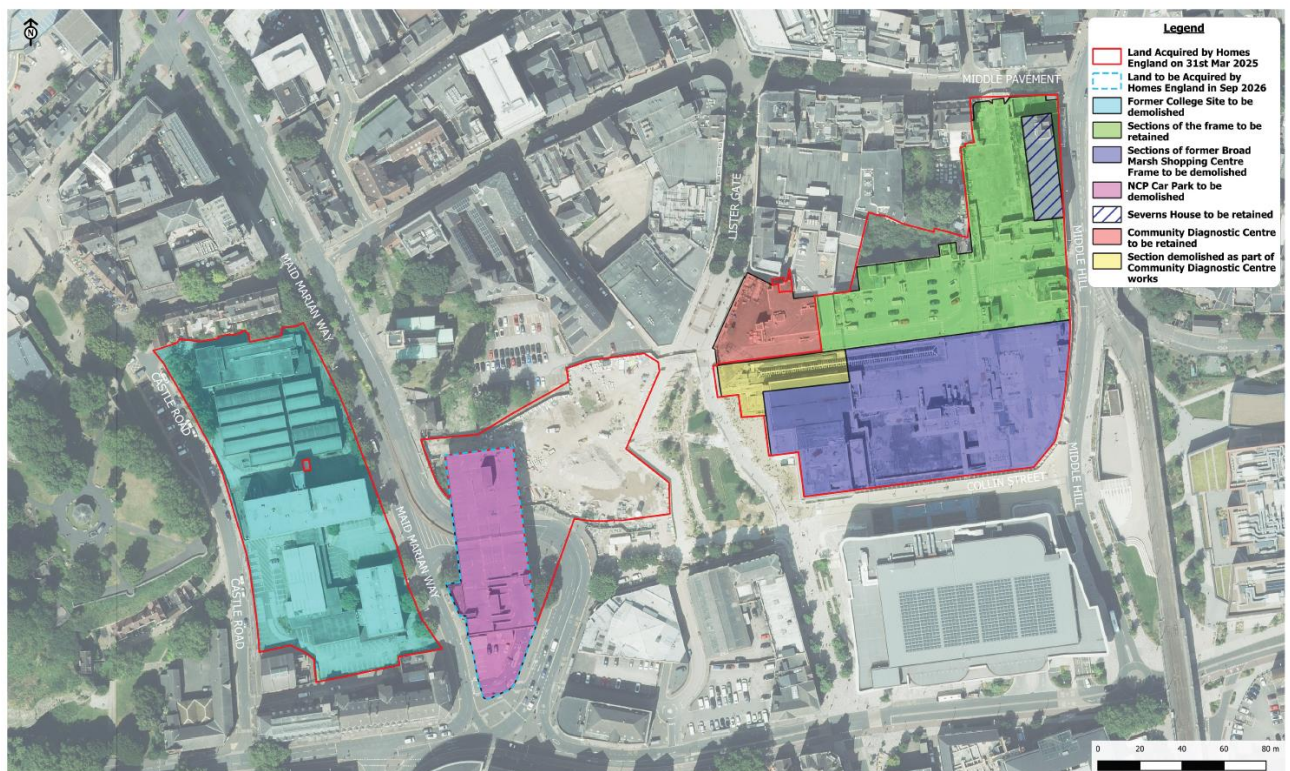




allocation's commercial viability. By addressing the substantial abnormal costs associated with demolition and site preparation at the outset, the scheme's internal rate of return and net present value are expected to improve considerably. On this basis, it is considered that the site allocation will be both viable and deliverable within the plan period.

Through previous rounds of commercial testing and market engagement, the BDP masterplan—while conceptual in nature—has been assessed as commercially sound (assuming a degree of public sector de-risking), providing a robust foundation upon which a future development partner can evolve and refine their designs. Feedback from developers indicated that the proposed mix of uses is broadly appropriate. Furthermore, it is anticipated that delivery would incorporate a range of residential tenures to meet local needs and affordability, including social housing and co-living. The scale of the Broad Marsh scheme supports the delivery of multiple tenure types and offers the flexibility to respond to prevailing market conditions as the project progresses towards implementation. The conceptual masterplan establishes a baseline development quantum, with developer feedback indicating potential to increase overall density, particularly through the delivery of additional residential provision. As such, the estimate of 1,000 residential units may represent a conservative assessment of the scheme's eventual output.

The plan below sets out the extent of Homes England's land and the different parts of our site.





The table below provides the latest position in relation to the demolition activities taking place/scheduled to take place across the site. All funds are in place to undertake this demolition.

	Demolition phase	Start date	End date
1	Demolition of the southern section of the Broad Marsh Shopping Centre	Demolition works commenced in May 2026	Scheduled for Spring 2027
2	Demolition of the former College Site*	July 2026	Autumn 2027
3	Demolition of NCP Car Park*	October 2026	Autumn 2027

* Dates subject to finalising the contract in coming weeks

In parallel with the enabling works to prepare the site for development, in May 2026 Homes England launched a preliminary market engagement exercise.

The aim is to secure feedback from the market to inform our formal procurement, where we will be seeking to secure a partner who will develop a new master plan for Broad Marsh, secure planning permission/s, and bring forward a multi-phase development. The key milestones for the procurement process are set out below:

	Procurement activity	Start date	End date
1	Request to participate phase	July 2026	September 2026
2	Invitation to tender issued and response period	September 2026	December 2026
3	Detailed tender stage	December 2026	May 2027
4	Contract award stage	May 2027	October 2027

Once the partner is selected, they will develop a new master plan for Broad Marsh and then secure hybrid planning permission (outline for the whole site with full planning for the initial phase/s). We anticipate the application would be submitted in Q2 2028.





3. Homes England's response on Q99 Is the revised housing trajectory (GNC4C) for the proposed site allocation at Broad Marsh justified, effective, and deliverable within the plan period?

At this stage, the housing trajectory has been developed based on the expertise and experience of the Homes England team with the aim of accelerating delivery of new homes at Broad Marsh as quickly as possible.

It is Homes England's view that the proposed housing trajectory is deliverable within the plan period, given the work that has taken place to date and is due to take place in the coming years to accelerate delivery of regeneration at Broad Marsh.

Once on board, Homes England will work with the master developer partner to refine the housing trajectory with the aim of improving upon this wherever possible.

