

Dear Sir/Madam

Wednesday, 19 January 2022

Please find enclosed the Greater Nottingham Strategic Plan - Consultation Response.

This relates to the item 6 on the agenda for Jobs and Economy Committee on Thursday, 27 January 2022 in the Council Chamber, Council Offices, Foster Avenue, Beeston NG9 1AB, commencing at 7.00 pm.

Yours faithfully

white Hyde

Chief Executive

CIRCULATION

6. <u>STRATEGIC PLAN UPDATE</u>

(Pages 3 - 140)

To update Members on progress with the public consultation on the Greater Nottingham Strategic Plan. The Greater Nottingham Strategic Plan - Consultation Response is circulated separately with this agenda. This page is intentionally left blank

APPENDIX

Greater Nottingham Strategic Plan - Consultation Response

Consultee	Representation Summaries
	Question INT1: Vision and Spatial Objectives
Resident	 Response expressed an interest in custom and self-build – particularly for land at the top of Toton in-between the houses and George Spencer Academy; the barracks; bottom Field of the Old scout campsite on Moor Lane Bramcote. The response also requested that the Council put aside land for custom and self-build development.
Resident	 Response noted that a priority would ideally be to include green corridors and green spaces as part of the urban planning e.g. to keep a green corridor for both wildlife and human social recreation needs between Beeston Rylands and the Boots Nottingham City development site.
Resident	 Regards that the Plan should note how to enhance access to Green Space for all but especially for those who currently have little.
Resident	 Regards that objectives should ensure that sustainable transport links new and existing development and that provision for active travel is facilitate and promoted.
Resident	 Suggests that free off-road parking should be provided by local authorities – which would benefit local businesses.
Resident	It was put forward that verges should be planted with wildflowers which would increase biodiversity, be visually attractive and pollinator-friendly (including bee-friendly) and have

	a low maintenance cost.
Resident	Regards that new roads should include cycle lanes.
Resident	Holds that there should be provision for electric vehicle charging points.
Resident	• Puts forward that verges should be planted with wildflowers as this would increase biodiversity (as well as being visually attractive with a low maintenance cost).
Resident	• Welcomes the inclusion of the principle of Net Environmental Gain. To achieve positive outcomes with measurable gains for biodiversity, this will need to be given sufficient weight alongside the other issues. The comment further regards that increasing biodiversity should not be restricted to new development projects only as there are many opportunities for incorporating biodiversity within other types of redevelopment and regeneration projects.
Resident	 Suggests that in terms of 'Climate Change causes, impacts and mitigation' that the opening chapter might consider ensuring that it is clear that emphasis is given to the following: Flooding and extreme rainfall Impacts of drought and heatwaves / hotter and drier summers Energy Use Pollution and air quality Overall impacts of urbanisation (in terms of its known correlation with the above points).
Resident	• Questions how the Greater Nottingham area will be impacted by Brexit, HS2 and COVID.
	Holds that Nottingham may become a commuter city and a tourist destination as well as a

	graduate city.
	 Tourism in terms of attractions, eateries and hotels need to be developed employing the greater population lesser intelligence residents.
Duty to Cooperate Council	 Proposes that an additional reference could be made to the opportunity to strengthen and develop linkages between Greater Nottingham and the adjoining Derby Housing Market Area.
Duty to Cooperate Council	 A clearer reference/statement is required to address and combine healthier populations with health inequalities in the wider population.
Duty to Cooperate Council	 Welcomes the consultation and the emphasis on sustainable development including Sustainable Urban Extensions on the edge of the Nottingham Urban Area.
	Clarity is needed as to whether Hucknall is part of the consultation area.
Duty to Cooperate Parish	 The number of new homes needs to meet the needs of future population growth, not just the existing population.
	 Should state Biodiversity Net Gain as well as Net environmental gain as per the draft Environment Bill.
	• There is nothing in the Vision about transport networks or other infrastructure to support population growth, and how this could be used to reduce the carbon footprint and affect climate change in a positive way e.g. through sustainable development, active travel etc.
Other Consultee	 Supportive of a comprehensive approach to strategic planning across the whole of Greater Nottingham. The strategic and comprehensive planning of Greater Nottingham should encompass Broxtowe, Erewash, Gedling, Nottingham, Rushcliffe and Hucknall area of Ashfield, however Figure 1.1 excludes Hucknall from the GNSP [Greater Nottingham Strategic Plan] area and inconsistent with the vision and spatial objective of achieving

	comprehensive strategic planning across Greater Nottingham.
	 This comprehensive approach should include the co-ordination of plan end dates, proposed Erewash Local Plan Review end date is 2037. Also necessary for future plan- making across Greater Nottingham to be carried out as expeditiously as possible. ACS [Aligned Core Strategies], the Rushcliffe Local Plan Part 1 Core Strategy and the Erewash Local Plan were all adopted in 2014.
Statutory Consultee	• The respondent supports the vision and objectives of the plan, especially the reference to the impacts of climate change and the mitigation of its impacts. The comment further suggests that is may be worth making specific reference to flood risk as part of the objective.
Statutory Consultee	 There should be overarching objectives to increase Natural Capital and address climate change Pleased to note that the following have been specifically identified: Causes of climate change and the mitigation of its effects Ensuring new development contributes to carbon neutrality Development supported by green and blue infrastructure. Suggest the objective of 'Ensuring new development provides net environmental gain including biodiversity' should also include "and contributing to the Nature Recovery Network". The objectives should also include protection for designated sites.
Other Consultee	 Seeks the improvement of the network of sustainable transport links for Active Travel within communities and between them. Also seeks the improvement of the green infrastructure network within communities and to the surrounding countryside to enhance health and well-being.

Landowner/Developer/Agent	 The response supports the commitment of the Vision and Spatial objectives – particularly regarding the economy and low carbon credentials. Considers that the Vision and Objectives should endeavour to provide alternative locations for the homes and business that will be displaced due to the construction of the HS2 route. Regards that Green Belt land should be re-assessed and those parcels which are unable to effectively contribute to the five Green Belt purposes (NPPF [National Planning Policy Framework] paragraph 134) should be released and allocated for development through the Local Plan review.
Landowner/Developer/Agent	 The reference to the need to provide a 'quantum of new homes' should be more closely aligned with the Government's objective of 'significantly boosting the supply of homes', as outlined in paragraph 59 of the NPPF [National Planning Policy Framework] and in light of the impact that COVID-19 will have on housing numbers (and the economy).
Landowner/Developer/Agent	 Should include how the Plan will respond to the lifestyle changes brought about by a desire for many to achieve a better work-life balance, technological developments and the impacts of Covid. Such changes are likely to result in people wanting/having more time available for recreational activities (including walking and cycling). Due to an increase in internet shopping there is a need for larger strategic as well as
	 smaller local distribution points. There will likely be a greater aspiration to live in houses with gardens and therefore a reduced demand for flats/apartments – and therefore a requirement for lower density development, and as such, more land to be made available for developments to create integrated neighbourhoods served by good infrastructure. The Plan will need to be customer focused and marker orientated to achieve high levels of design – one that reflects that characteristics of Greater Nottingham to ensure that the area does not become a replica of other towns and cities across the country.

	 Plan should be comprehensive (rather than piecemeal) to avoid difficult allocation decisions, often resulting in the release of minimum Green Belt land to meet development requirements.
Landowner/Developer/Agent	 The issues defined in paragraph 1.9 of the Greater Nottingham Strategic Plan (GNSP) Growth Option Consultation (GOC) are appropriate. We would however suggest that there should be an additional fourth bullet point, after reference to the quantum of new homes, which refers to the delivery and viability of housing development as follows "Ensuring new housing development is viable and deliverable and provides sufficient affordable homes to meet local needs".
Landowner/Developer/Agent	It is considered that the Visions and Spatial Objectives should provide clear support for connectivity and transport. Clearly the long-term functionality of any urban area is highly dependent on the ability of people to travel. Whilst Nottingham is not currently one of the most congested cities in the UK, key routes are becoming more congested, particularly during rush hours. Congestion has economic, social and environmental impacts, and thus an efficient and operational highway network, supported by high-quality public transport, will ensure Nottingham does not become congested whilst it grows. To ensure as few cars as possible on the highway network, new development should be located adjacent to existing services, facilities and employment, or close to new or planned transport infrastructure. Development should not be located in isolated locations, with poor connectivity and access to public transport, as this will increase car dependency and social exclusion.
	 This Plan should therefore place high importance on ensuring future residents can travel as efficiently and sustainably as possible, given the high social, environmental and economic benefits associated.
Landowner/Developer/Agent	The Vision and Spatial Objectives should also refer to the role of The University of Nottingham, as well as Nottingham Trent University, in supporting and delivering growth opportunities. The list of issues should be updated to include: "Ensuring the needs of both Greater Nottingham Universities are met, continuing to attract investment into the area".

Landowner/Developer/Agent	 No objections to the proposed issues to be addressed in the vision and objectives.
Landowner/Developer/Agent	 Considers that Erewash Borough Council should be included within this Strategic Plan so that their shortfall can be addressed by all of the HMA [Housing Market Area] authorities.
	• Statement of Common Ground should be produced between the HMA [Housing Market Area Area] authorities to document the cross-boundary matters being addressed and progress to date on how the authorities are cooperating.
Landowner/Developer/Agent	 Agree with the key elements of the Vision and particularly the need to ensure that growth achieves carbon neutrality or makes considerable inroads to this objective during the lifetime of the Plan.
Landowner/Developer/Agent	 Agree with the commitment to "Providing for economic development that generates sufficient new jobs, moves the economy to one with higher value, low carbon credentials and contributes to the economic recovery from the impacts of Coronavirus".
	 Greater consideration required to the release and subsequent development of Green Belt land that is unable to effectively contribute to the five Green Belt purposes as outlined in paragraph 134 of the NPPF [National Planning Policy Framework] 2019.
	 We propose that the disruption to homes and business by the proposed HS2 route is an issue facing the greater Nottingham area and that the Vision and Spatial Objectives should seek to provide alternative locations for the homes and businesses that will be displaced by the proposed HS2 route.
Landowner/Developer/Agent	 Agrees with the broad approach of the Vision and Spatial objectives, in particular the commitment to "Providing for economic development that generates sufficient new jobs, moves the economy to one with higher value, low carbon credentials and contributes to the economic recovery from the impacts of Coronavirus".

	 Propose that greater consideration is given to the release and subsequent development of Green Belt land that is unable to effectively contribute to the five Green Belt purposes as outlined in paragraph 134 of the NPPF [National Planning Policy Framework] 2019. Consider that such land should be released to meet employment land needs of the Greater Nottingham area during the plan-period. Consider that the proposed HS2 route has both physical and economic consequences to the area during the plan period and that the Vision and Spatial Objectives should seek to provide a more informed response to these issues both in terms of the Green Belt and the deliverability / need for employment land.
Landowner/Developer/Agent	 Regards that the Local Plan review must be concluded expeditiously in light of the fact extant policies were all adopted over five years ago without review. The objective to provide for housing that meets the needs of the existing population must also ensure account is taken for new population and economic growth projections for Nottinghamshire. The arrangements with regards Nottinghamshire Local Authorities Ashfield and Erewash is confused given neither authority has an up to date Local Plan. Further clarification on why these authorities do not figure within this Greater Nottingham Strategic Plan process is required.
	 The objective to provide the right types of homes to meet the needs of our diverse communities infers policy interference over market forces. Interventionist policies should be carefully considered to avoid introducing conflict between a perceived need and actual market demand. Lower value end uses imposed through policy intended to redress perceived housing market deficiencies may not be viable. Good growth through well designed homes and premises should be allied to build regulations. 'Future Homes' standards may emerge through the term of this plan which will impose new higher design standards. The plan should not seek to overstep its remit through the imposition of higher standards than those currently sort nationally through build regulations. Any such move must be evidenced to prove doing so will not harm the viability of sites.

Landowner/Developer/Agent	 Hold that the key matters on which decisions should be taken, should be: The need to decarbonise transport, the need to match development and infrastructure, provisior (utilising existing infrastructure where possible), The need to deliver new green space and biodiversity gains.
Statutory Consultee	• The historic environment is not mentioned and it would be useful for this to be included.
	Question INT2: Evidence Base
Resident	 A response notes that Broxtowe Borough Council have a number of additional documents which should be referenced (BBC [Broxtowe Borough Council] Social & Affordable Housing 2018; BBC [Broxtowe Borough Council] Green Spaces; BBC Broxtowe Borough Council] Playing Pitch Strategy). In addition, notes that Chetwynd: The Toton & Chilwell Neighbourhood Forum has completed a Neighbourhood Plan which would have been adopted but has been delayed due the COVID-19 and reference to this should be included.
Resident	 The Plan should consider growth proposals from Midlands Connect and Midlands Engine to ensure priority for strategic growth is given to Toton and the surrounding garden villages, and to coordinate appropriate infrastructure and service improvements.
Residents/Specialist Group	 The D2N2 [Derby, Derbyshire, Nottingham and Nottinghamshire Local Enterprise Partnership] Local Cycling and Walking Infrastructure Plan should be included in the evidence base, in view of its importance in defining the priorities for the future Cycling and Walking Network for the Greater Nottingham area (including Agreed Priorities) as should the three important new documents from the DfT [Department for Transport].
Residents/Specialist Group	Provides list of documents

Duty to Cooperate Parish	 Chetwynd: Toton & Chilwell should be included in the list of areas with emerging Neighbourhood Plans in Figure 1.2 under Broxtowe Borough Council.
	 It would be useful to know which of the studies in Figure 1.3 specifically identifies and maps populations of vulnerable flora and fauna and protects those populations and habitats.
	• The draft Environmental Bill needs to be added as the contents will set the tone and requirements for planning in the years ahead.
Duty to Cooperate Council	• The list of current and proposed evidence documents set out in the consultation document, to inform the Strategic Plan, is extensive and it is not considered that there are any obvious omissions to this list at present.
Duty to Cooperate Council	• States that there appears to be no evidence offered in terms of climate change, which given the objectives of the plan, seems something of an oversight. What might be the future impacts of a changing climate pertinent to this plan and what constraints do national and local commitments to reduce GHG [Greenhouse Gas] emissions place on it?
Duty to Cooperate Council	List of additional evidence suggested.
Statutory Consultee	 Evidence base additions suggested: - Humber River Basin Management Plan (RBMP) dated 2015. environmental dataset for the area (produced to support D2N2 [Derby, Derbyshire, Nottingham and Nottinghamshire Local Enterprise Partnership] strategic economic plan). Suggest meeting to discuss how this data can be used to support future growth options.
Statutory Consultee	 Raised concerns that some existing evidence was out of date and that some evidence is missing and will provide information which informs the discussion around Green

	Infrastructure. Any growth options should be considered against health impacts and the creation of healthy and active communities.
Specialist group	 Recommended inclusion of: Broxtowe Borough Council Green Infrastructure Strategy; Breathing Space - Revitalising Nottingham's open and green spaces (2010-2020) Report published by Nottingham City Council on 30/09/2013; Rushcliffe Nature Conservation Strategy 2015-20; Nottinghamshire Biodiversity Action Group Biodiversity Opportunity Mapping for Broxtowe, Rushcliffe and the Sherwood Forest area and 6CS [Derby, Derbyshire, Leicester, Leicestershire, Nottingham and Nottinghamshire] Green Infrastructure Strategy (2010)
Statutory Consultee	• The proposed main components of the evidence base set out in Figure 1.3 are noted. It should be recognised that separate to those main components, heritage impact assessments or equivalent analysis may be required at Plan stage should preferred sites be identified through the Plan as it progresses.
Statutory Consultee	 Suggest evidence should include the Nottinghamshire Biodiversity Mapping information and the 6C's [Derby, Derbyshire, Leicester, Leicestershire, Nottingham and Nottinghamshire] Green Infrastructure – or other up to date GI [Green Infrastructure] strategy information.
Other Consultee	 As set out in the NPPF [National Planning Policy Framework], all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. If policy requirement options such as optional technical standards and / or prescriptive housing type / tenure mixes are to be pursued, detailed additional evidence to support and justify such policy requirements should be gathered.
Other Consultee	States that the below are required:

	 Analysis of the impact of Covid-19 on Greater Nottingham. Withdrawal of the current 'Growth Options Study' as out of date and redraft. Update Landscape Character Assessment and Green Belt Review. Register of Brownfield Land
Local/Specialist Group	 Suggests that Planning for the Future, Open Consultation, 6 August 2020; Nottingham City Council Carbon Neutral Charter and draft Carbon Neutral Action Plan cn2028; and City of Nottingham Design Guides, could be referred to.
Landowner/Developer/Agent	• The evidence base should include an up-to-date Green Belt Review as the referenced document was undertaken in 2006 and is significantly flawed. The preparation of the Strategic Plan provides an opportunity to review and amend Green Belt boundaries in accordance with the provisions of the National Planning Policy Framework ('NPPF').
Landowner/Developer/Agent	 The Nottingham - Derby Green Belt Review 2006 requires an update as it does not acknowledge the influence of HS2 on the Green Belt.
Landowner/Developer/Agent	• We consider that the evidence base for the GNSP [Greater Nottingham Strategic Plan] should be extended to include a unified housing trajectory and information on housing supply for the five authorities against housing requirements for the Plan area. This should include regular assessment and information on the delivery of key strategic sites. We consider this would assist in monitoring the implementation of the Plan.
Landowner/Developer/Agent	• The evidence base for the Greater Nottingham Strategic Plan should include an update to the Nottingham – Derby Green Belt Review. Notwithstanding the common methodology used by the individual authorities for the Part 2 Local Plans, this methodology and approach stemmed from the Green Belt Review in 2006. An up-to-date, holistic review is necessary to effectively deliver 'new' and future housing growth requirements. The preparation of a Strategic Plan sets a realistic environment for a Green Belt Review, in accordance with the National Planning Policy Framework.

Landowner/Developer/Agent	• No, we are content that the evidence base is sufficient to inform the plan. However, it is not clear where the impacts and potential of HS2 have been accounted for in the evidence base. Also the need for a local nature recovery network that identifies how and where proposals might be directed to enhance and restore biodiversity across the Plan area and period.
Landowner/Developer/Agent	• UK Government publications highlight the weight to be attached to delivering development in a sustainable way that helps meet wider ambitions to help address the challenge of climate change. The 'Decarbonising Transport: Setting the Challenge' document (March 2020) outlines the importance of access to good public transport and active travel options (walking and cycling) to help meet people's needs, improve mobility and also reduce Greenhouse Gas (GHG) emissions. In addition, the 'Planning for the Future' White Paper (August 2020) proposes a new 'sustainable development' test to ensure Local Plans strike the right balance between environmental, social and economic objectives.
Landowner/Developer/Agent	 The evidence base is already very comprehensive. Although some of the studies may appear dated most are still relevant today and do not need updating. However, there are a number of issues that need to be addressed: Requirement for strategic multi modal transport assessment studies along transport corridors where significant growth is likely such as along the Mansfield Road (A60) corridor (we note that NCC [Nottinghamshire County Council] Highways has recently commissioned such a study). Such studies should involve landowners/developers who may have already undertaken preliminary transport studies and have ideas about potential innovative solutions. Interested landowner/developers should also be invited to advise on the scope of such studies;
	Assessment of emerging lifestyle changes and how these changes are likely to impact on land use planning policies, proposals and also priorities for infrastructure

	improvements.
	• On the other hand, there should be no need for the authorities to commission studies to determine future housing requirements as the government has indicated that they will provide these figures to the local planning authorities using the standard methodology. As such the plan will be able to focus on the pattern and distribution of development and infrastructure requirements.
Landowner/Developer/Agent	• Considers that the Green Belt study is date and should be updated and should address the proposed route of HS2 which could provide a new defensible and permanent Green Belt boundary.
	 It was also noted that an urban capacity assessment should be undertaken for the Greater Nottingham authorities in order to demonstrate whether there are enough brownfield sites to meet housing needs.
Landowner/Developer/Agent	• A detailed Green Belt review is required of all neighbouring Nottinghamshire Local Authorities where prescriptive market housing mix or increased build standard policies are sort further evidence must be provided to support and justify such requirements. The Standard Methodology employed to determine Local Housing Need must be updated to conform to current government guidance which is presently subject to consultation.
Question INT3: Strategic Issues	
Resident	 The plan should consider the growing trend towards increased city centre living and growing density in the city, to reduce the pressure for urban extensions. The plan should detail how to increase vibrancy and diversity of use within the city and look to international comparisons.
Resident	• Regards that a main issue is the access to the proposed development at B09.1. Also notes that the junction of Blake Road / Toton Lane is already heavily congested at certain times of the day, with vehicles being parked inconsiderately. Sisley Avenue is not wide

	enough for the amount of vehicles that it has to service. Due to the number of new dwellings, the area would have to be provided with a bus service. This is the last piece of farming land in Stapleford.
Resident	 If a Development Corporation is created for the Toton Area Development, then Policies 14 & 15 of Aligned Core Strategies should apply equally to the area under the control of the Development Corporation.
Resident	 Another strategic issue will ideally be to include green corridors and green spaces as part of the urban planning.
Resident	Queries the inclusion of Coastal Change
Resident	Regards that Aligned Core Strategies Policies 14 & 15 should be retained.
Residents/Specialist Group	 Decarbonising transport and other significant behavioural adjustments necessary to meet carbon neutral targets are strategic issues implicit in the detail of much of this strategic planning exercise that might be given more prominence.
Residents/Specialist Group	 It should be made clear that infrastructure for transport should include that for active travel, particularly in view of the 3 important new DfT [Department for Transport] documents which we have suggested should now be included in the evidence base.
Residents/Specialist Group	• The final bullet point of Paragraph 1.17 quotes NPPF [National Planning Policy Framework] Paragraph 20 in relation to requirements of a strategic plan, as follows: 'Climate change mitigation and adaption, and conservation and enhancement of the natural, built, and historic environment, including landscape and green infrastructure'
	It appears the bullet points are based on but not direct quote from NPPF [National Planning Policy Framework] (February 2019), which actually lists GI [Green]

	Infrastructure] before Climate Change:
Duty to Cooperate Council	• The proposed Strategic Issues proposed to be taken into account in the preparation of the Strategic Plan are extensive and it is not considered that there are any obvious omissions to the proposed issues.
Duty to Cooperate Council	List of documents provided.
Duty to Cooperate Parish	Modern Methods of Construction should be used to minimise disruption.
	• The use of Area Development Orders to set out the timeline and order of build out of development would be beneficial.
	• The strategic importance of public health in the planning for green space, both quality and quantity (see A new review for 2020 - Public Health England March 2020).
	• The minimum requirements for a strategic plan should include the 10% biodiversity net gain.
	There is no mention of the HIF [Housing Infrastructure Fund] Bid for the Toton SLG/EM [Strategic Location for Growth / East Midlands] Hub Station.
Statutory Consultee	 Queries whether the plan should define what is meant by 'strategic infrastructure' more that given in paragraph 9.9 is this provision of new? Or protection (enhancement) of existing. Is this a location driven definition or size of facility? Or importance to growth? Q INT3
Statutory Consultee	• Strongly recommends that the Plan considers flood risk across the whole area, rather than in local patches and geographies. Further suggests that flood risk should be tacked as a standalone strategic issue as part of the forthcoming Plan.

The Nature Recovery Network should be considered within the Strategy.
• Severn Trent note that part of the vision for the Greater Nottingham Strategic Plan is to develop in a carbon neutral way, minimising the impact of development on the environment. Severn Trent are supportive of this approach and are looking at our own process to become carbon neutral as a business. However due to the nature of our business the treatment of water for consumption and treatment of wastewater, there will always be process that need to be carried out that utilise vital resources including energy. We would therefore highlight that delivery of Water Efficient properties can also result in carbon benefits through the reduced need to process water and treat waste.
• Whilst section 1.17 details Water supply and wastewater, and we would support their inclusion within this section of the plan. It is felt that appropriate management of resources such as water is also important and should be included within the context of paragraph 1.17
• The strategic issues outlined are consistent with the 2019 NPPF [National Planning Policy Framework] (para 20). Any implications arising from the Covid-19 pandemic should be taken into consideration as a strategic issue.
• Note that Rights of Way are a key part of the Highway system with a very high cost-benefit ratio. Further notes that improving the Active Travel network (walking/running, cycling, horse-riding) must be an important component of transport infrastructure.
 Recognise the benefits of the new HS2 Hub, however, considers that the Growth Options Consultation Document only recognises the implementation of its station. The document does not recognise the new permanent boundary created by the railway and its potential to create a new urban edge. Furthermore, wider employment growth, in the Class B2 / B8 (E Class) sectors of the market, represent a strategic issue for the conurbation. Indeed, the City area has been short of high quality Class B2 / B8 (E Class) land for many years given the constraints of Green Belt.

Landowner/developer/agent	 In relation to 'climate change mitigation and adaptation' it should be noted that the NPPF [National Planning Policy Framework] (para 20) only refers to "planning measures to address climate change mitigation and adaptation". Proposals which are not planning measures should, therefore, not be included.
Landowner/developer/agent	We consider the defined strategic issues to be appropriate
Landowner/developer/agent	 In determining what is Sustainable Development, there is a need to identify explicitly how this is determined and the weight put on each of the environmental, social and environmental objectives
Landowner/developer/agent	Clear advantages to comprehensive approach to strategic planning across the whole of the Greater Nottingham area, including Erewash.
Landowner/developer/agent	• We consider that the Growth Options Consultation Document fails to recognise the new permanent boundary that will be created between Broxtowe and Nottingham City by the new HS2 route. We consider that this is due to focusing on the benefits of the station/ hub rather than the railway line and its effects on the landscape.
Landowner/developer/agent	 Other strategic issues should include 'the homes needed for older persons' due to 1 in 4 of the population being over 65 by 2035 and the need for purpose built accommodation for older people to be delivered, particularly extra-care (C2 use class). National policy recognises the critical need for this.
Landowner/Developer/Agent	 Spatial design implications posed by the current COVID-19 pandemic should be taken into account when considering strategic allocations.
Question OS1: Urban Intensification Growth Strategy	

Local Resident	• Growth should largely be focused within the urban area, where transport accessibility is high and infrastructure and amenities are well provided. Where edge developments, urban extensions or co-dependent settlements are considered, this should only be supported where there are significant transport improvements.
Local Resident	• The Greater Nottingham Area should focus on building upwards due to limited space (specifically business and office development). Considers that Broxtowe should build on the gap between Ilkeston and Strelley as well as the HS2 area.
	All of the M1 junctions should have industrial and warehouse estates for job creation.
Local Resident	 Urban Green Spaces should be maintained as they are vital for recreation, well-being and wildlife. Development should therefore be elsewhere.
Local Resident	• Agree with urban intensification strategy and acknowledge new employment opportunities e.g. Ratcliffe Power Station, East Midlands Hub.
Local Residents	• A number of residents note that growth should be focused in and adjacent to the urban area as far as practical.
Local Resident	Vacant buildings should be re-used.
Residents/Specialist Group	• Objectives should include ensuring that sustainable transport links new and existing development and that provision for active travel (cycling and walking) is facilitated and promoted, for both utility (commuting, educational and shopping trips) and leisure use.
Residents/Specialist Group	 Support urban intensification but small-scale housing developments are likely to be needed in smaller settlements to meet the need for affordable housing and create well- balanced rural communities. It is likely that brownfield sites will become available in the urban area, which can then be used for housing and local amenity. An urban intensification strategy needs to be combined with the Green and Blue Infrastructure-led Growth Strategy Option and the right kind of transport-led strategy. Plan to avoid potential

	negative consequences of urban concentration such as an increase in air pollution or the loss of urban green spaces.
Residents/Specialist Group	• Applying an urban intensification approach could mean that parts of the city would lose, in many cases, popular, highly valued and high quality (in terms of value to people and wildlife) open spaces and wildlife sites.
Duty to Cooperate Council	NCC [Nottinghamshire County Council] Education's preference is for an urban intensification growth strategy.
Duty to Cooperate Council	• In considering the options for growth in the Strategic Plan area, the potential for further development within the northern part of Broxtowe Borough is most likely to impact on Amber Valley, given the common boundary between the two local authority areas.
Duty to Cooperate Parish	• An impact assessment should be undertaken in each urban area affected.
Statutory Consultee	• Any growth options should be considered against health impacts and the creation of healthy and active communities. This plan provides a significant opportunity to allocate land for housing development in appropriate locations to create sustainable communities where active travel is enabled.
Statutory Consultee	• A strategy based on urban intensification would need to ensure heritage assets and setting are conserved or enhanced. Opportunities for heritage led regeneration could be identified within the Plan.
Statutory Consultee	 Natural England does not have a particular preference for either of the above growth strategy options (OS1 & OS2) but the chosen approach should result in no adverse impact on any designated nature conservation sites or protected landscapes. Any strategy option should also consider the evolving Nature Recovery Network and avoid Best & Most Versatile Land.

Statutory Consultee	 There needs to be a strong policy in place to preclude development in areas at high risk of flooding or functional floodplain unless it demonstrably reduces existing levels of flood risk. The future requirement to deliver biodiversity net gain as part of any new major development may not be feasible if the majority of development is restricted to urban areas.
Statutory Consultee	Generally supportive of this approach and consider that it would locate growth within targeted areas, delivering greater certainty around where development will occur. Note that additional benefits could be achieved through brownfield redevelopment.
Landowner/Developer/Agent	• Concur that the eventual growth strategy should be a combination of the approaches including OS1: Urban Intensification Growth Strategy, OS2: More-Dispersed Growth Strategy and OS4: Transport-Led Growth Strategy.
Landowner/Developer/Agent	• Support this growth strategy to direct growth adjacent to the urban area and the focus should be to deliver housing adjoining the Nottingham Main Built Up Area. Agree with the positive impacts listed in Figure 2.1 and consider that development adjacent to the existing urban edge will ensure that development is delivered in an accessible location in proximity to existing services and facilities. In regards to the potential negative impacts, development adjacent to the urban area does not necessarily need to be delivered as large Strategic Urban Extensions, medium / large sites could be suitable alternatives and have a less impact on existing service capacity.
Landowner/Developer/Agent	 Welcome the recognition that additional dwellings can be allocated at Chetwynd Barracks and form part of the housing supply for Broxtowe Borough over the forthcoming plan period. The Barracks, in its entirety, is capable of contributing to the supply of new homes in Broxtowe. Homes England/DIO [Defence Infrastructure Organisation] seek its allocation in the Strategic Plan and confirm that it will deliver further development beyond the 500 dwellings allocated in BBC's LP Pt2 [Broxtowe Borough Council's Local Plan Part

	2].
	• As a previously-developed site in the main urban area, the redevelopment of Chetwynd Barracks is capable of supporting the Urban Intensification Growth Option referred to in Section 2 and Question OS1. The site provides an opportunity for transport network improvements and its proximity to the planned HS2 station and associated strategic growth site at Toton, means that it is also capable of contributing to the Transport-Led Growth Option referred to in Question OS4.
Landowner/Developer/Agent	 A balanced strategy is required which makes provision for growth within and adjoining the main urban area, the key settlements and at other villages, including also along transport corridors/around transport hubs. Significant provision will also need to be made for growth around key settlements which have a good range of services and which have potential to grow. In addition, other villages should also be expected to accept additional development over and above just meeting local housing needs.
Landowner/Developer/Agent	 The introduction of HS2 to the west of Nottingham will create a new defensible boundary and significantly change the character of the existing Green Belt.
Landowner/Developer/Agent	Note that urban intensification should not be limited to the main Nottingham Urban Area.
Landowner/Developer/Agent	 A strategy of urban expansion with large scale SUEs [Sustainable Urban Extensions] has proven to be undeliverable. With the notable exception of Clifton, other large urban extensions have been difficult to bring forward and there is limited availability of deliverable brownfield land. The B09 is categorised as an Urban Extension and growth here is supported. An appropriate balance of urban expansion and a more dispersed growth strategy option is needed.
Landowner/Developer/Agent	 While there is no objection to the intensification of the existing urban area, questions are raised regarding the ability of this strategy to meet the full housing requirements of the conurbation. There are doubts about whether sufficient deliverable sites are available to meet the identified need. Following the pandemic there is also likely to be a change in the type of properties needed. Future properties are likely to require more external green

spaces and internal space.
• Suggest that the GNSP [Greater Nottingham Strategic Plan] could and should incorporate elements of all four spatial strategy options to realise sustainable development in the Greater Nottingham area and ensure that the GNSP's [Greater Nottingham Strategic Plan's] vision and spatial objectives are actually achieved.
• Wholly supports the urban intensification growth strategy, which seeks to focus development within and adjoining the Nottingham Main Built Up Area and support the allocation of land immediately to the north of a recent residential allocation in the Broxtowe Local Plan - Policy 3.4 Stapleford (west of Coventry Lane). The site (located within the Broxtowe South area) is not identified as having been considered by the growth options study.
 Growth needs to be located in and adjacent to the city. Some proportionate growth should also be distributed to settlements to support the sustainability of individual settlements. There may also be potential for strategic scale growth in a few new locations with excellent transport connections and the potential for economic growth, e.g. Toton HS2 gateway, and Radcliffe on Soar Power Station. The wider dispersal of growth is not supported.
• Our view is that the majority of growth needs to be located in and adjacent to the principal urban area of the city. The city offers the greatest economic potential and critical mass or economic activity, and provides higher-order services to serve the wider city-region that are not met elsewhere, such as hospitals and the Universities. Locations in and adjacent to the city offer the most sustainable locations to reduce carbon emissions with much greater opportunities to walk and cycle to local facilities and work, and to meet existing social and economic needs and address deprivation, which is concentrated within the urban area.
 Urban intensification has long been regarded as a component part of growth strategies. However, because this objective has been pursued for some time already, its potential has largely already been realised and there is now very limited capacity to supply further housing from this strategy.

Landowner/Developer/Agent	environment and detriment to resident's sense of wellbeing. Urban intensification strategies may further exacerbate a reduction in the variety and house types available on the open market.
	 A Green Intensification approach for cities would introduce greener, healthier and cleaner living standards for city and suburban residents. Offsetting is intended to address, abate and reinstate lost habitats which are most needed within urbanised areas. An urban intensification growth 3 strategy may therefore come into conflict with emerging environmental law aimed at protecting valued habitats.
Landowner/Developer/Agent	• Propose a mixed strategy which promotes accessible development and retain green space. There should be a focus on growth where there are existing or planned transport improvements.
Other Consultee	Agree with urban concentration but excluding further SUEs [Sustainable Urban Extensions]. There is a need for a full analysis of brownfield sites and buildings to repurpose in the Nottingham City area in particular. This is likely to yield more small and medium sites which are more attractive to SME [Small and Medium-size Enterprise] builders and in line with Government policy. Concern that SUEs [Sustainable Urban Extensions] have high deliverability risks, and are unsustainable in a number of ways.
Other Consultee	 The GNSP [Greater Nottingham Strategic Plan] should ensure the availability of a sufficient supply of deliverable and developable land to deliver Greater Nottingham's housing requirement. There are disadvantages to pursuing any proposed Growth Strategy Option in isolation. The Urban Intensification Growth Strategy Option is unlikely to meet all development needs due to the restricted capacity of the urban area and insufficient availability of brownfield sites. Higher densities are only appropriate in certain locations. The setting of residential density standards should be undertaken in accordance with the 2019 NPPF [National Planning Policy Framework] (para 123) The preferred Growth Strategy of the GNSP [Greater Nottingham Strategic Plan] is most likely to be a combination of two or more proposed Growth Strategy Options therefore urban intensification should be considered as part of a combination of proposed Growth Strategy Options.
	Development concentrated in and around urban areas is a good option as it encourages

Other Consultee	active travel and is better for the environment. There will be a need for regeneration post- COVID.
	• The pandemic has highlighted the benefits of access to green spaces, and it is vital that people who live and work in high-density urban areas are within easy reach of open spaces and green corridors with all the positive effects on physical and mental health.
Question OS2: More-Dispersed Growth Strategy Option	
Resident	 Disagree with dispersed growth strategy. Provision of affordable housing should be constructed alongside market housing and should not depend on high value land. Further notes that new ways of working post-Covid should result in more housing built close to workplaces.
Resident	 Homes in Beeston and Toton should include more apartment blocks as it is ideally suited to the enterprise zone, QMC [Queen's Medical Centre], University, HS2. However, the response does not support new housing around Eastwood.
Resident	 Home working supports a More-Dispersed Growth Strategy Option as it prevents development on already pressured urban green space and corridors.
Resident	Holds that the negative impacts in Fig 2.2 strongly outweigh the benefits.
Resident	 The More-Dispersed Growth Strategy is an undesirable option, so Broxtowe Borough Council, Gedling Borough Council, Nottingham City Council and Rushcliffe Borough Council should focus growth inside and adjacent to the Nottingham Urban Area as far as practical, rather than opting for more dispersed growth. Toton, which is on the periphery of the Nottingham Urban Area, is one exception to this, and Toton should be expanded.
Resident	Rural development should be limited.

Residents/Specialist Group	• Notes that each site needs to be reviewed individually so it isn't really possible to support either urban intensification or a more dispersed model.
Residents/Specialist Group	• Generally, do not favour this option because potentially longer commuter journeys will be less likely to encourage active travel with adverse consequences for climate change, especially in the case of settlements without good public transport services.
Duty to Cooperate Parish	• Regards that there needs to be a mixed approach for both urban and 'dispersed' growth, as far as is possible/practical bearing in mind the likely negative impacts listed on the environment of the area(s) chosen which should be mitigated to minimise the impact on local communities. An impact assessment should be undertaken in each area affected.
Duty to Cooperate Council	Preference is to minimise dispersed growth in favour of an urban intensification strategy.
Duty to Cooperate Council	• The potential for further development within the northern part of Broxtowe Borough is most likely to impact on Amber Valley, given the common boundary between the two local authority areas. Any significant growth in this location could have economic benefits to Amber Valley residents, linked to improvements in transport infrastructure along the A610 corridor.
Statutory Consultee	 Do not wish to raise any specific comments on the growth options but take the opportunity to request that any growth options are considered against health impacts and the creation of healthy and active communities.
Statutory Consultee	Would like to ensure that the chosen approach results in no adverse impact on any designated nature conservation sites or protected landscapes.
	• Any strategy option should also consider the evolving Nature Recovery Network as it would be very disappointing to see key areas of potential habitat expansion and connection allocated for development. We would also advise that housing development should avoid Best & Most Versatile Land (BMV) where possible.

Statutory Consultee	 Whilst this approach would reduce the certainty of where and when development will occur, the likelihood of longer development timescales may help to support the assessment and development of any necessary infrastructure upgrades.
Statutory Consultee	 A strategy based on dispersed growth, expanding settlements or developing new settlements within or beyond the Green Belt would need to ensure heritage assets and setting are conserved or enhanced. Opportunities for heritage led regeneration could be identified. Green Belt developments could potentially harm heritage assets and the Plan would need to consider this as it progresses.
Other Consultee	 Development needs to be concentrated, but with some dispersion to allow the protection of essential urban green spaces and links to the countryside. Everyone should be able to access quiet green space with good air quality. This requires the preservation of 'green lungs' and re-greening of the urban landscape, plus retaining green corridors to open countryside.
Other Consultee	 Considers that there may be a case for limited expansion of individual settlements in order to maintain local services in line with para 78 of the NPPF [National Planning Policy Framework]. Disagree that Site R15 - A453 Corridor is an area of 'High Potential for Strategic Growth'. This assertion is unsupported by any robust evidence and analysis and fails to take account of the potential negative impacts of such an approach identified in Figure 2.2. The Ratcliffe on Soar power station is set to be decommissioned and replaced with an incinerator. Given Greater Nottingham's desire to limit the carbon impact of development, it would be counter intuitive to create an autonomic settlement around an employment use that contributes towards large-scale carbon release.

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Other Consultee	• The possible proposal for a new garden community would have a long lead in time, which should be complimented by smaller non-strategic housing allocations in the short to medium term to ensure a continuous HLS [Housing Land Supply]. The preferred Growth Strategy of the GNSP [Greater Nottingham Strategic Plan] is most likely to be a combination of two or more proposed Growth Strategy Options therefore more dispersed growth should be considered as part of a combination.
Landowner/Developer/Agent	• Do not support a wide dispersal of growth as this is less sustainable and would generate higher levels of CO2 [carbon dioxide] emissions through transport and fail on other objectives, such as addressing economic and social disadvantage.
Landowner/Developer/Agent	• Are in support of a more dispersed growth strategy which provides development in locations where HS2 compromises the integrity of the Green Belt to the west of Nottingham. Furthermore, these areas which lie within close proximity to the existing urban area should be able to provide sustainable development opportunities to enhance existing infrastructure.
Landowner/Developer/Agent	• Whilst the site and other general ambitions of the strategy are supported it is the landowners view that it is inappropriate to seek to determine a strategy based on a single defined 'growth option'. The landowner considers that the Greater Nottingham Authorities should adopt a mixed strategy but which as a key element of its strategy, promotes accessible development which can also help retain and enhance green space for the benefit of communities.
Landowner/Developer/Agent	 It is important to have a pragmatic approach to development with a more dispersed approach allowing development to be located across the region rather than concentrating it on the existing urban areas. This will allow a greater number of areas across the borough to benefit from the local economic growth generated from new housing developments.
Landowner/Developer/Agent	• To meet the emerging housing requirement in the Greater Nottingham Plan, particularly in light of the relatively poor rates of housing delivery across the Plan area, it will be necessary to distribute housing to a range of sites including urban extensions, new

	settlements and village extensions. It will be necessary to consider the growth attributed to each of these options against the capacity of these areas to accommodate growth, particularly where there is existing allocations and commitments.
Landowner/Developer/Agent	• A more dispersed development approach should be adopted. This can be facilitated through the release of land to the south and east of the city that fails to fulfil the purpose of Green Belt designation. It must be questioned whether now, in the short term, is the right time to be progressing this Growth Strategy, especially given the governments white paper which will significantly influence Development Plans going forward. Perhaps it would be opportune, to take a step back and see where the Government is going to go!
Landowner/Developer/Agent	• The GNSP [Greater Nottingham Strategic Plan] must "provide a clear strategy" to ensure that a "sufficient amount and variety of land can come forward where it is needed" (NPPF [National Planning Policy Framework] para 23 & 59) in order to facilitate a continual supply of market and affordable housing to address identified needs. To that end the GOCD [Growth Options Consultation Document] sets out four spatial strategy options. However, rather than seeking to rely on just one of those strategies, the GNSP [Greater Nottingham Strategic Plan] could and should incorporate elements of all four to realise sustainable development in the Greater Nottingham area and ensure that the GNSP's vision and spatial objectives are actually achieved.
Landowner/Developer/Agent	 We support a more dispersed growth strategy which provides development in locations where HS2 compromises the integrity of the Green Belt to the west of Nottingham. Furthermore, those areas which lie within close proximity to the existing urban area should be able to provide sustainable development opportunities to enhance existing infrastructure.
Landowner/Developer/Agent	• The 'More Dispersed Growth Strategy Option' is the preferred strategic growth option for Greater Nottingham. With reference specifically to housing, whilst the Nottingham urban area can accommodate additional quantums of housing there are key settlements in Broxtowe, particularly Awsworth, that are capable of accommodating additional housing

	numbers in a sustainable manner.
Landowner/Developer/Agent	 Due to changing lifestyles it is inevitable that a more dispersed pattern of development should be planned for, combined with lower density living in the main urban area. This will mean providing more land for development adjoining the main urban area, along transport corridors/transport hubs and at key settlements and villages. However, we are opposed to new settlements/villages (populations of 10,000 have been suggested) due to their long lead in times.
Landowner/Developer/Agent	 Suggest that this option should be retitled 'settlement expansion growth strategy option" as the word "dispersal" has negative connotations and is not accurate. We therefore consider that the expansion of existing settlements as well as new settlements, is a sustainable component of the GNSP [Greater Nottingham Strategic Plan] spatial strategy. However, this option should not include development beyond the Green Belt, which would be too remote from the Nottingham urban area.
Landowner/Developer/Agent	• The second proposed strategy is OS2: More-Dispersed Growth Strategy. This strategy would seek to deliver growth to a wider area, including the delivery of growth in the smaller towns and settlements, not adjacent to the Nottingham urban area. This option includes the potential to deliver a new free-standing settlement in the form of a free-standing 'garden community'. There is however no indication of where such a settlement would be located, or what factors would be considered when choosing such a location.
Landowner/Developer/Agent	 We concur that the eventual growth strategy should be a combination of the four growth strategies. Urban intensification should not however be limited to the main Nottingham Urban Area. Whilst Erewash Borough contains settlements that form part of the Nottingham Primary Urban Area, no part of Erewash directly borders with Nottingham City. Erewash does however contain land immediately adjoining Derby City, and is actually located within Derbyshire, therefore falling under the remit of Derbyshire County Council. Erewash has a clear relationship with Derby City however the relationship between Nottingham and Derby is not discussed at all within the consultation document, and thus such relationships are at risk of being downplayed.

Landowner/Developer/Agent	 Supports the approach set out in OS2 insofar as it increases the scope for sustainably located opportunity sites to come forward for development to meet future growth needs across Greater Nottingham. The University considers the 'negative impacts' of a more disbursed growth strategy are lessened following the seismic change in the nature of travel patterns and commuting we are experiencing, as well as changes to the retail focus of the City and town centres. This change together with changing market demand rather supports approach set out in OS2. In order to achieve the vision and objectives for growth in Greater Nottingham, there will undoubtedly need to be some development in the Green Belt.
Landowner/Developer/Agent	• It is considered that there are a number of benefits associated with a dispersed growth strategy. This would ensure that the benefits of growth are spread around the area with a greater number of sub-markets and locations having their growth needs met. It is noted that one of the identified positive impacts of a dispersed strategy is the potential for higher affordable housing contributions due to higher values. This is not automatically the case as there is the potential for higher infrastructure costs. Viability will obviously need to be assessed in the round taking account of likely costs. Increased congestion could be mitigated somewhat by development in locations where public transport could be provided. The delivery of new settlements is often complicated and time consuming; relying on delivery from them to meet housing need carries with it a degree of risk. There is the potential, however, that new settlements could form part of the future housing supply alongside options which can deliver during the earlier years of the plan.
Landowner/Developer/Agent	• Support this growth option and consider that it could be suitable in conjunction with the urban intensification growth option (see separate response to Question OS1). Further consider that sites adjacent to the most sustainable settlements in each local authority area should be prioritised for development as they are considered to be within the most sustainable locations.
	 Green Belt loss is considered to be a 'negative impact' from this option but each authority could look to impose compensatory improvements to offset any Green Belt that

is released adjacent to the Main Built Up Area (NPPF [National Planning Policy Framework] paragraph 138).
• Without treasury intervention the delivery of new settlements poses a significant challenge. They will also require careful coordination between local and national government agencies with upfront funding streams made available to address infrastructural requirements. The councils must also coordinate an open developer forum with invitation made to all to help coordinate their delivery in a fair and open way. Sites comprising complex land ownerships should also be avoided as such land configurations will at worse cause major projects to fail or incur significant delays.
• In the short to medium term, the most realistic and sustainable means of facilitating development involves the sustainable expansion of existing settlements and this will inevitably involve a Green Belt review.
• Green Belt bounding existing settlements and conurbations must be objectively considered and where land is promoted for development within Green belt and it is demonstrated that land does not fulfil the intended functions of Green Belt the identified land should be considered for release from the Green Belt.
• Greenbelt land is typically intensively farmed offering limited biodiversity or ecological value. Development of such sites can therefore pose less environmental harm than the redevelopment of long term fallow brownfield sites where nature has reclaimed land or recreational public open space. In light of the current COVID 19 Pandemic; the role urban design plays in delivering healthier work life environs must be given careful consideration.
 The traditional format of cities is changing and therefore spatial strategies must also change. Greater emphasis should be placed on preserved existing open space and recreational areas within urbanised areas. A dispersed spatial strategy is best placed to accommodate the surplus housing

Q	uestion OS3: Green and Blue Infrastructure-Led Growth Strategy Option
Resident	 Green/Blue corridors should be part of any development, contiguous with cycling/walking corridors.
Resident	• Notes that there are generally positive impacts, but Fig 2.3 item 2 is a strong negative.
Resident	• In considering the options for growth in the Strategic Plan area, the potential for further development within the northern part of Broxtowe Borough is most likely to impact on Amber Valley, given the common boundary between the two local authority areas. Any significant growth in this location could have economic benefits to Amber Valley residents.
Resident	 National Watersport Centre to Radcliffe should be protected, more trees and scrublands should be developed.
Resident	 Opportunities at Gamston to Cotgrave canal, in Broxtowe canals, woodland and lakes east of Ilkeston. Developments should include streets lined with trees.
Resident	 Safeguarding green and blue infrastructure (e.g. green corridor between Beeston Rylands and the Boots/Severn Trent housing development on edge of Nottingham city) provides major recreation and health benefits as well as maintaining wildlife biodiversity.
Residents/Specialist Group	• Agree but regards that the Plan should also include the GI [Green Infrastructure] benefits of the Green Belt, both current and the potential for enhancement.

Residents/Specialist Group	• Any growth option should ensure that major development sites deliver good green and blue infrastructure as part of a network. Good, safe, attractive and coherent routes for walkers and cyclists should be an integral part of the existing and proposed blue/green infrastructure and enable developments to connect the centre of Nottingham with its surrounding countryside as well as to and from green spaces within the urban area.
Duty to Cooperate Parish	 Regard that the strategy should be firmly based on the criteria presented by Natural England.
	• Green and Blue infrastructure should certainly be enhanced as environmental assets, to improve Biodiversity Net Gain and to create Nature Recovery Networks. It is not clear how development would provide this as likely to have a large negative impact on wildlife, both flora & fauna. Removal of derelict or disused industrial buildings (where not Heritage Assets), particularly adjacent to canal networks, could enhance the natural environment but beyond this it is not clear what is being proposed in the strategy? An impact assessment should be undertaken for each of these areas where development is proposed.
	• Building development in a flood risk area (particularly flood plains) is not a good idea. It is difficult to see how managing flood waters can be improved by development in areas where flooding is a high risk.
Other Consultee	• Contend that the preferred approach should be urban intensification. The negative impacts of a focus on a 'Green and Blue Infrastructure – Led Approach' are similar to those identified in Figure 2.2 relating to the 'More Dispersed Growth Strategy' particularly loss of Green Belt land which benefits all as a leisure resource and increased pollution from commuting.
	• Over development of these area risks destroying the very value of the corridors themselves.
Other Consultee	The Green & Blue Infrastructure-Led Growth Strategy Option priorities delivering new
	 green and blue infrastructure in association with major new development, which focuses development along strategic river corridors with higher associated flood risks and increases potential harm to existing protected wildlife sites from greater visitor numbers. The enhancement and protection of Green & Blue Infrastructure and the wider ecological network should be addressed via individual strategic allocations and policies rather than as a Growth Strategy Option.
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Other Consultee	• Enhancing GBI [Green and Blue Infrastructure] assets must be clarified to mean both nature and green assets - its biodiversity and value in terms of those on foot, cycle and horse – to ensure everyone is able to access quiet green space with good air quality from home.
	 Preservation of 'green lungs' and re-greening of the urban landscape to improve biodiversity as well as provide access. Too often 'enhancing' means simple uniform cropped sports pitches of very low value to wildlife and little to engage other users. The overall value of Green and Blue assets depends on their structural natural complexity. Active Travel routes should pass through green corridors wherever possible and existing
	routes should be re-greened.
Statutory Consultee	 Considers that strategic river and canal corridors such as the River Trent and the Nottingham & Beeston and Grantham Canals should continue to be prioritised for appropriate development that can enhance them and assist in allowing them to realise their potential as multi-functional resources which can offer wide-ranging benefits to local communities.
Statutory Consultee	 Would be supportive of an approach which would enhance Green and Blue Infrastructure corridors. Would also encourage the incorporation of Green Infrastructure within all development proposals. Suggest that as well as GBI [Green and Blue Infrastructure], the Strategy could identify possible sites which would contribute to the Nature Recovery Network (NRN). Potential

	sites for biodiversity off-setting could also be identified.
Statutory Consultee	 Whilst Severn Trent are supportive of Green Blue Infrastructure and would encourage that development looks to incorporate BGI [Blue and Green Infrastructure] and takes advantage of / enhances any existing GBI [Green and Blue Infrastructure]. This approach will need to be undertaken carefully ensuring that the delivery of essential infrastructure can also be provided without additional harm to other GBI [Green and Blue Infrastructure] areas.
Statutory Consultee	 Supportive of this approach. A focus on enhancing blue and green infrastructure is likely to achieve multi-functional benefits, ranging from improved habitats and biodiversity through to reductions in the level of flood risk as a result of reconnecting areas of land to the natural floodplain.
Statutory Consultee	 A strategy based on Green and Blue infrastructure would need to ensure heritage assets and setting are conserved or enhanced. Opportunities for heritage led regeneration could be identified within the Plan, and for heritage led place making as a result of the Greater Nottingham area's rich industrial legacy and historic landscape character.
Local/Specialist Group	 Are of the view that a generalised approach is potentially harmful when considering biodiversity and an assessment should be made on a site by site basis. Notes that this section seems to be strongly informed/ influenced by the 6Cs [Derby, Derbyshire, Leicester, Leicestershire, Nottingham and Nottinghamshire] study. Although out of date and linked to defunct regional planning, it is a very useful reference point. However, are concerned that paragraph 3.16 implies that the purpose of the 6Cs [Derby, Derbyshire, Leicester, Leicestershire, Nottingham and Nottinghamshire] Green Infrastructure Strategy was to identify locations where GI [Green Infrastructure] should be delivered 'in conjunction with major regeneration and residential development'.

Landowner/Developer/Agent	 Do not consider this to be a spatial option. It is important to plan effectively for the provision of green and blue infrastructure in the context of major development. This is a key consideration in determining what form development should take and how a particular development proposal might conserve and enhance the GBI [Green and Blue Infrastructure] network, and do so creatively in the context of master planning and design.
Landowner/Developer/Agent	• Supports measures to enhance green and blue corridors. Further holds that the blue corridors, forests and community parks should be retained as recreational, leisure and wild-life corridors, and enhanced. With regard to urban fringe areas there is an opportunity to put forward comprehensive development plans which address future growth but at the same time provide accessible green space within and adjoining the new development.
Landowner/Developer/Agent	• Each of the four growth options put forward can and should contribute to the achievement of sustainable development. The growth strategy for Greater Nottingham should consider both the locational attributes of particular locations together with the specific benefits. The Report from Aecom must be considered and used within this context.
	• The strategy should focus on the delivery of a range of sites and locations in order to meet the Greater Nottingham area's housing needs.
	• To meet the needs of Greater Nottingham, new development sites outside the existing urban area will be required, including Green Belt sites.
Landowner/Developer/Agent	 Development that enhances the green and blue infrastructure should be supported in that it can contribute to delivering a more connected, biodiverse, accessible and attractive network of spaces and places to enjoy.
Landowner/Developer/Agent	 This strategy could also be utilised on new development particularly where development is brought forward adjacent to existing assets. It is however not considered to be in its

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Landowner/Developer/Agent	 own right a suitably sustainable or spatially preferable option. The ability for sites to provide new publicly accessible open space should however be afforded significant weight, particularly where it occurs on land which does not benefit from public access. Considers that the Greater Nottingham Authorities should adopt a mixed strategy that promotes accessible development which can also help retain and enhance green space for the benefit of communities.
	 Should include a focus on growth where there are existing or planned transport improvements. The strategy should consider suitable sites which have existing infrastructure as well as those which can be made more sustainable by correlating development with new infrastructure, for example the HS2 Hub Station at Toton, as part of a robust and strategic approach to planning for the Greater Nottingham area.
Landowner/Developer/Agent	 Despite its importance, this should not be a criterion that guides the location of major development as to concentrate development simply where there are GBI assets could have negative impacts. The emphasis must be on planning effectively to ensure the design of new development reflects GBI [Green and Blue Infrastructure] potential.
Landowner/Developer/Agent	 Considers that a more dispersed Growth Strategy Option is preferable for the Greater Nottingham Strategic Plan Area.
	Question OS4: Transport-Led Growth Strategy Option
Resident	 Development should not proceed without sustainable transport strategies. Development must be supported by sustainable transport strategies to support the net-zero deadline. In certain cases, where development is likely to increase motorised traffic volumes, CIL agreements and improvements to transport must be in place before a certain amount of development can proceed. Particular attention to transport led development should be given to the HS2 site at Toton, Chetwynd, Stanton, Ratcliffe on Soar and the Airport, reducing the need for local authorities to bid for infrastructure improvements as they can largely be delivered through Midlands Connect/HS2 proposals.

Resident	 Lists potential corridors. All current tram lines should terminate at the train station. Support tram to Gedling and extension of tram to Top Wighay Farm. HS2 should link to Ilkeston, Giltbrook, EMA [East Midlands Airport] and Derby
Resident	• The strategy should include an integrated public transport system which responds to development rather than being a reason for developing in any one place.
Resident	Supports further extension of the NET [Nottingham Express Transit] tram to serve wider area.
Resident	The NET [Nottingham Express Transit] tram expansion plans are not enough.
Resident	• All development should be built around transport infrastructure. Anything else is completely unsustainable and is highly likely to impact on climate change.
Resident	 Yes, strong support, but question why the negative impacts focus on the A52 corridor and the green belt between Nottingham and Derby.
Resident	Seeks better road surfaces for cycles.
Resident	Positive impacts: potential for improvements to cycleway network.
	 Negative impacts: less than "negative impacts" of public-transport improvements
Residents/Specialist Group	The right kind of transport infrastructure (and services) are needed. Seeks the provision of walking and cycling ways along corridors to and from hubs as well as connecting to adjacent areas.
Residents/Specialist Group	Regard that a generalised approach is potentially harmful when considering biodiversity

	 and there should be site by site assessments. To advocate any development model that has poor communication links would not make sense or be sustainable, so in effect considerations relating to transport must strongly apply to all of the options.
Residents/Specialist Group	• Regards that it is important to link development to active travel infrastructure. Any aspect of a transport led strategy that might be incorporated should focus on sustainable transport links. The design and implementation of Active Travel routes should follow the guidance in the new DfT [Department for Transport] Local Transport 1/20 Report on 'Cycle Infrastructure Design' and particularly its Core design principle, i.e. that "Networks should be Coherent, Direct, Safe, Comfortable and Attractive" (paragraph 1.5 on page 7).
Other Consultee	 Development and transport infrastructure needs to be assessed for its effect on the connectivity of green infrastructure and Active Travel routes, including the right of way network.
	Transport-led strategy should focus on sustainable transport links.
	 The design and implementation of Active Travel routes should follow the guidance in the new DfT [Department for Transport] Local Transport Report on 'Cycle Infrastructure Design' and particularly its Core design principle.
Other Consultee	The benefit from reduced pollution through the greater use of public transport needs to be carefully evaluated against its impact on the broader environment. Focusing the growth by Urban Intensification (OS1) has the potential to remove the need for additional infrastructure and increase the intensification of existing transport networks.
	• If a development site's suitability is based upon its proximity to a transport node, it must be ensured that that transport node is constructed and operational before the scheme is fully inhabited.

Other Consultee	 Requires significant levels of investment in the NET [Nottingham Express Transit] and prioritising developer contributions to transport over and above other infrastructure. There are disadvantages to pursuing any proposed Growth Strategy Option in isolation. The preferred growth strategy of the GNSP [Greater Nottingham Strategic Plan] is most likely to be a combination of two or more options. Sustainable transport is a consideration in the combination of urban intensification and more dispersed growth.
Duty to Cooperate Council	 Will continue to engage in this process so that a robust transport evidence base can be prepared to support the production of an IDP [Infrastructure Delivery Plan]. This work will need to use the latest East Midlands Gateway Transport Model so that the necessary strategic transport infrastructure (up to 2038) can be determined. On figure 2.5 the possible tram extension to the north of Hucknall (Top Wighay Farm) is not shown.
Duty to Cooperate Council	 In considering the options for growth in the Strategic Plan area, the potential for further development within the northern part of Broxtowe Borough is most likely to impact on Amber Valley, given the common boundary between the two local authority areas. Any significant growth in this location could have economic benefits to Amber Valley residents.
Duty to Cooperate Council	 The NPPF [National Planning Policy Framework] relates to promoting sustainable travel identify opportunities from existing or proposed transport infrastructure as outlined in the Transport – Led Growth Strategy Option. Firmer inclusion is required to this section to promote active travel to promote walking, cycling i.e. the construction of new, high-quality cycle tracks, review existing routes and good networks that feed into those routes is integral to the design of schemes, and contribute to making high quality places. Recommends The King's Fund Active and safe travel report also explores how active and safe travel affect health.

 Note the NET [Nottingham Express Transit] already extends to Toton. Presumably it should refer to extending the tram to the EM [East Midlands] Hub Station & Long Eaton? Development surrounding the area of the East Midlands Hub Station is supported in the Chetwynd: Toton & Chilwell Neighbourhood Plan. As is improving public transport and active & sustainable travel.
 Where new transport infrastructure is proposed to open up land for development there may be opportunities to facilitate the delivery of the associated services needed for development to occur.
 Supports active and sustainable transport methods such as cycleways and footpaths. Road building has the potential to break habitat connectivity in the landscape with adverse impacts on the ambition to develop a Nature Recovery Network.
 A transport led growth strategy would need to ensure heritage assets and setting are conserved or enhanced.
 Notes that a 'broad area of search' for growth has been conducted to identify additional possible site allocations, and further understand that these will be investigated to consider their suitability of allocation, with further consultation to follow. Also understand that at this stage figures are provisional and are likely to change to meet the needs of each council.
 Support the proposal for growth to be transport-led, with sites selected based on the ability to deliver sustainable development and be serviced by sustainable transport.
 The Chetwynd Barracks site provides an opportunity for transport network improvements and its proximity to the planned HS2 station and associated strategic growth site at Toton, means that it is also capable of contributing to the Transport-Led Growth Option referred to in Question OS4.

Landowner/Developer/Agent	• The Transport Led growth should also take into consideration pedestrian and cycle links, and again the site is well connected with several well used routes nearby.
Landowner/Developer/Agent	An extension of the tram from Phoenix Park towards Kimberley differentiates Low Wood Road (ref. B05.1) from other locations considered in the Aecom Study and would help meet ambitions for a modal shift towards more sustainable forms of transport.
	• The overall strategy for Greater Nottingham should incorporate urban concentration particularly where there are transport opportunities that utilise existing infrastructure and services, as well as correlating new development with new infrastructure which would deliver sustainable growth.
Landowner/Developer/Agent	 It is important to recognise the potential to enhance public transport connectivity and this is not always related to existing or programmed major transport infrastructure. The proximity of settlements to the Nottingham urban area is a major factor in travel times, and the potential for cycling is greatly increased in such locations. Further, existing bus routes with some redirection and increased frequency can be very effective in achieving modal shift and sustainable forms of travel without expensive infrastructure. Therefore, the potential of existing settlements and sites in terms of their proximity to the urban area and potential bus and cycle links is important in using transport as criteria for the distribution of development.
Landowner/Developer/Agent	 Notes that having high levels of good quality transport infrastructure means that transport is more efficient and generates less CO2 [carbon dioxide] than might otherwise be the case.
Landowner/Developer/Agent	 Given the issues relating to highway capacity and lack of road crossings of the River Trent, it is vital new development is located adjacent to sustainable areas where there are services, facilities and employment within close reach, or where development can take advantage of new and planned transport infrastructure to access larger centres and the main urban areas. The Councils should look favourably on schemes with good access to existing infrastructure, particularly the Nottingham Express Transit (NET) network and heavy rail networks.

	Question OS5: Climate Change		
Resident	 Suggested cheap solutions to address climate change, covering agriculture, solar power, wildflower meadows, limit car use, cycling, speed limits, cargo bikes. 		
Resident	 Regards that more development should mean a greener city. Suggests planting a tree for each new house, developing around lakes, rooftop gardens, insect friendly zones, more parks/allotments, electric vehicles/buses, cycle paths, better tram system, more P&R [Park and Ride]. 		
Resident	Can increase 'carbon neutrality' by concentrating development around existing infrastructure.		
Resident	Regards that there needs to be a way to enforce the toughest environmental standards on housing.		
Residents/Specialist Group	• The natural environment provides 'ecosystem services', many of which help mitigate climate change, so protecting all our existing natural capital and looking to increase it is fundamental to any sensible Climate Change policies.		
Residents/Specialist Group	Focussing on active travel and sustainable public transport and make open spaces pleasant and accessible.		
Residents/Specialist Group	 By among other measures - maximising the ability of our landscapes to capture carbon through natural processes, adopting a truly 'brownfield first' policy and following a clear hierarchy for all future transport investment. 		

Duty to Cooperate Parish	 Advocates greater provision of green infrastructure, in particular by increasing the extent of urban forests.
	 Sustainable Transport, High Efficiency Buildings, Modern Methods of Construction, Green Energy Initiatives – solar and air/ground source heat pumps, district heating systems etc., Rain and Greywater Recycling, Improving and Enhancing Green/Blue Infrastructure.
Duty to Cooperate Council	 Recognises the importance of a joint approach to securing appropriate evidence to underpin effective planning policies to tackle climate change. A similar approach is advocated in developing the Greater Nottingham Strategic Plan, as well as recognising the opportunity for the various local authorities to work together on a sub-regional basis to tackle climate change through the planning process.
Duty to Cooperate Council	 Air quality is a key environmental factor that has an impact on health. It is recommended the use of the recently finalised East Midlands Air Quality and Emissions Mitigation Guidance for the East Midlands. Incorporate statement about renewable energy and ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping.
Statutory Consultee	 To meet the Government's target of being carbon neutral by 2050 we must recycle, reuse and responsibly adapt our existing historic buildings. Historic England's Heritage Counts document No Place Like Old Homes sets out how reusing our built historic environment can help reduce carbon. The Plan could consider setting this out as a basis for Part 2 plans or including as part of a strategic climate change policy.
Statutory Consultee	 The easiest way to address climate change is to locate the majority of new development in areas at no (or low) risk of flooding.
	 The Strategic Plan could increase the % requirement for biodiversity net gain over the 10% requirement in the Environment Bill.

Statutory Consultee	• Would recommend that any carbon neutral proposals consider implementing Water efficient design to reduce consumption of water and minimise the need to process water for use manage water within the development and treat wastewater before discharge.
Statutory Consultee	 Natural England, the Environment Agency and the Forestry Commission have produced a shared vision to tackle the climate and ecological emergency. This includes large- scale woodland planting, protecting peatlands, supporting farmers, managing flood risk, taking a strategic approach to land use and encouraging less carbon intensive materials.
Other Consultee	• Focus on active travel and sustainable public transport and making its open spaces pleasant and accessible for people and wildlife.
Other Consultee	 Suggests that the Councils should adopt a 3-stage process - articulate a vision, engage local communities, set targets and milestones.
Other Consultee	 Acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Councils from stipulating energy performance standards that exceed the Building Regulations but consider that the Councils should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations. Regards that the key to success is standardisation and avoidance of every Council setting out its own approach to energy efficiency, which undermines economies of scale for manufacturers, suppliers and developers.
Landowner/Developer/Agent	 Ahead of the ban on sales of high emission vehicles in 2035, locating development adjacent to sustainable urban areas negates the need for daily travel to access higher order services. The land to the west of Hucknall is a sustainable location for new development. It is in close proximity to various services and facilities which would reasonably meet the day to day needs of residents and could provide the opportunity to deliver new services and facilities which would benefit both new and existing residents.

Landowner/Developer/Agent	 Development should be located where it can take advantage of high-quality public transport or where the need to travel is reduced by delivery of development in close proximity to services, facilities and employment opportunities. On this basis, sites such as northeast of Toton/Chilwell Lane, Bramcote, are considered to be optimally located to reduce the need to travel.
Landowner/Developer/Agent	 Where new targets are to be set e.g. achieving carbon neutral, then these should be phased and appropriate account should be taken of the potential financial implications. The changes proposed and the financial implications should be fed into infrastructure delivery plans and viability appraisals used to support the plan.
Landowner/Developer/Agent	 Where strategies and policies are proposed, would welcome a fully evidenced approach to the introduction of new policy requirements and that these emerging/ new policies reflect the prevailing Building Regulations.
Landowner/Developer/Agent	Regards that policies should encourage renewable energy projects.
Landowner/Developer/Agent	 The challenge of climate change must be met by reducing Cos [carbon monoxide and carbon dioxide] emissions by reducing the reliance on cars as a primary means of travel, through site design, by identifying site planning measures that provide for passive solar design to allow natural heating and cooling, and through setting new standards and encouraging accelerated take-up of low and zero carbon techniques and technologies.
Landowner/Developer/Agent	 Paragraph 2.19 of the consultation document refers to a 'resolution' for Broxtowe to be carbon neutral by 2027. In response, consultee requests that further information is provided in the Strategic Plan to set out how carbon neutrality will be achieved, so that it can be understood how development on sites such as Chetwynd Barracks may contribute to this objective.

Landowner/Developer/Agent	 The adopted strategy can and should accord with the Greater Nottingham (GN) Authorities ambition to make a step change towards being carbon neutral during the plan period by prioritising the development of sites which are, or can be made, sustainable through on site provisions and off-site accessibility. These factors should have significant weight in the consideration of the overall strategy by the GN Authorities.
Landowner/Developer/Agent	 Agree that climate change is a key issue that will need to be addressed irrespective of the growth strategy options or options which are selected. It is primarily an issue that affects the form that development takes and will be addressed through appropriate planning policies and changes to the Building Regulations.
Landowner/Developer/Agent	 The development strategy, in continuing to recognise the housing and economic needs of both the Nottingham urban area and those identified key settlements, needs to comprise environmentally responsible development which addresses climate change in order to minimise its impacts, through locating development which has access to sustainable transport, low risks of flooding, use of appropriate means of construction and promoting the use of low carbon technologies.
Landowner/Developer/Agent	 Notes that Councils ought not to pursue climate change policies affecting housing which exceed those currently subject to consultation through the governments 'Future Homes Standard'. A policy which seeks to drive standards above those currently subject to consultation will likely impact the viability of schemes, thus the plans deliverability.
	Question OS6: Amount of New Housing
Resident	 Growth should be encouraged but stagnation should be avoided. A 'graduate city' should be promoted. Nottingham should encourage industries to locate here.

	 Nottingham should focus on graduates, students, immigrants and those on the council lists as well as commuters. Rushcliffe and Gedling should concentrate on Middle class and professional families in larger homes and Broxtowe (like Nottingham City) should seek a more urban population made up of graduates and commuters.
Resident	 New employment opportunities suggest a higher housing need than the standard methodology would suggest but as these are high skilled jobs the number of affordable homes will be reduced. Smaller homes should be the focus for new developments.
Resident	 No further Green Belt needs to be lost in South Broxtowe. Broxtowe can meet its housing needs in the foreseeable future from its existing identified sites.
Resident	Less homes than suggested by the methodology. Considers that redundant office space should be utilised.
Resident	• Approved permissions should be built-out before building any further houses.
Resident	Build quality versus quantity. Lack of thought on creating a community.
Residents/Specialist Group	 In general, do not welcome any additional housing allocations in the plan area because there are already significant unused allocations in all of the Locals Plans.
	 Identifying more sites risks increasingly unsustainable sites being chosen in terms of communications, services and their impacts on wildlife habitats and landscape because, in many cases, the least damaging locations have already been selected.
Residents/Specialist Group	The standard housing 'need' assessment is based on the 2018 household projections. It is doubtful that these are still relevant after Coronavirus and Brexit.

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Duty to Cooperate Parish	• The proposed East Midlands Hub Station and associated employment opportunities would suggest that more homes are required in the Area surrounding them than would be proposed by the standard methodology. The development here will be significant enough to require a different algorithm to calculate local housing. We should aim to minimise commuting using the slogan 'live local, work local, shop local'.
	 Improving access to greenspace. A new review for 2020 (Public Health England March 2020) as well as evidence from this pandemic (particularly in the London Royal Parks & possible loss of skylarks) have highlighted the need for more public space, especially green space than has been planned for in the past. Taking a lesson from the effect of the huge increase in footfall on our Local Nature Reserves points to the needs of people (exercise, dog walkers, cyclists etc.) as well as ensuring sufficient space for wildlife to flourish.
Duty to Cooperate Council	• The national planning guidance on housing need assessment refers to examples of circumstances where it might be appropriate for local planning authorities to plan for a higher level of housing need than the standard methodology indicates, based on past trends. The proposed HS2 Hub Station at Toton can be expected to boost the need for both housing and economic development within the Strategic Plan area and could be a justification to plan for a higher level of housing growth than the standard methodology indicates, although given the extensive area of land within the Plan area, outside the existing main urban areas and villages, that is within the Green Belt, it may be difficult to achieve such higher growth.
Duty to Cooperate Council	 Developer funding for the provision of local bus services and bus stop facilities will be required to support a vibrant and sustainable community including access to key services including education, work, health and shopping including access to leisure facilities.

Duty to Cooperate Council	There is potential for multi-use of space If shared community use and co-location of services is a Development Consideration. Consider One Public Estate.
	 Planning for the Future with Age-Friendly Design challenges the current failure in England to meet the need for housing that is suitable for the older generation. From making the current housing stock more accessible through to delivering specialised housing for people with significant care needs, there is currently a failure to build enough of all forms of age-friendly housing.
Other Consultee	• The standard methodology provides the basis for a starting assumption. Any increase in that number should be properly justified and the apparent pre-judgement that this is a "minimum" figure as stated in 4.11 needs to be established by objective evidence. The plan should propose a viable weighting of factors such as impact on the wider environment and impact on key criteria including impact on the Green Belt and climate change and weight this against any benefits of the proposed housing numbers at a strategic level and at an individual site basis.
Other Consultee	 Note that LHN [Local Housing Need] assessment is only the minimum starting point. Consider going above if: The NPPG [National Planning Practice Guidance] indicates that if previous housing delivery has exceeded the minimum LHN, this level of delivery may be indicative of greater housing need if future jobs growth will generate a need for an increased labour supply to meet increasing employment demand, this will in turn lead to a need for new homes to accommodate the new population. Households whose needs are not met by the market informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated. The SOCG [Statement of Common Ground] should be publicly available at publication stage.
	In Greater Nottingham, there are no over-riding environmental constraints to justify a

housing requirement figure lower than the minimum LHN [Local Housing Need].
 The amount of housing which the Plan should deliver should, as a starting point, have due regard for the standard methodology for calculating housing need. Further notes that there is no robust justification to reduce housing need below the level established by the updated Standard Methodology.
 Notes that the social implications of not releasing land where appropriate outweighs any harm associated with Green Belt release.
 Planning for an insufficient quantum of new homes will reduce the number of market and affordable homes delivered, creating further affordability issues. This may have negative economic and social impacts. This would also increase the level of traffic on roads, as people commute from wider areas where housing is more available and affordable, adding to existing highway capacity issues. It is noted that a key recurring theme of the Planning for the Future White Paper is enabling residents to buy where they want to live and work. To ensure flexibility and delivery, the Council's should seek to allocate land to deliver 15% above the established Housing Requirement.
• Given this Plan is predominantly looking to the period beyond the current Core Strategy, there should be sufficient time to ensure allocated sites can begin delivery prior to 2028.
 Economic growth aspirations for Nottinghamshire must be supported with new housing provided for workers. An upward adjustment in the housing number may therefore be required. The sustainability of new homes far exceeds that found in old housing stock. The delivery of new housing choices will therefore aid in meeting the governments and this plans objective to address climate change through increased energy performance. An important concern may arise from the proposed revocation of the Duty to Cooperate. Should this arise then Nottingham City's capacity to redirect it housing requirement to neighbouring authorities may also disappear. The GNP [Greater Nottingham Partnership] will need to grapple with how best to address this issue.

Landowner/Developer/Agent	 A flexible contingency of 20% (as per the Local Plan Advisory Group's recommendation) should be applied to the overall housing land supply to ensure that the Local Housing need is recognised and treated as a minimum rather than a maximum figure. Moreover, whilst the potential role and benefits of significant strategic allocations in realising strategic growth is recognised, such developments are by their very nature be extremely complicated proposals to deliver and the GNSP [Greater Nottingham Strategic Plan] must, therefore, take a realistic view of the timescales for their delivery (taking account of key issues such as land ownership) and allocate additional land to address needs in the interim if needs be.
Landowner/Developer/Agent	• The Planning White Paper, which indicates that in the future housing requirements will be set by government. For the Greater Nottingham Area (GNA) the initial indications are that the rate of housebuilding will need to increase substantially over and above currently adopted housing requirements. If these changes become part of national policy, then it will have significant implications for the Plan in terms of the spatial distribution of development and land use planning in the GNA. Specifically, it will mean the release of a significant amount of Green Belt land on sites adjoining the edge of the main urban area, around key settlements and other villages, and at other locations along transport corridors/at transport hubs. This in turn will impact on transport infrastructure priorities and investment (roads and public transport) as well as the location of new employment sites.
Landowner/Developer/Agent	 The recent 'Planning for the Future' White Paper and the 'Changes to the planning current system' consultation clearly set out the Government's drive to deliver more housing in England than is being planned for in adopted Local Plans and also more than would be delivered with the current Standard Methodology for calculating housing need. The GN [Greater Nottingham] Authorities have struggled historically to deliver their housing requirements and have only met their cumulative housing needs in two years since 2011, resulting in a 2,883 homes shortfall developing over the past eight years. The GN [Greater Nottingham] Authorities have collectively and consistently overestimated delivery on sites, and failed to recognise that some sites would, for whatever reason, stall. The growth strategy therefore must make sure there is flexibility

	to ensure delivery – this means more sites, including smaller sites, and planning early and comprehensively for strategic sites. The strategy should therefore include a wide range of sites, both to ensure delivery rates and support smaller villages.
Landowner/Developer/Agent	 There is not considered to be any justification for planning for fewer houses than produced by the updated standardised housing methodology which is expected to be published later this year. It is considered that additional homes, over and above that required to meet local housing need, should be provided for. This would ensure that there is sufficient flexibility.
Landowner/Developer/Agent	 The amount of housing established should, as a starting point, have due regard for the standard methodology for calculating housing need. It is considered that there is no robust justification to reduce housing need below the level established by the updated Standard Methodology. To ensure flexibility and delivery, the Council's should seek to allocate land in the region of 15% above the established Housing Requirement.
Landowner/Developer/Agent	 We consider that the Plan should anticipate a short term introduction of the new Standard Method. Based on the new method it will be necessary to plan for 66,380 additional homes over this period which is 16,124 more than proposed by the ACSs [Aligned Core Strategies].
	• Concerned that the footnotes to Appendix 1 clearly identify that actual supply is less than the figure of 61,953 because this figure includes possible additional capacity at existing allocations and SHLAA [Strategic Housing Land Availability Assessment] sites with no planning status. These are potential rather than confirmed sources of supply that should not, at this point in time, be included in the current total housing supply identified for the Plan area.
	 Consider the Plan evidence base must set out a baseline housing supply for the Plan area drawn from the Annual Monitoring Reports of the constituent authorities. The lack of this information is a major omission that should be addressed before the next consultation stage of the GNSP [Greater Nottingham Strategic Plan].

	 Note that more transparency is needed over housing completions. There is substantial and significant shortfall in Broxtowe (see 2017/18 SHLAA [Strategic Housing Land Availability Assessment]). The significant delays and under-provision that characterise the ACSs [Aligned Core Strategies] must be an issue at the forefront of site selection in this GNSP [Greater Nottingham Strategic Plan]. Concerned that the Growth Options study neglects this fundamental consideration.
	 Concerned that the Growth Options study focusses on defining strategic growth areas capable of accommodating 1,000 homes and consider this threshold to be too high. Smaller growth areas and sites must be considered.
Landowner/Developer/Agent	 The standard methodology ought to represent the starting point for the calculation of housing need in the Greater Nottingham area.
	 Support the recognition at Paragraph 2.25 of the consultation document that there may be demonstrable reasons to establish a housing target greater than the outcome of the standard methodology. Also note, in this context, that Government is currently consulting on changes to the standard methodology. If changes to the methodology are implemented, then they would expect the Greater Nottingham authorities to have regard to this when preparing the Plan.
Landowner/Developer/Agent	 A specific additional factor to justify planning for more new homes than the standard methodology suggests might be the aspiration for economic growth, which could otherwise be constrained by a lack of housing supply. A key example could be the area surrounding the regional HS2 rail hub at Toton whereby economic growth aspirations would need to be commensurate with an uplift in housing numbers to accommodate and support that economic growth delivery.
Landowner/Developer/Agent	 There may be potential through Neighbourhood Plans for instance, to increase the amount of provision in smaller communities to meet specific needs such as affordable

	housing, such as on exception sites, where particular local needs are identified through local housing needs studies.
Landowner/Developer/Agent	 Regards that the Coronavirus crisis represents the exceptional circumstances required to depart from the standard methodology of predicting levels of future housing required, as advocated in para 60 of the NPPF [National Planning Policy Framework], in order to address the reduction in housing supply and, with housebuilding recognised as a key economic driver, to help stimulate the economy.
Landowner/Developer/Agent	Currently Figure A1.1 sets out that the authorities have an estimated supply of 61,963 (from 2018). This figure comprises 8,689 dwellings that have been taken from EBC's [Erewash Borough Council's] SHLAA [Strategic Housing Land Availability Assessment] with no justification that all of the sites listed in the SHLAA [Strategic Housing Land Availability Assessment] are deliverable. EBC [Erewash Borough Council] have consistently failed to deliver the housing they need (62% in the 2019 Housing Delivery Test) and can currently only demonstrate a 3.43 year supply of housing (2019 Five Year Housing Land Supply Statement). We therefore consider it unlikely that they have 8,689 deliverable sites. Additionally, 1,000 homes have been added to Rushcliffe Borough Council's housing delivery requirement but these are not expected to be delivered until after 2038. We therefore do not consider it appropriate to include the 1,000 homes and if removed from the total, notwithstanding the potential for EBC's total to reduce significantly, it leaves 60,963 dwellings. We do not consider that there is a sufficient enough buffer between the minimum need and estimated supply of new homes (1,543 dwellings) that should be provided across the HMA [Housing Market Area] between 2018 - 2038. In addition to the above, paragraph 2.22 of the Growth Options Study states that there has been a cumulative shortfall of delivery against the core strategy targets of 2,883 homes. This shortfall along with the unknown impact of the Coronavirus pandemic on delivery, are further reasons why the Greater Nottingham Authorities should plan to deliver more housing than the minimum requirement of 59,420 dwellings.
Landowner/Developer/Agent	 The emerging Strategic Plan should both recognise the failures of the past and be sufficiently bold to put in place a strategy to deliver the Government's policies. This

	includes planning for growth in an ambitious and positive way, including sufficient flexibility to ensure minimum growth requirements are met.
Landowner/Developer/Agent	• The Authorities have a shortfall of 2,883 homes against the Nottingham HMA [Housing Market Area] requirement. Stepped trajectories from 2018/19 in the Part 2 Local Plans sets the Authorities a significant challenge to meet their housing over the current plan period to 2028. The failure to meet collective housing needs is not just a problem for the Nottingham HMA [Housing Market Area], it is an issue across the country which is recognised by the Government. Accordingly, they have released a 'Planning for the Future' White Paper1 which propose a new Standard Methodology for calculating housing supply in England, with the aim being to significantly increase the annual supply of homes and introduce policies which help to ensure that Local Plans put in place strategies to ensure the right level of housing is delivered. Accordingly, the emerging Strategic Plan should both recognise the failures of the past and be sufficiently bold to put in place a strategy to deliver the Government's policies. This includes planning for growth in an ambitious and positive way, including sufficient flexibility to ensure minimum growth requirements are met. A range of sites will therefore be required to deliver the housing needs for Greater Nottingham and prevent a repeat of the current undersupply of homes in the Nottingham HMA [Housing Market Area].
Landowner/Developer/Agent	 Advise that the Local Plan Period be moved up to 2040 in the interests of clarity. Having regard for the New Standard Methodology, would like to highlight the importance of all local authorities within the Greater Nottingham region working together under Duty to Cooperate to provide sufficient homes for the region. This is especially relevant as a number of Greater Nottingham authorities have experienced significant increases in housing numbers following the new standard method, including Rushcliffe increased by 36% and Broxtowe increased by 35%, for example. It is the role of neighbouring authorities such as Erewash to work with the wider city region given the strategic links, control over the western edge of Nottingham and resultant Duty to Cooperate obligations in accordance with paragraph 26 of the NPPF [National Planning Policy

	Framework].	
	Question OS7: Growth Options	
Resident	 Existing infrastructure should be utilised to capitalize on the development. 	
Resident	 The land East of Ilkeston and West of Nottingham with the M1 running through should become a huge housing development because of its links to Nottingham, A610, A52, M1, HS2, Train lines. 	
Resident	Within cycling commuting distance of town centre	
Resident	Growth options preferred are OS1 and OS4.	
Resident	 Regards that the A453 corridor could have more business areas as well as a Shopping Centre/leisure. 	
	 Notes that landmarks such as Wollaton Park, Attenborough Nature Reserve and the National Watersports Centre should have more advertising to bring in more visitors as well as make all three major tourist attractions. 	
	 Creating more industries, creates jobs, makes people spend wages in retail and encourages growth that makes a city more influential. 	
Resident	 Prefers R10 because it is inside the green belt and urban area. 	
Residents/Specialist View	 Concerned about the sheer number of and unsuitability of many sites of the sites listed at Figure 2.8. The overall view is that additional allocations in the plan area are not welcomed until unused allocations are, not just consented, but actually developed. 	

	• In terms of the broad areas of search, regard that the boundaries are unclear at Figure
	2.8.
Statutory Consultee	• Densification of existing areas is the preferred approach as it has the potential to provide benefits to water consumption and wastewater management due to improved construction / design within modern development.
Other Consultee	• Regards that the Growth Options Study is not fit for purpose. The accuracy of data in the study is, in many cases, inaccurate misleading and / or incorrect. As such, it would be inappropriate to comment on broad areas until this work is amended.
	Have specific concerns regarding R15 A453 Corridor and the designation of this site as having High Potential for Strategic Growth is unfounded.
	• The Growth Options Study will need to be undertaken again and clearly state how conclusions were drawn, with particular reference to how inferred acceptable levels of growth have been derived. The study should not take a "policy off" approach to something as important as the Green Belt.
Other Consultee	 Have no preference for any broad areas of search identified in the Growth Options Study. The GNSP [Greater Nottingham Strategic Plan] should ensure the availability of a sufficient supply of deliverable and developable land. The HLS [Housing land Supply] should incorporate a contingency to provide additional flexibility. There is no numerical formula to determine an appropriate contingency quantum but if the GNSP [Greater Nottingham Strategic Plan] is highly dependent upon one or relatively few large strategic sites or settlements / locations then greater numerical flexibility will be necessary than in a case where HLS [Housing Land Supply] is more diversified. Suggests as large a contingency as possible (at least 20%)
Duty to Cooperate Parish	 B09 – Northeast of Toton - Mainly agricultural land with low environmental value and would enable a new link road from Chetwynd Barracks to the A52 and the proposed Toton link road. It would also provide greater opportunities to link areas for greater Biodiversity Gain, and establish Nature Recovery Networks. Also provides an opportunity

	for a new green corridor linking Toton/Chilwell with Bramcote/Stapleford.
Duty to Cooperate Parish	 The Parish of Greasley draft Neighbourhood Plan seeks to protect and enhance Green Infrastructure to provide a high quality and accessible network of well-connected and multi- functional spaces. Virtually all the open space within the Parish is currently designated as Green Belt. The development of B02 Eastwood Extension – B02.2 (West of Moorgreen) would have a significant impact on the setting Moorgreen and should not be deemed "suitable" as a potential area for strategic growth.
	 B04 Watnall Extension was turned down by the Inspector at the previous Local Plan Public Inquiry on the basis that the transport infrastructure was unsustainable for such a large urban extension proposal. The area should not be categorised as "potentially suitable for strategic growth"
	 Page115 shows two shaded areas described as having potential, one to the northwest on our border with Brinsley Parish and the other to the southeast between Moorgreen/Newthorpe/Giltbrook and Kimberley. The latter includes the setting of historic buildings and we hope that neither area comes under serious consideration.
Duty to Cooperate Council	• Sites that have the potential to be easily integrated with existing public transport should be weighted more favourably for future development. Sites in more rural areas, especially of a smaller scale of development, are likely to be more difficult to serve sustainably.
Duty to Cooperate Council	• Notes the growth options as set out in Figure 2.8. However, until specific sites are proposed with further information regarding dwelling numbers, there are no education comments to make.
Duty to Cooperate Council	 The potential locations which would be likely to have the greatest impact on Amber Valley residents are those within the northern part of Broxtowe Borough, with which Amber Valley shares a common boundary. However, within the 'Brinsley Extension' and the 'Eastwood Extension' there are only three potential sites that have been submitted to Broxtowe Borough Council for their consideration and none of these potential sites are located, or

	are of a scale, where they would have any material impact on Amber Valley.
Duty to Cooperate Council	 Notes that the AECOM [consultants] Growth Options Study is described as 'policy-off' and therefore does not in itself provide any justification for the release of Green Belt land throughout the study area. Nevertheless, are pleased to note that the study's conclusions in respect of how preferred sites identified by the Erewash Growth Options consultation document have been assessed are not contradictory. Notes that the Growth Options study has identified a number of non-Green Belt
	development opportunities. Wish to formally ask the GNPP [Greater Nottingham Planning Partnership] whether any of these potential development options are available to help avoid the need for EBC [Erewash Borough Council] to develop land within Erewash's Green Belt.
Landowner/Developer/Agent	 As identified by the Aecom Study, the Hill Top Farm site (ref. B09.1) already benefits from excellent bus and tram services, which would be further improved by the HS2 Hub Station. The site is well related to the urban area and the A52 to the east would prevent development coalescing with Chilwell. There are opportunities for new, publicly accessible open space and extensive new landscaping. The potential for integration with and links to a wider development of the land east of Toton Lane should be explored.
Landowner/Developer/Agent	 Notes that the growth strategy for Greater Nottingham should consider both the locational attributes of particular locations together with the specific benefits (including the ability to minimise harm) of development proposals being put forward. The Aecom report is high level and should be used as such. Each of the four growth options should be utilised but focussing too much on one strategy would result in unsustainable development. A range of sites and locations should be delivered in order to meet housing needs. The most sustainable sites outside the urban area will be needed, which could be new settlements, urban extensions, or smaller scale development in villages.
Landowner/Developer/Agent	 Evidence should be provided to demonstrate that any site is available with willing landowners and is deliverable during the plan period.

Landowner/Developer/Agent	• The area of search preferred is B09. The area is proximate to the nationally and regionally important High Speed 2 rail hub at Toton, where growth and significant investment is confirmed, and to existing road and rail infrastructure. Further, there is a lack of contribution to Green Belt purposes in this location.
Landowner/Developer/Agent	 Consider that the Greater Nottingham Strategic Plan should positively consider the delivery of land to the North East of Toton (reference B09). This land is sustainably located, adjacent to the Nottingham Urban Area. It is close to the strategic road and NET [Nottingham Express Transit] networks. The inclusion of land west of Chilwell Lane is supported as part of the wider B09 Toton North East area. Whilst individually the site is lower than the requisite 450 dwellings, when considered with adjacent promoted land to the west, the entire allocated area could provide for circa 3,000 dwellings. It is noted however that the promoted land west of Chilwell Lane can come forward as part of this wider allocation or independently and is not reliant on third party to land to deliver.
Landowner/Developer/Agent	 Eastwood Extension broad area of search (reference B02) represents a logical location for allocation as it is sustainably located adjacent to Eastwood, a highly sustainable settlement. Of the land within the broad area of search, the land east of Mansfield Road is well linked to existing services and facilities, not constrained by environmental designations and would have a limited impact on coalescence. Circa 350 dwellings could be brought forward with adjacent land to deliver 450 units.
Landowner/Developer/Agent	• Prefer options adjacent to the urban area, particularly to the west and identified as site B08. Account should also be taken of the additional studies we have provided through the 'call for sites' submission.
Landowner/Developer/Agent	 Support the identification of B07 "North of Trowell" and the assessment in the GOS [Growth Options Study]. The identified issues can be addressed through the masterplanning and design of development in this area and are not factors that count against site selection. Development at Trowell could be transformational in terms of the status and performance of the settlement as a highly sustainable location.
	Strategic developments at the edge of the Nottingham urban area and well related to key

Landowner/Developer/Agent	existing and planned transport infrastructure (notably close to the M1 corridor at Watnall - 4.1 and beyond- and HS2 Hub at Toton - BE09) should have a key role in the Growth Strategy.
Landowner/Developer/Agent	 The site is divided between land parcel BO5 (Nuthall Extension) and land parcel BO8 (Land off Woodhouse Way) from figure 2.8 of the Growth Options document. Support these two "Broad Areas of Search" due to their proximity to Junction 26 of the M1 motorway, A6002 and existing employment facilities at Nottingham Business Park and Blenheim Industrial Park. The proposed route for HS2 is expected to remove a significant proportion of developable land and the area should be amended as a result.
Landowner/Developer/Agent	 Consider that the Watnall Extension area of search (reference B04) within the Greater Nottingham Growth Options Study (GNGOS) represents a logical location for allocation within the Strategic Plan. This land is sustainably located adjacent to Watnall and Kimberley, a highly sustainable built area. As set out in the GNGOS [Greater Nottingham Growth Options Study], this broad area benefits from access to an array of services and facilities which will ensure this development is sustainable from day one of the first house being delivered. Fully support the delivery of strategic level growth adjacent to Watnall and Nuthall.
Landowner/Developer/Agent	• The Nuthall Extension (ref. B05) broad area was included in the Aecom Study but is considered below the study's threshold for strategic growth and potentially unsuitable for development due to areas of ancient woodland, the proposed route of HS2, landscape constraints. All of these can be addressed. The Study has missed the potential benefits the Low Wood Road site (B05.1) could deliver in terms of a new park and ride and opportunities to strengthen active travel options through the area. The conclusions of the Aecom Study for site B05.1 are inconsistent with conclusions of other sites and should be afforded very limited weight.
Landowner/Developer/Agent	• The AECOM [consultants] report demonstrates the need for a joint evidence base to coordinate housing delivery for Greater Nottingham which includes Erewash. EBC should utilise the findings to ensure a truly consistent approach to strategic planning across Greater Nottingham.

	 There are a number of sound planning reasons to promote growth in this location, including:
	 The site is situated within the broad location E10 The site is located close to the A62 and junction 25 of the M1. The East Midlands hub station at Toton will be located c. 3km from the site once constructed. The site is located within the Flood Zone 1. The site is located within the Green Belt but performs poorly against the 5 purposes. The site can deliver c. 700 – 800 dwellings, with sufficient buffers from the M1. The site is well connected in terms of walking and cycling.
Landowner/Developer/Agent	 Large strategic sites can be challenging to assemble and deliver, which in turn can put constraint on the delivery of housing. Any strategy should consider how housing supply can be maintained year on year and major sites may have to be brought forward in phases to help delivery, perhaps allowing areas of land with the least constraint to deliver first.
Landowner/Developer/Agent	 In assessing growth options, one of the key issues is the capacity and suitability of the main urban area to accommodate new housing.
	 Green Belt release around key settlements located closer to the main urban area is the correct strategy to pursue.
	 The Greater Nottingham Growth Options Study has identified Erewash/Broxtowe North as a 'Broad Area of Search'. Compared to other areas of search considered, Erewash/Broxtowe North scores particularly well.
Landowner/Developer/Agent	 Growth Option B03, particularly the land highlighted at Figure 1 should be considered favourably. This land has a strong relationship with the submitted site at Stubbingwood Farm, Watnall Road (B03.1), and both would form a logical and sustainable expansion of Hucknall.

Landowner/Developer/Agent	 It is considered the release of the Green Belt in this location is beneficial and justifiable against the exceptional circumstances test in the NPPF [National Planning Policy Framework], with appropriate mitigation. Hucknall is one of the most sustainable urban settlements in Nottinghamshire and offers a prime opportunity to deliver much needed growth in a sustainable location. B02.2: West of Moorgreen Land was identified in BBC's [Broxtowe Borough Council's] 2015 green belt review as the joint preferred site within Eastwood suitable for release from Green Belt.
Landowner/Developer/Agent	 B08 - Land off Woodhouse Way' is the preferred growth option as it is immediately adjacent to the Nottingham Built Up Area and the proposed HS2 line will run through the area. We agree with the assessment of area B08 in the Growth Options Study that this area is a highly accessible location Area B08 is also only 1 of 2 areas of 'high potential' that are immediately adjacent to the Nottingham's Main Built Up Area (the other area is B09 to the south of B08). Land immediately adjacent to the main built up area should be prioritised for development due
	to its proximity to a range of existing services and facilities as well as employment opportunities. We therefore consider that Area B08 should be the preferred growth area. Question OS8: Other Growth Strategy Options
Residents/Specialist Group	• The following options are likely to have least impact on wildlife (however, individual assessments should always be made).
	- Conversion of existing buildings and structures wherever possible
	- Previously developed (brownfield) land
	- Smaller sites in existing built areas of city, towns and villages
	- Rezoning existing built up land where appropriate. E.g. business/retail use to residential.

Other Consultee	Growth Options study was not fit for purpose, deeply flawed and should not take a 'policy off' approach to something as important as the Green Belt.
Duty to Cooperate Council	• The potential locations identified in the 'Growth Options Study' which would be most likely to impact on Amber Valley residents are those within the northern part of Broxtowe Borough (the 'Brinsley Extension' and the 'Eastwood Extension'). However, within those areas, there are only three potential sites that have been submitted to Broxtowe Borough Council and none of these would have any material impact on Amber Valley.
Landowner/Developer/Agent	 Propose inclusion of land to the west of Chilwell Lane as part of the wider B09 potential area for strategic growth.
Landowner/Developer/Agent	 Note that it is important that the actual extent of development area proposed is evaluated in the assessments.
Landowner/Developer/Agent	 Propose inclusion of land to the west of Chilwell Lane as part of the wider B09 potential area for strategic growth for the reasons set out (see representation).
Landowner/Developer/Agent	 Given the scale of need in Greater Nottingham it may be that a combination of different growth strategies is required. This could include urban intensification alongside SUEs [Sustainable Urban Extensions], Village Extensions and New Settlements. This balanced approach would provide a mix of sites attractive to different types of developers, spread new development geographically and importantly deliver a mix of house types to suit different people from city centre living to suburbs to rural communities.
Landowner/Developer/Agent	 Promote two sites: - Land off Nottingham Road, Giltbrook Broxtowe and Colwick Loop Road, Burton Joyce Gedling.
Landowner/Developer/Agent	• The GN [Greater Nottingham] Authorities should prepare a Strategic Plan which would prevent a repeat of the continuous shortfall across the Nottingham HMA [Housing Market Area] and, as a minimum, plan to deliver more homes than the Standard Methodology. This approach should accommodate flexibility and, recognise proper and realistic delivery rates and rates of non-implementation. The strategy would then accord with emerging

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	Government ambitions and requirements, as well as the housing needs for their area.
Landowner/Developer/Agent	 In Erewash the growth strategy should also extend to include locations on the edge of Derby city that benefit from the same advantages as locations on the edge of Nottingham, in terms of ensuring the delivery of sustainable development and the connections to key movement and community infrastructure. The Locko Estate could be brought forward independently, or as part of a wider Strategic Urban Extension including the land west of Acorn Way (which Erewash Borough Council have already set out is a preferred allocation).
Landowner/Developer/Agent	Consider that the growth option that includes Erewash/Broxtowe North as a 'Broad Area of Search', is the correct strategy to pursue.
Landowner/Developer/Agent	 Regard that the Council should consider positively the broad at Watnall (B04), and ensure any land allocated includes our clients land, particularly considering its lack of constraints and availability for development.
Landowner/Developer/Agent	 Consider that the coverage of growth options is comprehensive, although there may be other detailed areas which require assessment at the next stage. However, are concerned about the disparities between the conclusions of the SHLAA [Strategic Housing Land Availability Assessment] and the Growth Options study, with sometimes reaching diametrically opposite conclusions.
	Question OS9: Site Assessments
Resident	 Object to sites adjacent to Ruddington due to impact on local road network and, coalescence. There is need for a fourth Trent crossing. Should support developments close to NET [Nottingham Express Transit], e.g. extension to Kimberley and Eastwood into Erewash.
Residents/Specialist Group	Concerned about the number of and unsuitability of many sites of the sites listed at

	Appendix 2.
Residents/Specialist Group	 Consider that the following sites are unsuitable for development due one of more of the following factors: local amenity value; landscape value and sensitivity; risk of coalescence; a Green Belt or remote location: - B02.2; B09.1; B09.2; B08.1- B08.4; B08.7
Duty to Cooperate Parish	 Is keen to ensure that the feedback from the recent questionnaire survey could be fed into the potential development site assessment process. In particular, B09.1 (Land at Hill Top Farm Stapleford) is existing Green Belt and 85% of respondents to our survey wanted to see this site's continued protection.
Duty to Cooperate Council	 None of the sites submitted that are within the broad areas of search closest to Amber Valley are will have a material impact on Amber Valley (in terms of scale and location).
Statutory Consultee	 West of RAF Newton (R02.2) is preferred, being a surplus public sector brownfield site that would be considered a strategic site to support a sustainable extension to the existing committed development at the Technical Area of RAF Newton.
Statutory Consultee	 Does not have a particular preference for any of the sites but would wish to ensure that the chosen allocations would result in no adverse impact on any designated nature conservation sites or protected landscapes. Would also advise that housing development should avoid Best & Most Versatile Land (BMV) where possible. We advise that the Impact Risk Zones (IRZs) for each potential site should be considered.
	 Any proposal for development should include sufficient information to demonstrate that any potential impacts to the SSSI [Site of Special Scientific Interest] have been adequately avoided or mitigated using appropriate measures and safeguards.
Statutory Consultee	• For new sites in areas of flood risk, would expect to see a full and comprehensive flood risk

	sequential test carried out, and documented and published, as part of the plan making process.
Statutory Consultee	• To provide any guidance regarding any of the sites within Appendix 2 then additional information regarding housing numbers, and employment floorspace to assess the impact on our sewer networks and WwTW [Waste Water and Trade Waste] etc would be required.
Other Consultee	 Regards that the Growth Options Study is not fit for purpose and deeply flawed in its 'Study Principles'. The accuracy of data in the study is, in many cases, inaccurate misleading and / or incorrect. The methodology is incoherent and lacking robust analysis. As such, it would be inappropriate to comment on broad areas until this work is amended.
	• Concerns regarding R15 A453 Corridor and believe that the designation of this site as having High Potential for Strategic Growth is entirely unfounded and inappropriate at this stage especially given the statement in 2.27 of the Consultation that:
	• The Growth Options Study will need to be undertaken again and include a reasoned and justified methodology, which will clearly state how conclusions were drawn, with particular reference to how the ratings for the criterion within the Broad Areas of Search Assessments were made and, in turn, how these inferred the level of growth which was considered acceptable. Furthermore, where relevant, sites within the Green Belt would need to be considered in terms of its current policy context, and the study should not take a "policy off" approach to something as important as the Green Belt.
Landowner/Developer/Agent	 As identified by the Aecom Study, the Hill Top Farm site (ref. B09.1) already benefits from excellent bus and tram services, which would be further improved by the HS2 Hub Station. The site is well related to the urban area and the A52 to the east would prevent development coalescing with Chilwell. There are opportunities for new, publicly accessible open space and extensive new landscaping. The potential for integration with and links to a wider development of the land east of Toton Lane should be explored.
	Comments relate to site B09.2 - land east of Toton Lane. Two areas have been excluded -

Landowner/Developer/Agent	the Japanese Water Garden site and Bardills Garden Centre. Removing these two areas from the green belt as part of the review would encourage comprehensive development. Neither site fulfils any of the 5 principles for including land within the green belt. We suggest that the Bardills Garden Centre and Japanese Water Garden sites should either be included within Site B09.2 or form part of the existing Strategic Location for Growth at Toton (Policy 3.2).
Landowner/Developer/Agent	• Suggests that to meet the needs of Greater Nottingham, new development sites outside the existing urban area will be required. Sites which deliver the most sustainable development, should be progressed. That could be new settlements, urban extensions, or smaller scale development in villages or, most likely, a combination of all. Given the tightly drawn Green Belt boundary around Greater Nottingham, this would almost certainly mean the development of land currently identified as Green Belt if the most sustainable development strategy is to be taken forward.
Landowner/Developer/Agent	• This representation is made in support of site B.04, Common Lane, Watnall, as a 'Potential Area for Strategic Growth'. It is important to maintain the physical separation of the built-up area of Nottingham from Watnall and Kimberley. This is achieved by the M1 and in the future HS2. The site would provide a mix of housing, employment space and green infrastructure. From east to west, this would result in a sequence of motorway, green space/landscaping, housing/green space and employment, with the latter adding to that which already exists. The locational and environmental characteristics of the B.04 area are sufficient to justify an enhancement in its status to an area with a 'High Potential for Strategic Growth'.
Landowner/Developer/Agent	 The identification of 'Awsworth Extension' (Site Ref: BO6) as a 'Potential Area of Strategic Growth' (Village Expansion) is fully supported. Development could be accommodated on land directly to the east of Awsworth without compromising the five purposes of Green Belt outlined in para 34 of the NPPF [National Planning Policy Framework], importantly being able to maintain the physical separation of Awsworth and Swingate.
Landowner/Developer/Agent	 Site B09.2 must be expanded, or land identified separately to include land west of Bramcote. This area to the north east of B09.2 is equally well positioned to deliver
	sustainable development, as described in responses above. Moreover, additional information and material is to be submitted beyond this consultation to support the capabilities of this site to come forward.
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Landowner/Developer/Agent	 Have no preference for any of the sites listed in Appendix 2 but the correct assessment of availability, suitability, deliverability, developability and viability of these sites is critical. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small local, medium regional and large national housebuilding companies and optimise housing delivery. Under the 2019 NPPF [National Planning Policy Framework] the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target.
Landowner/Developer/Agent	 Land at New Farm, Nuthall comprises land parcel B05 but does not feature in Appendix 2 due to the Study's focus on housing rather than employment options which has disadvantaged the site. In light of the inconsistency between Figure 2.8 and Appendix 2; the need for further employment land during the plan period; the introduction of the HS2 line; the history of Green Belt releases to meet identified needs in this location and the conclusions drawn from the highways, flooding and ecology reports. Therefore, request that this site is released from the Green Belt and brought forward as a sustainably located employment site.
Landowner/Developer/Agent	Does not have capacity at present to provide comments on the sites listed in Appendix 2 but will continue to engage with the Plan process and any preferred sites that emerge as the Plan progresses.
Landowner/Developer/Agent	 Site BO5.2 (Land South of Nottingham Road, Nuthall) and site BO8.6 (Land West of Woodhouse Way) are supported because they are considered to be highly suitable for employment land development. The two sites are located approximately 1km apart and share excellent access to the M1 and A6002 and are also a short journey from Toton where the new HS2 hub will be located.
Landowner/Developer/Agent	 Prefer Site B08.6 (Land West of Woodhouse Way) as it is considered to be highly suitable for employment land and, in particular, the accommodation of businesses being displaced at Nottingham Business Park by HS2. The two sites are located adjacent to one another

	and share excellent access to the M1 and A6002 and are also a short journey from Toton where the new HS2 hub will be located.
Landowner/Developer/Agent	 Site B08.3 is preferred but should be extended to include land at Chantry House, to the south unless this land is considered separately. The site does not fulfil the purposes of the Green Belt and is as well positioned to deliver sustainable development as land to the south (allocate land west of Coventry Lane). A strategic Green Belt Review is absolutely critical to informing a robust Strategic Plan. Sustainable sites have been missed from the current Growth Options Assessment. The existing Green Belt designation has led to a disproportionate amount of land having been developed in locations which are less sustainable outside of the Green Belt.
Landowner/Developer/Agent	B02.2 presents an excellent and sustainable option for growth in Broxtowe and is unique in providing employment opportunities in immediate proximity to the site.
Landowner/Developer/Agent	• The strategy should include the delivery of a new community on land East of Toton Lane and new communities on land East of the A453 between Clifton and Ratcliffe Power Station. Both these sites are identified within the Aecom Study as 'suitable' for development and form part of broad areas which have a 'high potential' for strategic growth. (A detailed submission is made separately on behalf of a consortium of landowners which sets out the specific proposals for and benefits of the development of this area).
Landowner/Developer/Agent	• To meet the needs of Greater Nottingham, new development sites outside the existing urban area will be required. Sites which deliver the most sustainable development, should be progressed. That could be new settlements, urban extensions, or smaller scale development in villages or, most likely, a combination of all. Given the tightly drawn Green Belt boundary around Greater Nottingham, this would almost certainly mean the development of land currently identified as Green Belt if the most sustainable development strategy is to be taken forward.
Landowner/Developer/Agent	 G06.1 is safeguarded pending a Local Plan Review. This review provides the means by which the site could deliver additional housing.

	 B02.2 is a good strategic urban extension opportunity which could help address Broxtowe Borough Council's current housing shortfall in the short to medium term.
Landowner/Developer/Agent	 Support Site B08.5 'Extension to Woodhouse Park' as a preferred development site. Consider that any sites which are required to be released from the Green Belt, should be allocated in the Strategic Plan as alterations to the Green Belt need to be assessed through the examination of strategic policies (NPPF [National Planning Policy Framework] paragraph 137).
	Question OS10: Safeguarded Land
Resident	 Advocate protecting the current green corridor and green space separating the Boots/Severn Trent development site and the neighbouring Beeston Rylands.
Resident	 The land north of Toton NET [Nottingham Express Transit] should be safeguarded. It provides a significant community resource.
Resident	 Hilltop Farm Stapleford B09.01 Woodland area home to two protected species & a vast number of species of birds & other wildlife. An area which we must retain & leave to nature.
Residents/Specialist Group	 Safeguarding land creates uncertainty and provides opportunities for speculative planning applications. Should additional or different development sites be needed in the future, these can either be found on a case by case basis or allocated for development as part of the next review of the Local Plan.
Residents/Specialist Group	 For clarity, regard that the plan should either allocate site or not. Do not think safeguarded land should be designated.
Statutory Consultee	Given the pressing development needs for the Greater Nottingham area and to avoid

	 having to undertake more regular Green Belt reviews we are supportive of a plan that safeguards suitable land from development until it is allocated through a review of the Local Plan. While we consider Newton Airfield is suitable for development allocation through the Strategic Plan and within the Plan period. If this is found not to be suitable through the plan preparation, due to the site's location on the edge of a settlement, consideration should be given to safeguarding Newton Airfield. The current consultation on the standard method for assessing housing numbers will further support Newton Airfield being suitable for allocation as a housing growth area.
Other Consultee	 Research should be undertaken to look at all available land within the Nottingham conurbation, including brownfield land, before any land should be released from the Green Belt. It is clear from paragraph 136 of the NPPF [National Planning Policy Framework] that Green Belt boundaries should only be amended in exceptional circumstances.
Duty to Cooperate Parish	 The amount of safeguarded green space should be sufficient to meet the per capita green space requirements (as indicated in the Chetwynd: Toton & Chilwell Neighbourhood Forum Neighbourhood Plan). This green space can be a combination of Green Belt and designated other areas. However, the amount of green space provided within the safeguarded land should be more than sufficient to meet the needs of adjacent populations who have come to depend on this green space for recreation etc, and also to protect wildlife from urban sprawl.
Landowner/Developer/Agent	While safeguarded land may be appropriate in some case, a preferred option would be to designate 'Reserve Sites'. These are sites which are allocated for development in the event that other sites do not deliver dwellings by the anticipated date.
Landowner/Developer/Agent	 Agree that safeguarded land should be identified but sites which may not be delivered as quickly should be safeguarded. States that sites such as Woodhouse Way can be delivered within 3 – 5 years so should be allocated within the Strategic Plan to assist the Council's in meeting the current cumulative shortfall.
	Additionally, safeguarded land required by HS2 for construction could be a suitable for

	development post completion of HS2 so this should be a consideration in the Strategic Plan.
Landowner/Developer/Agent	• Land released from Green Belt but safeguarded enables housing shortfalls to be met promptly without the need to undertake further Green Belt reviews. When undertaking Green Belt reviews - the revised Green Belt boundary should be drawn at a point where the functionality of Green Belt is served. In some cases, this will mean a sizeable area of land is released which may exceed the current plan housing requirement. In such circumstances Safeguarding policies provide a means by which the Council can control when additional land comes forward for development. This is the approach which should be taken.
Landowner/Developer/Agent	• Support the principle of safeguarding land within the green belt for future development within the terms set out in the NPPF [National Planning Policy Framework]. The location of land to be safeguarded should be determined on the basis of a Green Belt review and the spatial strategy considerations.
Landowner/Developer/Agent	 Regards that he Plan should allocate the land necessary to achieve the growth requirements and should determine firm new boundaries for the Green Belt in the Plan.
Landowner/Developer/Agent	• Considers that safeguarded land should be identified for development well beyond 2038.
Landowner/Developer/Agent	 If the detailed housing needs assessment concludes that it would be pertinent, given the recognised need for Green Belt release, to allocate safeguarded land beyond the Plan period, then the Erewash/Broxtowe North 'Broad Area of Search' would be the preferred location.
Landowner/Developer/Agent	 To accord with the NPPF [National Planning Policy Framework], the GNSP [Greater Nottingham Strategic Plan] should include safeguarded land to accommodate development needs beyond the plan period. The process of identifying the land to be safeguarded should be undertaken as an extension to the site allocation process once

	the growth strategy has been defined.
Landowner/Developer/Agent	 If land at Chantry House, Coventry Lane is not allocated within the Strategic Plan then it should unequivocally be designated as Safeguarded Land within the Green Belt for longer term development.
Landowner/Developer/Agent	 When undertaking Greenbelt reviews the revised Greenbelt boundary should be drawn at a point where the functionality of Greenbelt is served. In some cases, this will mean a sizeable area of land is released which may exceed the current plan housing requirement. In such circumstances Safeguarding policies provide a means by which the Council can control when additional land comes forward for development. I see no reason why this approach should not be used within the Greater Nottingham Strategic Plan.
Landowner/Developer/Agent	 If land west of Bramcote is not allocated within the Strategic Plan, then it should unequivocally be designated as Safeguarded Land within the Green Belt for longer term development.
Landowner/Developer/Agent	• Consider safeguarded land to be a proactive and positive step, to ensure flexibility and negate future Green Belt reviews. Clearly Green Belt is a significant barrier to growth, so including safeguarded land outside of the Green Belt allows the Councils to act quickly in the event of either increased housing demand or if housing is delivered at rates slower than expected. Safeguarded land should not replace the need to allocate circa 15% above housing need, to ensure deliverability, robustness and to boost significantly the supply of housing.
Q	uestion GBI1: Strategic Green and Blue Infrastructure Assets
Resident	 Considers that there is a need to keep the current green corridor between Beeston Rylands and the Boots/Severn Trent development as Strategic Green and Blue Infrastructure for human recreation/well-being and also wildlife movement.
Resident	 The "Horseshoe" from the River Erewash north of Chetwynd Barracks and round to

	Attenborough Nature Reserve proposed in the Chetwynd Neighbourhood Plan should be created.
Residents/Specialist Group	Regards that there is a need to include ancient woodland, ancient trees and ancient wood pasture as key Green Infrastructure Assets.
Residents/Specialist Group	• Support reference to the focal areas identified in the Biodiversity Opportunity Maps and note that these should be taken forward and given weight when planning BGI [Blue and Green Infrastructure] at a strategic level.
	• The full hierarchy of nature conservation sites should form the 'backbone' of strategic GBI [Green and Blue Infrastructure]. Other sites, such as Local Nature Reserves, country parks, mapped city open spaces, plus all wildlife sites and formal/ informal reserves can all be valuable components of strategic BGI [Blue and Green Infrastructure].
Residents/Specialist Group	 We would like to see protection of existing GI [Green Infrastructure] assets including trees and woods and targets set for expansion of tree canopy cover.
Residents/Specialist Group	 Green spaces linked by the River Leen and Daybrook are important as well as the Nottingham and Beeston Canal, the Erewash Canal, Tinkers Leen, Fairham Brook Grantham Canal, and, most of all, the River Trent.
	The importance of the Environment Agency's Trent Gateway Project should be explicitly recognised in the final version of this report.
Other Consultee	• The strategy should be aiming to extend and link up the green spaces into the heart of the conurbation, but green corridors need to be good for wildlife as well as for exercise. It should also be noted that gardens have an important role to play providing the boundaries allow movement between the gardens.
Landowner/Developer/Agent	Considers that the broad categories cover what should be defined as strategic Green and

	Blue Infrastructure.
Landowner/Developer/Agent	• Not all of the areas shown are of strategic importance, but green and blue infrastructure can provide a positive framework for potential new developments. At present though large areas of the identified green and blue infrastructure assets are not accessible to the public, which is a key policy objective.
	 Notes that new development can provide funding for long term maintenance of green and blue infrastructure assets which immediately adjoin the new development areas. Funding could be used for provision of footpaths, woodland and hedgerow planting and other biodiversity measures, as well as parking. Development and green and blue infrastructure assets should be seen as complimentary land uses.
Landowner/Developer/Agent	Encourage the reinforcement of the strategic nature of the Trent Valley GBI and seek to ensure it is protected and enhanced. Use BOM [Biodiversity Opportunity Mapping] to inform GBI [Green and Blue Infrastructure].
Landowner/Developer/Agent	• The principle that GBI [Green and Blue Infrastructure] can increase the value of development is accepted. It often requires upfront planting and preparation and this impacts on cash flow and the viability of the development. This will need to be fully considered through the viability assessment. A minimum percentage of GBI [Green and Blue Infrastructure] could be included in a policy.
Duty to Cooperate Council	 Consider that the provision of new housing and economic development within areas adjacent to Amber Valley (identified as Strategic GBI [Green and Blue Infrastructure]) could potentially contribute to the protection and enhancement of green and blue infrastructure through the provision of or financial contributions towards new tree and woodland planting, where would be appropriate or practical taking into account landscape, flood risk and ecological considerations.
Duty to Cooperate Parish	Toton Fields LNR [Local Nature Reserve], Toton Washlands, and Hobgoblin Wood &

	Chetwynd Playing Fields (both within the Chetwynd barracks site). Also, the 'horseshoe' in the barracks linking from Hobgoblin Wood through to the extended Toton Fields LNR [Local Nature Reserve] (see the Chetwynd: Toton & Chilwell Neighbourhood Forum Neighbourhood Plan).
Statutory Consultee	 Supportive of the principles behind GBI [Green and Blue Infrastructure] and the need to make space for water / treat water as a resource and are further supportive of incorporating SuDS [Sustainable Drainage Systems] within developments whilst highlighting the need to ensure that surface water is discharged to the most appropriate outfall as identified by the Drainage Hierarchy.
Statutory Consultee	 The Nottinghamshire Biodiversity Opportunities Map should be the basis of identifying areas that should be identified as Green and Blue Infrastructure, together with discussion with key environmental stakeholder groups.
Statutory Consultee	 Historic England does not propose any areas, corridors or individual open spaces that should be identified as strategic GBI [Green and Blue Infrastructure]. However, do advise that rivers in the Trent Valley have the potential for palaeolithic remains and the synergies of any GBI [Green and Blue Infrastructure] with the historic environment should be considered in the preparation of the Plan.
Statutory Consultee	 For greater clarity, in addition to specifically highlighting and identifying the River Trent, the plan should clearly identify canal corridors as specific blue infrastructure assets. At present they are only shown as 'sub-regional green infrastructure corridors'.
	Question GBI2: Strategic Allocations and Policies
Resident	Considers that there are opportunities to be inventive. Suggests water taxis.
Resident	Regards that cycle-ways should not be confined to locations that are within green space.

	The Plan should also mention the continuing need to retro-fit cycle-ways into urban areas and should further ensure that developers provide cycle-ways
	 Cycle-ways should meet the standards specified in the Department for Transport's "Cycle Infrastructure Design" LTN 1/20.
Residents/Specialist Group	• The first approach should be to avoid doing harm in the first place - mitigation, is always second best option, whilst compensation is a last resort, in line with the 'mitigation hierarchy'.
	 Nature recovery networks with excellent habitat connectivity are key. Need to avoid damaging or isolating existing sites and habitats and form bigger, better and more joined up sites, using strategic development policies where appropriate.
	• Avoid creation of small, isolated GBI [Green and Blue Infrastructure] that provide only marginal wildlife benefit.
	Proposals put forward must provide for sufficient long-term funding for management.
	• SUDS [Sustainable Drainage Systems] and other Natural Flood Management strategies can be used to create wetland habitat.
	Consider natural regeneration, rather than planting.
	 Avoid neat & tidy solutions, which are often resource heavy and not truly sustainable and only of limited ecological value.
	Road verges and other transport corridors support habitats.
	Brownfield sites can be a valuable wildlife resource.
	 Proposed development should take forward the approaches to creating Nature Recovery

	Networks outlined in this Wildlife Trusts publication.
Residents/Specialist Group	 Respecting and protecting landscape value and maximising the biodiversity potential of the Green Belt.
Other Consultee	 Derbyshire County Council has a 'Greenways' initiative creating green routes wide enough to act as wildlife corridors as well as Active Travel routes. Proposed development should include such corridors.
	 New or expanded road developments should have to make provision for connecting green infrastructure. Too often major routes e.g. A52 act as movement barriers to both wildlife and Active Travellers.
Other Consultee	Regards that brownfield land should be prioritised.
Statutory Consultee	 This Plan should contain a blanket policy which states that new development (including strategic sites) will not impact existing sites of importance, or green and blue infrastructure (including wildlife sites), by way of installing an undeveloped buffer zone.
Statutory Consultee	 Development designed around the existing GBI [Green and Blue Infrastructure] assets and landscape features making the most of the landscape to ensure that multi-functional space and benefits are achieved and result in a positive impact on the development, subsequently being valued by the local resident. This will need to be a key element of developing site Masterplans for the strategic sites, incorporating site wide infrastructure including drainage and SuDS [Sustainable Drainage Systems].
Statutory Consultee	 Biodiversity and environmental net gain can encourage investment in new and existing GBI [Green and Blue Infrastructure] assets and therefore needs to be considered in parallel.
	Green infrastructure strategies can help to ensure that GBI [Green and Blue Infrastructure]

	 enhances and protects nature conservation assets at a strategic level. A sufficient evidence on how best to protect and invest in the green infrastructure network is essential. The aim would be to develop an understanding of the whole network within the Plan area which would help to direct development to the right locations to protect and enhance GI [Green Infrastructure], and to also guide off site net gain to the right areas to make the biggest impact. Development Briefs/Concept statements can distil the high level green infrastructure principles in a Green Infrastructure Strategy, to influence site planning and design. How to achieve net gains would fit in well with a GI [Green Infrastructure] concept statement.
Duty to Cooperate Council	 The Consultation identifies land adjacent to Amber Valley (the northern part of Broxtowe Borough) as an Urban Fringe Management Area, including the River Erewash valley. It is considered that the provision of new housing and economic development within these parts of the Strategic Plan area could potentially contribute to the protection and enhancement of green and blue infrastructure through the provision of or financial contributions towards multi-functional GBI.
Duty to Cooperate Council	 The term 'healthy landscapes' describes places designed to promote good health and wellbeing. The use of landscape improves people's physical and mental health and has an important role that well-planned and designed landscapes play in improving public health.
Duty to Cooperate Parish	 The natural environment should be enhanced and any impacts should be minimised and mitigated. Active travel routes should be linked/adjacent to green corridors. De-culvert streams, where feasible, (e.g. Moor Brook in Chetwynd Barracks) to help enhance and increase biodiversity net gain.

	Developers should be required to provide a 10% biodiversity gain, so the provision of GI [Green Infrastructure] (which isn't necessarily the same as the provision of quality habitat) should always increase biodiversity not "at the very least, reduce biodiversity loss".
Landowner/Developer/Agent	 Proposed developments within close proximity to identified Green & Blue Infrastructure can formalise and safeguard such assets through planning by incorporating suitable buffers with biodiverse planting to soften the transitions encouraging wildlife transit. Careful consideration must be given to the identification of new such GBI [Green and Blue Infrastructure] assets to avoid conflict between otherwise suitable housing sites.
Landowner/Developer/Agent	The proposed strategic growth locations should have master plans prepared for them that identify how Green and Blue Infrastructure objectives are to be met, and propose specific proposals for delivery of G&BI [Green and Blue Infrastructure] proposals.
Landowner/Developer/Agent	• Overall, very much support the objectives of, and specific initiatives set out within, this section of the GOC [Growth Options Consultation] document.
Landowner/Developer/Agent	 Where proposed development is adjacent to or contains designated Green or Blue Infrastructure, development schemes should be designed in such a way as to enhance and protect the assets: this could include buffers or enhancements as an integral part of the development. Such features could form an important centre point to new development and its associated open space, providing design inspiration for the rest of the site. There is also the opportunity to increase new green-blue infrastructure as an integral part of new strategic development. This could be linked to the proposed new requirements to deliver environmental net gain as part of new development.
Question GBI3: Biodiversity Net Gains	
Resident	 A requirement for areas of Green Space should be included. Gardens with fencing should take into account the routes and habits of wildlife (e.g. hedgehogs). There should also be an increased number of hedgerows and wildflower meadows.

Resident	 Regards that development can only minimise loss. All streets should be tree lined with native species and green spaces should be large enough to encourage wildlife and be linked with green corridors.
	• Further notes that water runoff from buildings and hard surfaces should be controlled and diverted into ponds.
	 Homes should be designed to include suitable nesting spaces for birds, etc.
Residents/Specialist Group	 It should be ensured that all irreplaceable habitats (e.g. ancient woodland and ancient trees) are not lost to development. These habitats should be excluded from net gain calculations.
	 Suggests the promotion of tree planting and woodland creation. Further suggests adopting tree strategies covering management of trees and set targets for their expansion – puts forward a 30% target tree canopy cover in new developments.
Residents/Specialist Group	• Regard that developments should never be allowed to isolate, damage or destroy valuable existing wildlife habitats or sites and that they should include wildlife friendly features. Considers that gains could be made through larger gardens, more substantial open spaces that are managed appropriately for wildlife and linked to BGI [Blue and Green Infrastructure] and countryside.
	• The loss of wildlife habitats cannot be easily replaced. Therefore, the planning authority should develop policies that concentrate on funding significant habitat developments.
	• There should be a requirement for monitoring and enforcement action and the Plan should also consider making targets specific and measureable so that these can be objectively assessed.
	Biodiversity Opportunity Maps should inform opportunities for net-gain.
Duty to Cooperate Parish	 Notes that development should always maintain and protect priority habitat, and should mitigate the adverse effects of increased footfall and domestic pets. In addition, residents of the new development have a right to have access to nature, particularly those in deprived

	 communities. Enhancing existing habitat elsewhere should be the last option adopted, and is often too easy a fix for many developers. Modern more enlightened methods of urban extension allow for both residents and wildlife. This must be tied in to the emerging Environment Bill and its proposals for Biodiversity Net
Duty to Cooperate Council	 Gains. Subject to the Environment Bill, policies could be introduced in the Strategic Plan and/or subsequent Local Plans which require either the provision of suitable measures to enhance biodiversity within or adjacent to new development sites and/or financial contributions towards the provision of such measures in other suitable locations.
Other Consultee	 Policy should not deviate from 10% net gain as set by Government. Applying national policy provides a level playing field. Local Nature Recovery Strategies will help developers to locate their sites strategically to avoid biodiverse sites that would be difficult to achieve net gain on. Significant additional costs associated with biodiversity gain, which should be fully accounted for in the Councils viability assessment.
Statutory Consultee	 Natural England's Biodiversity Metric Tool can be used by developers and LPA's [Local Planning Authorities] to calculate biodiversity net gain.
Statutory Consultee	 Within strategic sites biodiversity net gains should be incorporated in masterplans. Land may be required for GBI [Green and Blue Infrastructure] at the outset and contribution made to ensure that the spaces are delivered in coordination with the development process. Where these corridors include SuDS [Sustainable Drainage Systems], the required attenuation infrastructure and flow controls will need to be constructed prior to development of the site to prevent an increase in flood risk.
Statutory Consultee	• The Biodiversity Metric 2.0, can be used to measure gains and losses to biodiversity resulting from development. Advise that this metric is used to implement development plan policies on biodiversity net gain.
	CIEEM [Chartered Institute of Ecology and Environmental Management] has developed

	 'good practice principles' for biodiversity net gain, which can assist plan making authorities in gathering evidence and developing policy. Policy should set out the approach to onsite and offsite delivery.
	Off-site contributions may be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan.
Landowner/Developer/Agent	 Notes that the Environment Bill is yet to be finalised. However, the 'Natural Environment' white 9 paper should be referred to.
	• The Plan must ensure that sufficient land is allocated based on the relevant net developable area. DEFRA's [Department for Environment, Food and Rural Affairs] metric effectively renders sites with high biodiversity ratings unviable as the quantum of land needed for offsetting exceeds the available space onsite. Also the cost to purchase credits to pay for offsetting offsite will constitute a significant cost burden which is highly likely to make many such schemes unprofitable. New Development can achieve net gains in biodiversity through the use of planning conditions.
	Delivery could involve onsite mitigation or offsite. Any emerging policies relating to biodiversity net gain should be in accordance with emerging government proposals.
Landowner/Developer/Agent	 In some cases, when the biodiversity value of a site is above average, it could be more difficult to achieve a 10% net gain on site. Therefore, to avoid sites being rendered undevelopable or severely restricted in their capacity, we consider that it is imperative for all Councils, in conjunction with Natural England and the Nottinghamshire Wildlife Trust, to establish a strategy for delivering off-site biodiversity enhancements. It will be extremely difficult to secure Section 106 contributions for off-site habitat creation if new locations have not been identified for biodiversity credits to be spent and improved for these purposes.
Landowner/Developer/Agent	• The ability for each site identified for strategic growth to achieve net gains will vary according to the biodiversity value found on each site prior to development. Therefore, to avoid sites being rendered undevelopable or severely restricted in their capacity, a strategy

	for delivering off-site biodiversity enhancements should be developed.
Landowner/Developer/Agent	 Masterplans for the strategic locations should identify how net-gain would be achieved and demonstrate that delivery is within the control of the promoter or that they can work in partnership with the authority or third parties to deliver the gains.
Landowner/Developer/Agent	Notes that most developers and landowners are keen to promote biodiversity, as it makes their developments more attractive and enhances value. Measures to improve biodiversity can easily be built into new developments.
Landowner/Developer/Agent	 Within strategic schemes, the delivery of Biodiversity Net Gains should be on site through multifunctional Green Infrastructure spaces. For smaller sites financial contributions could be made in order to achieve the required net gain where there is little or no space for biodiversity.
	Question GB1: Principle of the Nottingham-Derby Green Belt
Resident	 The Green Belt has stifled growth and regeneration projects and has not benefited Nottingham or its greater zone from taking advantage to make employment and housing projects.
Resident	The Green Belt should be maintained as it forms a significant resource for local people and wildlife.
Resident	The Green Belt must be maintained.
Duty to Cooperate Council	 Development in locations closer to existing services and facilities, but within the Green Belt, could make a more effective contribution to a sustainable pattern of development than development in locations further away from services and facilities, beyond the outer Green Belt boundary. However, given national planning policy, any proposed development in Green Belt locations should only be supported where 'exceptional circumstances' can be

	demonstrated and in this event, any development should either provide or make financial contributions towards the enhancement of land to be retained within the Green Belt, including through additional tree planting where appropriate.
Other Consultee	• The Green Belt area is important to the city and other local residents and many parts can be accessed by on-road and off-road cycling and walking routes including the general rights of way network. All of these are vital to individuals' physical and mental health and need to be well-designed, well-promoted and well-maintained, to make the most of their potential benefits in all seasons, not just the drier and warmer months.
Other Consultee	• The Green Belt is a vital tool to achieving efficient use of land within urban settings and protecting the surrounding countryside. As such, Green Belt principles should absolutely be maintained in local planning policy.
Landowner/Developer/Agent	 Notes that where the Green Belt between Nottingham and Derby meets the five tests, specifically preventing coalescence of either City it should be retained. However, where the Green Belt tightly bounds lesser outlier towns reasoned Green Belt release may be deemed suitable.
Landowner/Developer/Agent	 There should be a "fundamental review" of the Green Belt, including the question of whether or not the principle should be maintained.
Landowner/Developer/Agent	 The 2006 Green Belt Review should be updated as it does not account for the proposed HS2 line. HS2 will now also serve to separate Nottingham and Nuthall and will provide a new defensible and permanent Green Belt boundary in accordance with paragraph 139 of the NPPF [National Planning Policy Framework]. Area 1 'Nottingham to Ilkeston and Long Eaton' which Site B08.5 is located within, should now be assessed differently and should be lower performing. Site B08.5 is well served by public transport and should there be considered for residential development as a priority.
Landowner/Developer/Agent	 Assuming that the general principle of the Nottingham-Derby Green Belt is maintained, it is critical that its role and extent is considered in the context of other strategic policies and

	needs. A fundamental review of the Green Belt in the Greater Nottingham area (both around Nottingham and Derby) is essential. BHL [Bloor Homes Ltd] would very much welcome the opportunity to discuss the growth strategy and the role that their land can play in addressing the identified housing needs in the area. BHL (Bloor Homes) have significant land interests in the area.
	Question GB2: Approach to the Green Belt
Resident	• From the figures provided, it would seem more consistency in the release of Green Belt required.
Residents/Specialist Group	The principle of the Green Belt should be maintained.
Residents/Specialist Group	• The Green Belt limits urban sprawl which protects wildlife sites, habitats and GI [Green Infrastructure] corridors. It is important that the Green Belt remains intact.
Residents/Specialist Group	 Notes that the Green Belt is important for local recreation including walking/cycling routes and acts as a rights of way network.
Residents/Specialist Group	Regards that development should not be directed towards the Green Belt, which is already much diminished.
Residents/Specialist Group	 It would not be acceptable if Green Belt policy drives a disproportionate amount of development to areas in Rushcliffe beyond the outer Green Belt boundary; valuable wildlife sites and corridors are just as likely to be harmed, or lost, both within and beyond the Green Belt limits.

Duty to Cooperate Parish	• Notes that the Green Belt must have, and continue to have, some intrinsic biodiversity value. Converting some of it to a park or country park, doesn't mean it retains the same biodiversity value. Since Broxtowe has actually converted more of its Green Belt to non-Green Belt land than any of the authorities (as a %), perhaps it should be less willing to convert more.
Duty to Cooperate Council	• Development in locations closer to existing services and facilities, but within the Green Belt, could make a more effective contribution to a sustainable pattern of development than development in locations further away from services and facilities, beyond the outer Green Belt boundary. Any proposed development in Green Belt locations should only be supported where 'exceptional circumstances' can be demonstrated and in this event, any development should either provide or make financial contributions towards the enhancement of land to be retained within the Green Belt, including through additional tree planting where appropriate.
Statutory Consultee	Before removing land from Green Belt, development should consider local infrastructure including sewerage provision.
Statutory Consultee	The Plan will need to ensure the historic environment has been fully considered should land need to be released from the Nottingham-Derby Green Belt.
Other Consultee	Green Belt boundaries are tightly drawn and therefore some release will be necessary in order to meet LHN [Local Housing Need] in full. A strategic review should be undertaken, considering land adjacent to urban areas, and towns and villages which are inset within the Green Belt.
Other Consultee	 The principle of the Nottingham-Derby Green Belt should be maintained where the five purposes for Green Belt as set out in 2019 NPPF [National Planning Policy Framework] (para 134) are served.
Other Consultee	This should only be considered once all other viable options have been exhausted.

Landowner/Developer/Agent	 Green Belt protection must be measured against long-term benefits of sustainable development. Not allowing development on Green Belt land would necessitate locating development some distance from the more sustainable settlements. Strategic plans can designate new areas of Green Belt to compensate for losses. Allocating insufficient land in the Green Belt will increase development pressures in non-Green Belt locations. Not utilising Green Belt land is likely to lead to unsustainable transport patterns, increased congestion, and likely to not to take advantage of economic opportunities associated with existing and planned transport infrastructure.
Landowner/Developer/Agent	 Consider the principle of this Green Belt should be maintained and the vast majority of Green Belt land should retain this designation.
	• Consider there are exceptional circumstances that justify changes to Green Belt boundaries, as defined in para 4.14 of the GOC [Growth Options Consultation] document. Broxtowe is a heavily constrained Authority with only a limited amount of land suitable for development, most of which is designated as Green Belt, and these circumstances form part of the exceptional circumstances case for Green Belt review.
	 The Broxtowe Local Plan Part 2 Evidence Base includes the Greater Nottingham and Ashfield Green Belt Assessment Framework (February 2015). The assessment only covered a part of the Broxtowe Green Belt and was highly selective, focussing on a large swathe of land to the east of the M1 – zone 27 (plus 28 & 26) but not to the west. Therefore, the site was not reviewed and no commentary provided.
	• It is evident from the characteristics of the Cossall Road site that it makes a weak contribution to Green Belt purposes due to its landscape containment and clear boundaries.
Landowner/Developer/Agent	• The principle of the Green Belt should be maintained. However, it should be critically reviewed and land west of Bramcote should be released.
	Considerations should include "sustainable patterns of development" such as public

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Landowner/Developer/Agent	transport accessibility and "economic potential" linked to "opportunities presented by HS2".
Landowner/Developer/Agent	 Regards that there should be a Green Belt review as land will need to be released from Green Belt to meet development requirements.
Landowner/Developer/Agent	• The Nottingham-Derby Green Belt Review 2006 should be reconsidered and a new independent, robust and transparent assessment of Green Belt land within the Greater Nottingham area should be undertaken to properly assess the five Green Belt purposes outlined in paragraph 134 of the NPPF [National Planning Policy Framework].
Landowner/Developer/Agent	 Consideration should be given to the potential for areas within it to be released for development where this is sustainable and does not conflict with the purposes of the Green Belt.
Landowner/Developer/Agent	• The principle of the Green Belt is valid but need to be reviewed to meet the growth requirements.
Landowner/Developer/Agent	 Propose that the Green Belt policy designation be removed particularly where it is of low - medium importance and replaced with other protection policies.
Landowner/Developer/Agent	The benefits of an element of Green Belt release around key settlements outweigh those of locating development outside the Green Belt.
Landowner/Developer/Agent	 Necessary substantial amendments to Green Belt boundaries will need to be done to ensure that the housing needs of the GNA [Greater Nottingham Area] are met. Growth should be concentrated along strategic growth corridors where there are existing or proposals to improve public transport, on growth sites adjoining the main urban area, at key settlements and other settlements.
Landowner/Developer/Agent	• The consultation document states that the authorities will review the Green Belt and consider sites for allocation, in case they "may produce a more sustainable outcome" than

	allocating only non-Green Belt sites (Paragraph 4.16). Respondent observes that Chetwynd Barracks provides an opportunity to deliver a significant scale of development on a highly-sustainable, non-Green Belt site, the partial delivery of which is already enshrined in the adopted LP Pt2 [Local Plan Part 2].
Landowner/Developer/Agent	 There should be a new Green belt review due to HS2 progress, and HS2 and M1 motorway would make a more ideal Green belt boundary.
Landowner/Developer/Agent	 Exceptional circumstances exist to justify an element of Green Belt release, which should focus on key settlements such as Awsworth.
Landowner/Developer/Agent	 Not all Green Belt may perform the functions intended by Green Belt and such sites should be considered for release and where appropriate be made available for housing or other uses. Conversely non Green Belt land may not necessarily be suitable for development and could be designated Green Belt.
	The release of safeguarded land should take priority over allocating new Green Belt or Non-Green Belt land as the principal of development has already been accepted.
Landowner/Developer/Agent	 The key consideration that requires Green Belt to be reviewed is the need to secure sustainable growth and critically to reduce CO2 [carbon dioxide] emissions through development.
Landowner/Developer/Agent	 Urban Capacity assessments should support any release of Green Belt sites for development. It is also important that the Strategic Plan sufficiently addresses the other requirements of NPPF [National planning Policy Framework] paragraph 137 to increase densities on existing and proposed sites and produce a Statement of Common Ground with neighbouring authorities.
	 Figure 4.1 of the Growth Options document states only 47ha of land has been released from the Green Belt within Nottingham City, lower than other authorities. As Nottingham City is at the top of the proposed 'Hierarchy of Centres', Green Belt adjacent to the Main Built Up Area should be released from the Green Belt as a priority. As one of the highest

Resident	 Nottingham and its surrounding boroughs need to designate land for new parks or playing fields Trees, bushes and wild flowers need to be grown or planted in 'wasteland' or parks to create cleaner air, protect bees/insects/birds.
	Question GB3: Offsetting Losses to the Green Belt
Landowner/Developer/Agent	 Considerations should include "the proportionality of development in villages beyond the Green Belt" and accessibility to "key infrastructure routes".
Landowner/Developer/Agent	On the basis that exceptional circumstances for Green Belt release can be demonstrated as we suggest above, the other considerations that direct and govern Green Belt release must be considered through an updated Green Belt assessment.
Landowner/Developer/Agent	 A sensible and pragmatic approach to the Green Belt is required therefore, to ensure Greater Nottingham grows in the most sustainable way. Not utilising Green Belt land is likely to lead to unsustainable transport patterns, increased congestion, and likely to not to take advantage of economic opportunities associated with existing and planned transport infrastructure.
Landowner/Developer/Agent	 While it may be possible to deliver a large proportion of the required growth in locations beyond the Green Belt, the sustainability impacts of doing so in contrast to releasing land from the Green Belt should be considered. key considerations: ability of sites to connect into the public transport network and provide reasonable journey times, potential to expand villages with good public transport.
Landowner/Developer/Agent	The Plan should consider the changed circumstances arising for those areas / sites compromised by the proposed route for HS2, and this should be a major consideration when determining which parcels of land are released for development.
	performing areas, sites within area B.08 should be prioritised above sites in other less sustainable search areas. Additionally, the proposed HS2 line that will cut through area B.08 will provide a new defensible Green Belt boundary.

Residents/Specialist Group	Offsetting could provide habitat for biodiversity purposes. However, it will need to recognise the principles of nature recovery networks and creating wildlife areas that are 'Better, Bigger and More Connected', expanding on existing wildlife sites and creating a variety of habitats, rather than investing in isolated patches.
Residents/Specialist Group	 Regards that it is difficult to see how landscape and amenity value lost due to development could be offset; open countryside cannot be replaced.
Duty to Cooperate Council	Given the competing pressures of recreation and biodiversity, any development of Green Belt land needs to be extremely well planned. Since most Green Belt land is agricultural land, there may be opportunities to create viable Nature Recovery Networks, but new ways of managing urban green space need to be sought.
	Local Authorities should have a designated Biodiversity Officer to ensure the necessary level of Biodiversity Net Gain.
Duty to Cooperate Council	 Development in locations closer to existing services and facilities, but within the Green Belt, could make a more effective contribution to a sustainable pattern of development than development in locations further away from services and facilities, beyond the outer Green Belt boundary. However, any proposed development in Green Belt locations should only be supported where 'exceptional circumstances' can be demonstrated and in this event, any development should either provide or make financial contributions towards the enhancement of land to be retained within the Green Belt, including through additional tree planting where appropriate.
Statutory Consultee	• This should be looked at in the context of the Nature Recovery Network.
Statutory Consultee	• Notes that the consultee has a dataset which the GN [Greater Nottingham] Authorities may find very useful in terms of identifying areas where environmental improvements could be made to offset any potential losses of Green Belt land.
Landowner/Developer/Agent	 Proposals for urban extensions should include for generous new areas of open space and show how access can be maintained to the countryside where it currently exists to mitigate for the changes.

Landowner/Developer/Agent	 Does not consider that is essential to off-set losses to the Green Belt by designating Green Belt elsewhere.
Landowner/Developer/Agent	 Improvements can be identified by assessment work and secured by site-specific policies and legal agreements, following Green belt release.
Landowner/Developer/Agent	• A fundamental review of the Green Belt is essential to achieve the required sustainable growth of the GN [Greater Nottingham] Area. Should the principle of the Nottingham-Derby Green Belt be maintained, it is important that this is considered in the balance of other strategic policies. The need to promote sustainable patterns of development should be taken into account.
	• The existing Aligned Core Strategies demonstrated that the careful application of the planning balance, alongside the need to meet housing requirements, provides the exceptional circumstances to remove land from the Green Belt and allocate it for development. The emerging Strategic Plan will need adopt the same approach should the Green Belt be maintained in order to deliver sustainable growth.
Landowner/Developer/Agent	• Notes that while Green Belt is not strictly an environmental designation, losses can be mitigated by provision of high-quality publicly accessible open space. This can be achieved on new developments or on remaining Green Belt or greenfield land. Much Green Belt land, particularly agricultural land, is of poor environmental quality and not publicly accessible. This can be improved by ensuring high quality publicly accessible open space as part of new strategic development and/or Councils could seek to improve public access within maintained Green Belt or greenfield land.
Landowner/Developer/Agent	• The release of land west of Bramcote could increase accessibility to other areas of Green Belt adjacent, expand woodland and use agricultural land for habitat creation.
Landowner/Developer/Agent	• Development will be required to address any environmental designations through mitigation/off-setting and provide access to the wider rights of way network where possible.
Landowner/Developer/Agent	

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	Improvements to the environmental quality and accessibility should be made in such a way that they do not encroach upon sites that are prime candidates for development.
Landowner/Developer/Agent	• With regard to land at Hill Top Farm, Stapleford, opportunities include "landscaped open space" such as "space for provision of a woodland burial site", "additional woodland planting", "new footpath links" and "biodiversity net gain".
Landowner/Developer/Agent	• With regard to land at Low Wood Road, Nuthall, "new areas of open space" could be created.
Other Consultee	• Notes that the Plan should recognise the need to re-wild areas close to urban development as 'wildlife banks' to offset the major loss of biodiversity on farmland.
Other Consultee	 New or enhanced 'Green' infrastructure: Woodland or other 'appropriate' planting, biodiversity improvements, landscape and visual impact enhancements. New walking or cycling routes.
	Question EMP1: Employment Land and Office Space
Resident	 In paragraph 5.8, after "Nottingham has good public transport and potential to expand the tramway (NET)", insert "Nottingham has good cycleways, and potential to improve and expand the cycleway network".
Resident	 EMP1 employment space needs will need to be reassessed in the light of COVID and more homeworking.
Resident	The increase in working from home during COVID19 lockdown demonstrates that a significant increase in large centres of office space may not be required. Small, decentralised offices (a halfway house between working from home and working in the large office) must be a feature of developments.

Resident/Specialist Group	 Accessibility should be added to the factors in Paragraph 5.6, particularly access by sustainable and active travel. Attractive, safe routes that encourage people to move away from car travel should be promoted. Adequate secure cycle parking should be provided, at convenient locations.
Resident/Specialist Group	 The Greater Nottingham Strategic Plan points out at 5.6 that the current basis for employment land calculations, the 2015 ELS [Employment Land Study] Study, is out of date. Respondent agrees with this and conclude that it is unwise to assume more employment land will be needed - given current trends, less demand is far more likely.
Duty to Cooperate Council	 Potential for new office development around the proposed HS2 Hub Station at Toton and the necessary improvements to transport links to it from the surrounding area, including the potential for an enhanced bus service along the A610 corridor from Ripley and Heanor (as suggested in the recently published transport plan by Midlands Connect) could offer readily accessible new employment opportunities for Amber Valley residents.
Duty to Cooperate Parish	 In addition, the Plan should factor in the likely scenario of more people working from home & local offices. The pandemic has shown that working from home "stretches" the space within the home, and perhaps enhanced local office space would be better. There is likely to be increased drift away from city centre working towards local working, either at home or nearby 'hot desking' facilities for those who choose not to work from home.
Statutory Consultee	 For questions EMP1 & EMP2, respondent suggests that office location should be easily accessible by public transport and that active and sustainable transport should be available in support of a zero carbon city.
Other Consultee	Provision for access by sustainable and Active Travel should be included as well as attractive and safe routes that encourage people to move away from car travel should be promoted.
Other Consultee	 Notes that central government has announced several changes to the way employment and office space is viewed from a planning perspective with the creation of use Class E. Some consideration should be given to safeguarding office space rather than permitting

	any use within the revised Use Class E. Uncontrolled uses within Class E could detrimentally harm the accessibility to office-based jobs. Consideration of the new use classes should be considered when researching the minimum amount of employment and office space.
Landowner/Developer/Agent	 States that the minimum amount of employment land and office space should not just be based on the factors set out in paragraph 5.6 because they do not take account of the loss of employment space caused by HS2. Furthermore, there has not been enough consideration has been given to the provision of Class B2 / B8 (E Class) employment space in the Greater Nottingham area in the plan period.
Landowner/Developer/Agent	Agree with what has been put forward.
Landowner/Developer/Agent	 In recent years, there has consistently been a shortfall in the availability of good quality Class B2 / B8 land across the conurbation, and this has influenced the levels of take-up within the wider market area. Furthermore, there is little in the emerging Plan by way of recognition of the requirements of strategic and local distribution requirements. Accordingly, the minimum amount of employment land and office space should not be based on the factors set out in paragraph 5.6 alone because they do not fully take into account all market or need considerations.
	Question EMP2: Office Development
Resident	Office development should not be focussed in Nottingham City Centre. Other locations and local extensions must be part of the developments.
Resident	There are many struggling centres in the Broxtowe area which require support to grow businesses.
Resident	Seeks the provision of more office space in the City Centre and along the A453 link to the

	M1.
Resident	 Considers that office development in Nottingham City Centre is really poor as compared to so many cities in the UK.
Resident	• Nottingham is beginning to become a failing city due to no ambitious ideas.
Residents/Specialist Group	 The city centre has in general the best links for sustainable travel especially when combined with restrictions on motor traffic for air quality and carbon reduction reasons. For major more peripheral locations, such as the planned HS2 East Midlands Hub at Toton, good cycling and walking access should be an integral part of any development proposals.
Residents/Specialist Group	 Focus on the city centre and existing smaller centres rather than creating competing hubs at free-standing business parks and the Toton HS2 hub.
Duty to Cooperate Parish	• The issues relating to questions EMP1-7 do not directly impact on Amber Valley, but the potential for new office development around the proposed HS2 Hub Station at Toton and the necessary improvements to transport links to it from the surrounding area, including the potential for an enhanced bus service along the A610 corridor from Ripley and Heanor (as suggested in the recently published transport plan by Midlands Connect) could offer readily accessible new employment opportunities for Amber Valley residents.
Duty to Cooperate Parish	 The Toton Innovation Campus at the Hub Station offers a significant opportunity for employment, mainly office based. There should not be any further office development in the City centre.
Statutory Consultee	 Office location should be easily accessible by public transport and that active and sustainable transport should be available in support of a zero carbon city.
Statutory Consultee	 The Plan will need to ensure the historic environment has been fully considered in respect of preferred options for sites for office development. Recommend that any site

	assessment follows the five steps set out in advice note.
Landowner/Developer/Agent	• Existing established employment locations, such as Nottingham Business Park, should be considered for their expansion opportunities prior to new locations being assessed. Consideration should be given to the impact that HS2 construction will bring to existing employment locations such as Nottingham Business Park. Given that this location is an established business park, then the opportunity to regenerate and expand the existing business park should be a priority. Also consider that the land immediately to the north of Nottingham Business Park provides a suitable opportunity to re-provide the buildings lost through HS2 construction.
	• Furthermore, it is understood that good quality land/ new commercial space remains in short supply and that land to the west of Nottingham which is located next to the M1 will be the more favoured option for occupiers.
Landowner/Developer/Agent	 Consideration should be given to the impact that HS2 construction will bring to existing employment locations along the proposed route. Given that this has already been chosen as a sustainable location for business considers that land in the surrounding area (north of Broxtowe) should be seen as a prime location for development. Its unique location between the M1 motorway and the A610 further amplifies the suitability of this site as a new employment location. Furthermore, it is understood that good quality land/ new commercial space remains in short supply and that land to the west of Nottingham which is located next to the M1 will be the more favoured option for occupiers.
Landowner/Developer/Agent	 A range of locations and sites should be identified that can cater for a wide range of requirements. The city centre should remain the primary focus for new office development, although the location at Toton in relation to the benefits that HS2 can bring. can offer opportunities. The proposals at Catstone Green, propose a small managed business workspace development alongside the local centre Hub to contribute to the critical mass of activity at this location and to provide opportunities to live and work locally.

Landowner/Developer/Agent	 Key transport corridors along the strategic highways network, particularly along the M1, should be explored. When considering the current relatively low levels of employment in the sector. It is vital that the GN [Greater Nottingham] Authorities promote ambitious plans for growth in this sector over the plan period, now and in the emerging Strategic Plan. Regard that the lack of references and focus on logistics in the Growth Options document is a glaring and wholly unacceptable omission. There is great concern that the emerging Strategic Plan and evidence base that might inform it, will not properly take account of the rapidly changing economic circumstances nor the rapidly evolving logistics sector – whether in the quantity or quality of employment land brought forward.
Que	stion EMP3: Driving Innovation and Supporting Business Growth
Resident	 Start-up businesses of all sorts should be encouraged through grants, affordable office space and office infrastructures. Universities are not the only source of innovation.
Resident	The cities of Nottingham and Derby are closely meshed.
Resident	Provide 1-2 years' rate relief for start-up companies. Expand the LEP [Local Enterprise Partnership] area to include Nottingham town centre and BioCity.
Residents/Specialist Group	 Queries how we can drive innovation and encourage start-up companies, including expanding the role of the universities in the area's economy?
Duty to Cooperate Council	Whilst universities are important, not all jobs will require degree level education. It will continue to be important to provide other workforce training opportunities e.g. via apprenticeships and provide a Skills & Training Academy at the Innovation Campus.
Duty to Cooperate Council	The potential for new office development around the proposed HS2 Hub Station at Toton

	and the necessary improvements to transport links to it from the surrounding area, including the potential for an enhanced bus service along the A610 corridor from Ripley and Heanor could offer readily accessible new employment opportunities for Amber Valley residents.
Statutory Consultee	• The Plan may wish to consider the option of providing for the reuse and appropriate adaptation of any heritage assets currently used for traditional manufacturing industries to provide for start-up companies in the future should markets dictate that direction.
Other Consultee	 Using the model of Biocity and Medicity seek to create more innovation hotspots with easy access to the Universities and local populations. The plan should recognise that many of the higher paid, higher skilled work is carried out by residents who live outside the city and commute in to work. The plan should focus on stimulating innovation amongst existing employers in the city to raise skill levels generally.
Landowner/Developer/Agent	 Regards that provision of new employment opportunities at Land at New Farm, Nuthall would support innovation and encourage start-up companies by expanding the range and quality of industrial units in this area.
Landowner/Developer/Agent	The University of Nottingham will need to be directly involved in the economic growth of Greater Nottingham, maximising opportunities for inward investment, attracting the best and most talented students to Greater Nottingham, supporting new employers to important economic growth areas, and graduate retention. Nottingham University owned land west of Bramcote presents an opportunity to support the delivery of economic growth aligned with the regional high speed rail hub at Toton by offering expertise and direct investment but also offering up their land asset at Bramcote to assist in the delivery of housing in this area, increasing flexibility or in replace of housing that it may not be possible to deliver at Toton, directly adjacent to the hub, given the imperative to maximise the economic opportunity in this location.
Landowner/Developer/Agent	 The key role the planning system can help is in identifying and supporting sites that provide opportunities for start-ups and identifying sites alongside Universities and other major research institutions that offer potential for spin-out companies. Specific designations could be applied to encourage firms to locate in zones close to these institutions and flexible planning management polices applied, such as through LDOs

	[Local Development Orders].
Question EMP4: Regeneration Priorities	
Resident	 The response notes that offices should strictly be in the city centre. Warehouses and Factories need to be easily accessible and therefore they should be in Broxtowe and Rushcliffe. There should be a focus on the J24 and J26 areas for industrial growth.
Resident	 In-depth support is needed for regeneration priorities to develop and succeed. This could be in education but also getting into the job market (how to behave, what to expect etc) Role models need to found and championed.
Resident	 The focus needs to be on the Nottingham/Derby corridor.
	 Further considers that Nottingham's two Universities should be encouraged to focus on developing local businesses as well as support manufacturing industries in Derby and to contribute innovative ideas to develop hi-tech businesses.
Other Consultee	 A good education & skills training is the best route out of poverty. Therefore, better support for schools in disadvantaged areas is required both for pupils and parents. Better paid job opportunities are required, as well as improved quality housing. Brownfield sites should be developed/used first to provide well paid jobs with appropriate training support for the workforce.
Duty to Cooperate Council	 Regards that extending the existing partnership working arrangements between local authorities across the Greater Nottingham and Derby HMAs [Housing Market Areas] will help to share information and evidence to support appropriate policies and proposals to enable businesses to address climate change and their environmental impact.
Statutory Consultee	 Notes the importance of sustainability within regeneration projects so that they can support long-term growth, well-being and the economy. It is therefore important that surface water is managed sustainably, looking for opportunities for it to be re-used, or

	incorporated into GBI [Green and Blue Infrastructure] before being discharged in accordance with the drainage hierarchy, rather than to sewers. The development of SuDS [Sustainable Drainage Systems] as part of wider Green spaces that provide multi-functional space, enhance the local environment and provide a setting / character for the new development.
Statutory Consultee	 The Plan may wish to consider the option of providing for the reuse and appropriate adaptation of any heritage assets as a regeneration priority. Historic England's Heritage Counts information on Heritage in Commercial Use (2018) and Heritage and the Economy (2019) may be of assistance in developing any strategy for heritage led regeneration within the Greater Nottingham area.
Other Consultee	 Considers that regeneration should be prioritised in locations with excellent public transport access. Notes that the city has lost considerable office space to housing through permitted development rights and it would be worth a study to understand whether this has been beneficial or detrimental to the economy.
Landowner/Developer/Agent	 Regeneration should focus on areas of greatest need. The IMD [Index of Multiple Deprivation] identifies that locations in the west and south of the city are particularly disadvantaged. There are opportunities to gear the opportunities that arise from strategic growth to the needs of local areas, and our strategy to Optimise Social and Economic Benefits at Catstone Green aims to identify the potential scale of benefits, and proposes an Employment, Skills and Training Plan to help target local needs.
Question EMP5: Climate Change	
Resident	• There should be better explanation as to how climate change will affect individual people.
Resident/Specialist Group	Encourage employers to locate where active and sustainable travel are possible. Make provision within the work place for secure cycle parking, showers and lockers. Charging

	points should be provided for electric cycles, not just for electric cars.
Resident/Specialist Group	 Should not allocate land for employment far away from where most people live and in locations poorly connected to sustainable travel options such as free-standing business parks or the HS2 hub.
Duty to Cooperate Council	 Extending the existing partnership working arrangements between local authorities across the Greater Nottingham and Derby HMAs [Housing Market Areas] will help to share information and evidence to support appropriate policies and proposals to enable businesses to address climate change and their environmental impact.
Landowner/Developer/Agent	• The key potential through the planning system to influence business is through setting environmental performance standards for new buildings and their operation, and also through setting site design requirements to ensure that sites can optimise benefits from passive solar design and are resilient to future changes. There may be advantages to businesses by combining with new housing areas for instance in the provision of heat and power such as Combined Heat and Power networks.
Landowner/Developer/Agent	• By creating new employment opportunities, it is considered that modern purpose-built accommodation can be made available which will increase the prospects of new sites being developed. This will reduce their impact on the environment and respond to the carbon agenda.
Landowner/Developer/Agent	 By providing new employment development opportunities, modern purpose-built accommodation can be made available, increasing the prospects of new sites being developed which will reduce their impact on the environment and respond to the carbon agenda. However, WBD's [the company's] view is that the Building Regulations are the best 'tool' to achieve the objectives of carbon control and efficiency in the buildings themselves.
Duty to Cooperate Parish	 Encourage the co-location of jobs, homes, services and facilities to reduce the need to travel. Use of green energy, and reduce bills by turning their lights off at night! Use of Modern Methods of Construction when building new facilities. Energy efficient homes &
	buildings Encourage the use of green rooves and/or green walls.
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Statutory Consultee	 Processing water for consumption and then processing wastewater utilises a significant amount of energy, by ensuring that developments are designed to be water efficient to reduce the quantity of water that needs to be processed, SuDS [Sustainable Drainage Systems] and the Drainage Hierarchy will also assist in reducing the processing need.
Other Consultee	• The Plan should locate where active and sustainable travel are possible along routes with good air quality as well as make provision within the work place for secure cycle parking, showers and lockers for those choosing Active Travel.
Other Consultee	 The D2N2 [Derby, Derbyshire, Nottingham and Nottinghamshire Local Enterprise Partnership] programme should invest in advisers to support businesses and identify opportunities for savings and efficiencies and develop this growth industry locally.
	Question EMP6: Safeguarding Employment Land
Residents/Specialist Group	 There is great uncertainty about the nature of employment (apart from home-working), including the possibility that some measure of manufacturing may return following both Brexit and changing international relationships. There may be a case for releasing lesser quality sites unless they contribute in some way to regeneration.
Residents/Specialist Group	Release sites which have not found any takers for many years, but carry out a separate assessment before allocating these sites for housing as some of them are remote form services.
Duty to Cooperate Council	 The potential for new office development around the proposed HS2 Hub Station at Toton and the necessary improvements to transport links to it from the surrounding area, including the potential for an enhanced bus service along the A610 corridor from Ripley and Heanor (as suggested in the recently published transport plan by Midlands Connect) could offer readily accessible new employment opportunities for Amber Valley residents.

Landowner/Developer/Agent	 There is a need to maintain sites of importance for employment unless they are of poor quality, have environmental issues that make them unsuitable and constrained or where the alternative use provides significant benefits over that achieved by continuing in employment use.
Landowner/Developer/Agent	 The elements of Nottingham Business Park unaffected by HS2 should be safeguarded as an established employment location. Further land to the north should be allocated to allow for the relocation of businesses displaced by the proposed route for HS2.
Landowner/Developer/Agent	 Blenheim Industrial Park should be safeguarded as an established employment location. Further land to the west should be allocated to allow for the extension of this successful and sustainable employment generating site, especially now that HS2 is set to radically change the circumstances of this locality and redefine the Green Belt boundary on the western side of the Nottingham Urban Area.
Other Consultee	• The assessment of "good quality" should be set against the objectives of this plan. Reducing deprivation, improving skills, and increasing productivity.
	Question EMP7: Rural Area
Residents	 There is an opportunity to make a strong rural diversification by promoting orchard farms, bee farms, fish farms, ostrich farm and turning existing farms into tourist sites that could act as education centres.
Resident/Specialist Group	Queries how rural diversification can be supported?
Other Consultees	 Seeks the provision of high-speed internet access and training however this is not a priority currently.

Duty to Cooperate Council	Unlikely to have any direct impact on Amber Valley.
Duty to Cooperate Parish	 Planning policies should encourage appropriate diversification through re-use of otherwise disused buildings to support the local economy and provide job opportunities locally.
Statutory Consultee	• The Plan may wish to consider the option of providing for the reuse and appropriate adaptation of any heritage assets in rural areas in order to support rural diversification. Historic England's information on caring for rural heritage may be of assistance at this time.
Statutory Consultee	 The Plan should consider how we can support farming and rural diversification. This should include policy that allows affordable housing for those priced out of the villages they live and work in. Rural policy needs to incorporate considerations such as supporting the rural economy, transport, waste disposal, access and healthcare. The policy should also be mindful of localised challenges.
	• There should be emphasis on locally produced food and local businesses and envisage that farmers will be able to provide BNG [Biodiversity net Gain] sites and help others offset commodities such as carbon.
Landowner/Developer/Agent	 Holds that rural diversification depends on farms and other rural businesses being able to change the use of rural property to ensure the continued viability of their business and to ensure continued provision of sustainable employment to local people.
Landowner/Developer/Agent	 Appropriately funded transport infrastructure measures should be included as part of an overall package of measures to make this an attractive corridor for growth.

Question H1: Affordable Housing	
Resident	 Considers that affordable housing not delivered enough as developers suppress build-out rates in order to maintain high house prices. Affordable housing should be mixed and not be different in design from market housing and that household rents should be set by household income.
Resident/Specialist Group	 The issue should not be left to the market but instead be based on a needs assessment (not an estimate of market demand).
Resident/Specialist Group	 Holds that any approach is likely to be overridden by later consultation.
Other Consultee	 Policy approach to affordable housing should be consistent with the 2019 NPPF's [National Planning Policy Framework's] promotion of affordable home ownership by requiring at least 10% of new dwellings built to be available for this tenure leaving only the remainder for other affordable housing tenures.
	 Viability testing should assess the cumulative impact of affordable housing provision, policy compliant standards, infrastructure and other contributions so that there is sufficient incentive for a reasonable landowner to bring forward their land for development.
	 The full economic consequences of the Covid-19 pandemic are as yet unknown and such uncertainty means that a larger viability buffer is necessary.
Other Consultee	 There is a need for affordable housing but this has to be placed in areas where the people who wish to take advantage of it want to live, be accessible to facilities and accessible to

	jobs and facilities by walking, cycling and public transport.
Duty to Cooperate Council	 Advises on a number of publications that may give further guidance on the matter.
Duty to Cooperate Council	Unlikely to have any direct impact on Amber Valley.
Duty to Cooperate Parish	 Ensure/enforce developers meet their commitment to the provision of affordable housing in full and not accept section 106 monies instead.
	 Seek to provide the highest percentage of affordable housing appropriate for the area where development is taking place.
	 Encourage movement onto the housing ladder by Affordable to Buy schemes such as Part- Rent-Part-Buy.
	Discourage use of Affordable Homes by families who can afford Market Rent/Prices.
	 Provide a strategy and vision for new council housing developments.
Landowner/Developer/Agent	 This Plan should ensure caution if setting affordable housing requirements for new developments. Any affordable housing requirements must have due regard for viability, in particular having regard for development contributions. If affordable housing requirements are too high, it can impact viability and thus delivery. Overtly onerous development requirements can delay developments whilst contributions are negotiated, or entirely prevent them from coming forward. Given this, robust evidence is needed to support the affordable housing requirements for new developments.
	 Given the complexities and variations across the Plan area, it is considered affordable housing requirements could be delivered through subsequent Part 2 Local Plans.

Landowner/Developer/Agent	 To achieve a step change in the provision of affordable housing there is a requirement for an overall quantum increase in the rate of housebuilding across the GNA [Greater Nottingham Area] and that will mean releasing more deliverable sites from the Green Belt. It will also mean increasingly that the provision of affordable housing will need to be underpinned by government grants through Homes England.
Landowner/Developer/Agent	 Levels of affordable housing can continue to vary between authorities but should be clearly determined against local viability assessments and tested through Local Plans, and flexibility needs to be provided to each major proposal to ensure development is able to be developed viably over the life of the schemes.
Landowner/Developer/Agent	 The current approach remains a reasonable starting point. A mix of tenure types should be required, with appropriate flexibility, including the provision of discounted market sales. Up front certainty over the starting point for the mix should also be provided to assist in masterplanning sites.
Landowner/Developer/Agent	 Affordable Housing policy requirements should take account of First Homes and plan wide viability before setting the percentage requirement.
Landowner/Developer/Agent	 Affordable housing requirements should be expressly referenced to C3 residential dwellings only for the avoidance of doubt.
Landowner/Developer/Agent	 Policy should be pragmatic acknowledging that one size fits all approaches to affordable % and tenure are not always viable nor what Housing Associations want. Policy guiding a % unless material factors prove why this isn't achievable constitutes a sensible approach. A discretionary approach empowering each respective Local Authorities' capability to establish their own discretionary affordable housing requirement is sensible. The Core Strategy should not seek to impose a top down affordable housing requirement.
Landowner/Developer/Agent	The Plan should ensure caution if setting affordable housing requirements for new

	 developments. Any affordable housing requirements must have due regard for viability, in particular having regard for development contributions. If affordable housing requirements are set too high, it can impact viability and thus delivery. Overtly onerous development requirements can delay developments whilst contributions are negotiated, or entirely prevent them from coming forward. Given this, robust evidence is needed to support the affordable housing requirements for new developments. Affordable housing requirements could be delivered through subsequent Part 2 Local Plans.
	Question H2: Housing Size, Types and Tenure
Resident	 There should be a higher percentage of smaller houses suitable for older people (such as bungalows) to encourage them to move out freeing up the larger homes for younger families. The amount of housing to rent should not be increased. Many people living in market rented housing do so because there is an inadequate supply of housing (that they have a large enough deposit) to buy. Build to Rent should be encouraged and Buy to Let strongly discouraged.
Resident	 Few options for housing in the city Areas like Bulwell, Arnold, West Bridgford, Embankment, Beeston, and Clifton could have more modern apartment blocks and more studio apartments. Build upwards.
Local/Specialist Group	 New development might be matched against the needs of the community rather than the priorities of the developer. Nottingham City Homes are setting a good example for good quality public sector housing.

Duty to Cooperate Council	Unlikely to have any direct impact on Amber Valley.
Duty to Cooperate Parish	 To ensure development meets the needs of the local community, two/three bedroom properties are needed for first/last time buyers/renters in terms of affordability as opposed to four to six bedroom ones. The Plan should discourage "housing size creep" where properties are extended adding new bedrooms etc. if the mix of properties in the area does not warrant it.
Other Consultee	The policy approach of the GNSP [Greater Nottingham Strategic Plan] should be flexible and not overly prescriptive.
Landowner/Developer/Agent	 Note that client's generally support an aspiration to deliver balanced communities across the Greater Nottingham area. Their view is that it will be useful for a policy to identify the broad housing mixes that the authorities would expect to see delivered. This should be linked to the outcomes of relevant evidence base (and we note that a Greater Nottingham and Ashfield Housing Needs Assessment report has been prepared). However, Avison Young's clients also observe that a policy governing housing mix should include sufficient flexibility, and recognise that there may be circumstances where different proportions of size, type and tenure might be suitable (for example, due to site-specific characteristics, or the presence of heritage assets on a site).
Landowner/Developer/Agent	 Ideally housing size should be determined by the market. It should be acknowledged that there is a growing demand for homes with additional room (s) which can be used as study and/or provide flexible accommodation. Local planning authorities should not include policies which place unnecessary controls on housebuilders to build a certain housing mix.
Landowner/Developer/Agent	 The strategic growth locations should provide a range and mix of housing to meet the needs that arise through the Housing Market Assessment (HMA) and be fine-tuned to meet the specific needs of the locations, subject to their individual viability. The larger sustainable urban extensions should provide for a range of types and tenures

	and offer opportunities for a self-build and community housing schemes where a need is identified. The aim is to create a rich and varied community that reflects the broad range of local needs and requirements. This can be agreed through site master plans, which also allow the overall viability of proposals to be tested and agreed.
Landowner/Developer/Agent	 Housing needs vary across the Plan area. As such the Council should avoid prescribing a strict housing mix, based on a fixed point in time. Flexibility must be ensured to ensure that any eventual housing mix has regard for both updated local need evidence, but also market forces and viability. Again, overtly stringent housing mix requirements can delay and prevent development.
	• Due to the variations across the Plan area, this is again something that could be considered at a District level.
Landowner/Developer/Agent	 Policies which prescribe market housing mix or tenure should be avoided. These sorts of policy skew market forces which are best placed to respond to the plurality of housing need. Prescriptive housing mix policies are unresponsive. Evidence on mix, type and tenure should ideally take the form of guidance.
Landowner/Developer/Agent	• Do consider that it would be suitable for the Strategic Plan to implement a blanket requirement for housing size, types and tenures. A blanket approach will lead to inflexibility and housing mix should therefore be led by the housing market at the time of application. The authorities could produce a supporting supplementary planning document which could set out indicative mix for the affordable housing element where the SHMA [Strategic Housing Market Assessment] or other evidence has indicated that a certain mix is required. The mix for private sale dwellings should not be prescribed, because developments are usually delivered according to the prevailing market demand.
Landowner/Developer/Agent	 Planning policy should only set broad principles for the size, type and tenure of dwellings. Completions should be monitored as an additional tool for the market when making decisions.

Landowner/Developer/Agent	 The Council should avoid prescribing a strict housing mix, based on a fixed point in time. Flexibility must be used to ensure that any eventual housing mix has regard for both updated local need evidence, but also market forces and viability. Again, overtly stringent housing mix requirements can delay and prevent development. Due to the variations across the Plan area, this is something that could be considered at a District level.
Landowner/Developer/Agent	 In order to provide for a mix of housing in order to meet governments intentions, the plan should include the allocation of sites for retirement home and custom/self-build homes as well as specifically allocating a greater number of smaller sites.
	Question H3: Meeting the Needs of Different Groups
Residents	 A comment regards that student accommodation should be provided around the universities to free up rented houses for families and graduates. Another respondent notes that student housing should be provided by the education establishments and regards that there is no reason why students should play a role in new housing developments. A comment further notes that the needs of the elderly and disabled should be met by suitable housing designs within the new housing to be built. "Ghettos" of housing designed for specific age groups or abilities should be avoided.
Other Consultees	 If the Councils wish to adopt optional standards for accessible and adaptable dwellings, or for national space standards, then this should be based upon evidence as required by national policy, and be tested for viability. Furthermore, many older persons will not move from their current home but will make adaptations as required to meet their needs.
Duty to Cooperate Council	

	Unlikely to have any direct impact on Amber Valley
Duty to Cooperate Parish	 Older people – by ensuring homes are accessible and adaptable/adapted. Purpose built retirement living may be appropriate for some, but not all older people want to be segregated from younger members of the community, so a mixed approach will be needed.
	 People with disabilities – by ensuring planning policies require more than a fixed percentage (e.g. 10% or higher if required) of homes in large developments are 'accessible and adaptable'.
	 Students – developers see building student accommodation as a cash cow at the expense of the needs of the local community. Building student accommodation (occupied for as little as 6 months of the year) doesn't meet the housing needs of the local community living in the area permanently. New developments for student living should be subject to an impact assessment on local housing needs on a case-by-case basis. Where such a development is approved, the universities & colleges (whose students will occupy it) should be required to provide the equivalent of section 106 monies to fund affordable housing for the local community.
Landowner/Developer/Agent	 Housing needs of students can be met largely through purpose built student accommodation, managed by the Universities, and should therefore be encouraged in local planning policy. This delivery must not be restricted and will in in turn maintain family accommodation elsewhere.
Landowner/Developer/Agent	• The requirements provide for a range of needs and reflect the housing needs of the HMA [Housing Market Area] and local area.
Landowner/Developer/Agent	Should include the allocation of sites for retirement home and custom/self-build homes as well as specifically allocating a greater number of smaller sites.
Landowner/Developer/Agent	

	 Notes that there should be an inclusion of policies to support the delivery of housing for groups with particular needs subject to certain criteria. For the larger sites and SUEs [Sustainable Urban Extensions] the inclusion of an element suitable for the different groups could be encouraged but should not be required. Furthermore, any requirement that a certain percentage of properties should be built to higher accessible and adaptable standards should be fully evidence and viability tested.
Landowner/Developer/Agent	Regards that the only way to start to deliver an increasing proportion of specialist housing for the rising elderly population is through amendments to the Green Belt as part of sustainable extensions to the main urban area and key settlements where they can also access wider facilities and are well served by public transport. This requirement could be included in development briefs for such growth sites.
Landowner/Developer/Agent	• Elderly and disabled housing needs are in part catered for by Build Regulations Part M4. Sheltered accommodation with ward assisted living is however a specialised sector that few family house builders will have experience working with. Where a shortfall in ward assisted or sheltered accommodation exists the council should look to incentivise the delivery of such schemes. Where demand for specialised housing need exists a relevant planning policy for specialised living could be considered however adaptation of existing housing stock will have a large part to play in addressing evidenced specialised housing needs.
Landowner/Developer/Agent	It is critical that the plan addresses the housing needs for older people.
Question H4: Gypsies and Travellers	
Residents	A comment notes that sites should be located in the rural area.
Duty to Cooperate Council	Unlikely to have any impact on Amber Valley

Duty to Cooperate Council	 Response provides list of additional evidence documents which could be considered/referenced.
Duty to Cooperate Council	Refer to a number of publications on the subject matter.
Duty to Cooperate Parish	 Provide suitable dedicated affordable sites (possibly subsidised), with appropriate facilities, for these (often temporary) members of the community to use, in order to discourage occupation of other land that is not suitable to live on however temporary it might be. The sites could provide built accommodation for regular returners as well as large enough pitches for travelling caravans. The cost of providing such sites should be offset against the clear-up costs when 'illegal' sites are vacated.
Landowner/Developer/Agent	 Provision should be made where the requirement is identified and sites are available/suitable.
	Question CTC1: The Network and Hierarchy of Centres
Resident	 Notes that a successful city has a tier system made up of areas of importance. The secondary areas are areas of importance and provide employment and shopping and I would consider; Netherfield, Arnold, Hucknall, Bulwell, Hyson Green, Beeston and West Bridgford to form this. Third in the tier system, is the areas where people can go for alternative mainstream or cultural shopping and is somewhat busy but has less visitors than the secondary areas, this should include; Giltbrook, Ilkeston, Stapleford, Long Eaton, Clifton, Sneinton, Cotgrave, Bingham, Carlton and Sherwood.
Resident	 Regards that the present structure is appropriate. However, notes that it is possible that the mix of services provided at each level is no longer appropriate. For example, the provision of "shared offices" at local centres would build on the experience of working from home in COVID19. In addition, the Local Centres could be used as "collection points" for internet shopping deliveries, new developments should provide Local Centres

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	within a short walk of all households.
Other Consultee	Considers that the hierarchy is appropriate.
Duty to Cooperate Council	• Considers that the current network and hierarchy of centres is appropriate and should be retained; however, the network and hierarchy do not include existing retail parks and it is noted that the Giltbrook Retail Park provides a wide range of retail and other outlets which are also within close proximity to Amber Valley. The role of this and other similar locations in the retail network and hierarchy should therefore also be addressed in the Strategic Plan.
Duty to Cooperate Parish	 Notes that development within Chetwynd Barracks and at the Hub Station will see local centres in these areas as identified in the Chetwynd: Toton & Chilwell Neighbourhood Plan.
Statutory England	 The network and hierarchy of centres set out in Figure 7.1 is noted but it is not clear how key towns in Erewash (Ilkeston and Long Eaton) would fit with this if Erewash is to be considered in relation to the growth options for Plan. It is recommended that the situation is clarified as the Plan progresses.
Local/Specialist Group	See no reason to change hierarchy
Quest	ion CTC2: Nottingham City Centre and the Town and District Centres
Resident	Provide more cycle racks/stands for those using bikes for shopping.
Resident	• A climate needs to be created where local innovative retailers and cafes and restaurants are attracted and can thrive. This inevitably means lower property rents and business rates.

Resident	Arnold, Beeston, Bulwell and Hucknall need to have more high street shopping options as well as more tourist attractions.
Resident	 Town centres have to expect fewer offices & shops and convert space presently used for these services into living accommodation. Regards that it is not the responsibility of the planning system to support an outmoded shopping model.
Resident	 Bulwell, Hucknall and Beeston should have apartment blocks and also encourage more student blocks with increased night-life economy and more leisure attractions and eateries.
Residents/Specialist Group	Holds that by providing attractive affordable accommodation and green spaces in town centres so that the centres continue to have a purpose and life.
Residents/Specialist Group	• Walking and cycling within and to these centres should be safe and attractive. Adequate provision and appropriate cycle parking should also be provided and there should be more incorporation of green space due to less demand for shop space.
Residents/Specialist Group	Careful application or permitted development should be ensured.
Duty to Cooperate Parish	 The Plan should provide a range of high quality cultural, social & leisure facilities within or close by the centres to increase footfall. It should also discourage any further 'out of town' shopping centre development and instead encourage outlets to occupy the centres. Shopping outlets would need to have a unique 'offer' not available online to compete with this increasing mode of purchase. Bespoke items and/or an exceptional personal customer service perhaps?
Statutory Consultee	 Notes that as the need and demand for retail space comes under increasing challenges it is important that plans facilitate community and cultural facilities within town centres as these help drive footfall and maintain the attractiveness and vibrancy of centres. The

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plan should promote such facilities, and encourage meanwhile uses which help activate
vacant units and spaces.
 Notes that the Plan may wish to consider the option of providing for the reuse and appropriate adaptation of any heritage assets to assist with changes in shopping habits. It is recommended that the Plan draws on the experience of ongoing and completed Nottingham High Street Heritage Action Zone projects.
• Considers that the best way to help the hierarchy of local centres is to concentrate redevelopment within the city centre and that assistance for town and district centres would be best delivered at a local level, tailored to the individual needs of those centres.
• Regenerate the City, Town and District Centres and create/enhance GBI routes to and from them to turn them into hubs for exercising and socialising.
 Make walking and cycling within, to and from these centres safe and attractive. Provide adequate and appropriate short and longer-term secure cycle parking, including undercover provision.
• The viability of town centre relies on their ability to adapt. Change from retail to employment, arts, cultural and other uses will be the key to maintaining vitality and viability. Also ensuring that people live close to local facilities will encourage their use.
stion CTC3: Acceptable Uses on the Edge or Outside of Centres
 Local Impact thresholds should not be set. If the shopping model has changed, the centre should be protected only by being more efficient. Click & Collect can equally well apply to Town Centre stores.
 Impact assessments should be carried out and there should be a presumption against

Residents/Specialist Group	• Development on the edge or outside the centre tend to attract more private car use and contribute to congestion. Development should be controlled if it will contribute to climate change or hamper the related carbon neutral target. This means that it is also very important to include good standard cycle and pedestrian access.
Other consultee	 The thresholds should be based on proximity to the City Centre as well as the scale of the development, and, that Retail Impact Assessments should consider the likely effects of development on the city centre regeneration strategy and impact on the planned investment.
Other consultee	Such developments increase car use contributing to congestion and air pollution.
	Include Active Travel access as an integral part of these plans.
Duty to Cooperate Parish	Unable to comment on what the threshold should be & why
Landowner/Developer/Agent	 Regards that existing centres should be protected against being undermined by development outside defined centres, where the centre could have accommodated the development. This ensures facilities are concentrated and supports viable centres. This should not affect the provision of new centres or nodes in the network.
Landowner/Developer/Agent	 In the light of recent trends in lifestyle changes and technological changes (working from home, internet shopping and home deliveries), city and town centres as well as out of town/edge of town retail parks are under threat and are likely to require major remodelling and refocussing over the next generation.
	• The impacts of this will be felt on commuting patterns and therefore transport and transport infrastructure requirements and wider land use planning including reuse and regeneration strategies for city and town centres across the GNA [Greater Nottingham Area] will need to be reviewed.

	Question D1: Achieving Well Designed Places
Resident	Consistent design principles and standards should be used, including BREEAM [Building Research Establishment Environmental Assessment Method] standards. However, a multiplicity of building designs should be encouraged, as should building to customer specifications.
Residents/Specialist Group	Consistent design principles should be applied to encourage walking/cycling with a good standard of wider network connections.
Residents/Specialist Group	Supports. Recommends CPRE [formerly the Campaign to Protect Rural England] design guides.
Other consultee	• These tools should include use of: neighbourhood plans, BREEAM [Building Research Establishment Environmental Assessment Method] standard for commercial buildings, local lists for non-designated buildings of heritage importance to an area, design review panels for significant individual buildings or large-scale development, the National Design Guide (2019) and Living with Beauty document (2020).
Other consultee	• The 'Building for a Healthy Life' best practice guidance could be used. Any local guidance should be specific to the locality and should be voluntary rather than mandatory.
Duty to Cooperate Council	• The issues relating to questions D1-2, in so far as they relate to the Strategic Plan area, are unlikely to have any direct impact on Amber Valley.
Duty to Cooperate Council	List of evidence documents suggested.

Duty to Cooperate Parish	 Notes that some local variation may be appropriate depending on the development. Building for Life, Breeam, Living with Beauty, national & local design should be considered codes where they exist.
	• The Plan should also promote aspirational and low carbon objectives e.g. low travel neighbourhoods and self-contained developments (with schools, shops, medical centres and leisure facilities in easy reach) to discourage motor vehicle transport use.
Statutory Consultee	• Recommends that SuDS design principles are promoted. Recommends that design principles outline the Drainage Hierarchy. Recommends that development is designed to incorporate water effect design and technologies.
Statutory Consultee	• Consistent design principles or standards should be used. These should encourage the incorporation of Green and Blue Infrastructure, net gains for nature and access to green spaces. Policies which would encourage development to include green roofs/walls, bird and bat boxes, swift bricks, and access in fences for hedgehogs would be welcome. Green Infrastructure requirements should also be incorporated; a schedule of 'good practice' Green Infrastructure considerations is included, based on Natural England's 'Green Infrastructure Guidance'.
Landowner/Developer/Agent	• Sites should be considered on a site by site basis in terms of design, so guides should not be overly prescriptive.
Landowner/Developer/Agent	 Issues relating to design are considered to be a non-strategic matters, best explored through Part 2 Local Plans. If there are to be standards applied through this Strategic Plan, such as minimum BREAM [Building Research Establishment Environmental Assessment Method] requirements, this must be factored into the supporting Viability Update Study, to ensure no undue impacts on site viability.
Landowner/Developer/Agent	• Good design is fundamental however area specific guidance shouldn't duplicate national

	design guidance. Building for Healthy Life guidance reflects best practice and should remain a voluntary rather than mandatory policy requirement. As per Para 8.5 of the GNSP [Greater Nottingham Strategic Plan] design is varied across Nottinghamshire therefore this plan shouldn't seek to tackle this matter which is arguable best left to each Local Authority who will in most instances already have adopted Supplementary Design Guidance.
Landowner/Developer/Agent	• Regards that local design guides or codes should be a guide and allow sufficient flexibility to encourage appropriate design responses on a site-by-site basis. Any local design guides should avoid being overly prescriptive.
Landowner/Developer/Agent	 Notes that Building for Life offers useful and consistent tools to assess schemes. States that any policy should be drafted flexibly to allow for variation in designs and take account of the increased cost of any requirements. The use of design codes for the large SUEs/new settlements and areas like Conservation Areas, could also be considered.
Landowner/Developer/Agent	 Issues relating to design are considered to be a non-strategic matters, best explored through Part 2 Local Plans. If there are to be standards applied through this Strategic Plan, such as minimum BREAM [Building Research Establishment Environmental Assessment Method] requirements, this must be factored into the supporting Nottingham Core Viability Update Study, to ensure no undue impacts on site viability.
Landowner/Developer/Agent	Regard that masterplans should be prepared for the strategic sites. Specific 'Inset Codes' can be prepared for developments such as schools, shops and commercial uses, and for the Street and circulation networks.
Landowner/Developer/Agent	• Supports measures and guidelines to ensure that places are well designed and are good places to live. Proposed developing both historic and modern designs to reflect the GNA's [Greater Nottingham Area's] history, local architectural, design features and materials, also incorporate bold and more imaginative modern design solutions using the latest materials and technology.
Question D2: Conserving and Enhancing the Historic Environment	

Resident	 Holds that existing buildings should be refurbished rather than demolished. Further notes that a "place history" should be developed and included as (well maintained) information trails within the developments. Funding methods also need to be established.
Other consultee	 The Plan should promote the use of best-practice guidance such as "Listed Buildings and Curtilage – Historic England Advice Note 10" and "The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning Note 3".
Other Consultee	• Notes that more motorised traffic-free areas clear of parked vehicles are needed to allow users on foot and cycles to get the most out of the historic environment (refers to Beeston as being a good example).
Duty to Cooperate Council	• The issues relating to questions D1-2, in so far as they relate to the Strategic Plan area, are unlikely to have any direct impact on Amber Valley.
Duty to Cooperate Parish	 Identify all heritage & non-heritage assets, and through sensitive development (where appropriate) in and around those assets. Including re-use as appropriate and practicable. Conserve assets as necessary and highlight their history and importance to the area and
	community using story boards, displays etc.
Statutory Consultee	 A positive strategy in the terms of NPPF [National Planning Policy Framework] requires a plan for the maintenance and use of heritage assets and for the delivery of development that will make a positive contribution to local character and distinctiveness. Policies for local housing, retail and transport, for example, may need to be tailored to achieve the positive improvements in the historic environment that the NPPF [National Planning Policy Framework] expects. Conservation is certainly not a stand-alone exercise.
Landowner/Developer/Agent	Generally, supports measures to conserve and enhance the historic environment.

Landowner/Developer/Agent	• The value of the historic resource should be identified early in the conception of plans and requirements for its protection and conservation considered alongside, and within, the master planning process.
Landowner/Developer/Agent	• When having regard for the historic environment, a balanced approach must be adopted between protection of heritage assets and ensuring a sustainable pattern of development. Having regard for the Government's latest White Paper, it is considered unnecessary for this Plan to simply repeat protections already afforded to heritage sites through the Framework or by law.
	• With regard to the impacts on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with the more weight the more historically important the asset, irrespective of whether assessed harm would be substantial or less than substantial.
	• In assessing the public benefits of strategic development, the Councils should apply great weight having regard for spatial planning issues contained elsewhere in the Plan. This includes the need to consider climate change, by reducing the need to travel and through better access to services and facilities. Any balance of harm versus benefits must also factor the need to boost significantly the supply of housing, the delivery of the spatial options and boosts to the economy. Would therefore strongly object if less sustainable sites were chosen due to less than substantial harm on more sustainable sites, which benefit from significant public benefits.
Landowner/Developer/Agent	 It is important that the value of the historic resource is identified early in the conception of plans and that requirements for its protection and conservation considered alongside, and within, the master planning process.
Landowner/Developer/Agent	 In assessing the public benefits of strategic development, the Council should apply great weight having regard for spatial planning issues contained elsewhere in the Plan. This includes the need to consider climate change, by reducing the need to travel and through better access to services and facilities. Any balance of harm versus benefits must also

	factor the need to boost significantly the supply of housing, the delivery of the spatial options and boosts to the economy. Would therefore strongly object if less sustainable sites where chosen due to less than substantial harm on more sustainable sites, which benefit from significant public benefits.
Landowner/Developer/Agent	 Notes that the early identification of heritage assets (both designated and non- designated) will be important as the basis of a strategy for the conservation and enjoyment of the historic environment.
	Question IN1: Infrastructure to Support Growth
Resident	• The East Midlands Hub at Toton will create substantially increased traffic flows. The existing infrastructure cannot support this. Junction 25 is already a bottleneck at key times.
	• The healthcare services in Toton & Chilwell are already insufficient with no local availability. Any increased housing will require additional resources properly sited.
Resident	 Requests clarity in paragraph 9.9. Notes that "cycleways" may be implicit in "highways" and regards that the text should be more explicit – e.g. "Transport (highways, primary cycleways, and public transport".
Resident/Specialist Group	Internet connectivity is a major infrastructure issue, demanding careful thought for its impact on economic development
Resident/Specialist Group	 New development plans should extend and improve the bridleway and byway network for the shared enjoyment of equestrians, cyclists and pedestrians. Notes that the pandemic has demonstrated how vital it is to provide shared routes.
Resident/Specialist Group	• Note that no reference in Chapter 9 to cycle and walking infrastructure and regards that

	this should be added. The increasing popularity of e-bikes should also be acknowledged. A significant opportunity for sustainable infrastructure is the DfT [Department for Transport] Transforming Cities Fund (Tranche 2) funded proposals to extend the Eastern Cycle Corridor, as well as potential to improve routes more widely, beyond the city boundary, e.g. to Derby. Councils need to work together on developing improved active travel routes, especially for cyclists.
Resident/Specialist Group	 Poor rail services along the A52 corridor is an obvious barrier. The A52 is already congested at peak times, and further road enhancements would conflict with sustainable development requirements. Enhancing the rail service along the existing river crossing (the 4th Trent crossing) has to be a priority.
Other Consultee	• The Planning White Paper (2020) states that the Government is looking to utilise developer contributions to capture a greater proportion of the land value uplift that occurs through the granting of planning permission. The current estimate is between 25-50%. This should be carried through to the Plan to ensure provision of facilities that will enhance future and existing communities.
Other Consultee	• Regards that Paragraph 9 needs reference to cycle and walking infrastructure adding.
Duty to Cooperate Parish	 All the strategic infrastructure requirements listed in 9.9 need to be considered for all large developments. Infrastructure requirements should be decided by the planning authority in conjunction with the community following a comprehensive needs assessment based on the size of the development and future growth.
Duty to Cooperate Council	 The plan does not include a proposed NET [Nottingham Express Transit] extension along the A610 corridor from the existing Phoenix Park terminus via Kimberley to a new terminus at Giltbrook Retail Park, or the potential for a future extension to Langley Mill and beyond to Heanor and Ripley within Amber Valley. Subject to the outcome of the A610 extension feasibility process, the potential for further housing and economic

	development within the A610 corridor is likely to be boosted. This would enhance accessibility to employment opportunities for Amber Valley residents, and improve the attractiveness of the eastern part of the Borough for businesses.
Statutory Consultee	 BMA [British Medical Association] current guidance suggests around 1800 patients per GP [General Practitioner] so it is incumbent on the NHS [National Health Service] and the local authority to look further ahead to ensure appropriate healthcare provision for the increase in population of future housing developments.
	 Requests that each local authority notifies the CCG [Clinical Commissioning Group] when housing applications are received from developers in order that Section 106 monies can be secured at an early stage to ensure viability of the development in terms of healthcare provision.
Statutory Consultee	 No objections raised and content with the information. Support the aspirations to use HS2 as a catalyst for growth in the locations stated. There are a few considerations where it would be beneficial to highlight future iterations that could be woven into the document. The document does not specifically mention land safeguarded for Phase 2b and what consideration of potential effects upon employment or housing land availability.
Statutory Consultee	 Greater details regarding the potential development needed to enable Severn Trent to assess the impact of development in these locations and to determine what capacity improvements will be required. Severn Trent can support the delivery of infrastructure within the appropriate timeframe once the scale and programme of development is understood. Development must conform to a common Drainage strategy.
Statutory	 Understand that at this stage these figures are provisional and are likely to change to meet the needs of each council, and support the proposal for growth to be transport led, with sites selected based on the ability to deliver sustainable development and be serviced by sustainable transport. With regard to transport infrastructure, it is noted that the consultation documents identify the need for capacity improvements along the A52.

	The Nottingham Junctions improvement scheme is currently being delivered at several A52 junctions, as set out under the A52/A606 Improvement Package Developer Contributions Strategy Memorandum of Understanding. As this scheme does not consider growth in addition to the existing region's Local Plan allocations, the requirement for additional capacity enhancements would need to be investigated should additional growth be allocated in the area. Implications of planned growth on the M1 junctions, particularly M1 J25 & M1 J26, must also be considered to understand the scale of improvements required to ensure that the highway infrastructure continues to effectively serve the region.
Other Consultee	 An Infrastructure Delivery Plan (IDP) should be prepared to support the GNSP [Greater Nottingham Strategic Plan]. A whole Plan viability assessment should be undertaken to ensure that policies setting out Section 106 and/or CIL [Community Infrastructure Levy] contributions do not undermine delivery of the GNSP [Greater Nottingham Strategic Plan].
Landowner/Developer/Agent	• The intention to prepare an Infrastructure Delivery Plan is welcomed.
Landowner/Developer/Agent	 In terms of our own project, we are not aware of insurmountable infrastructure issues that would limit the proposals coming forward.
Landowner/Developer/Agent	 Notes that in recent years it is the south, west and north-west parts of Nottingham which have benefitted the most from infrastructure to support growth.
Landowner/Developer/Agent	 Holds that the GN [Greater Nottingham] Authorities should ensure that a lack of investment in infrastructure does not prevent strategic growth from coming forward over the plan period. Opportunities should be explored through development to help bring forward investment in infrastructure which will enable sustainable growth to occur. For example, the development of new link roads, tram extensions and active travel (cycling and walking) connections will all help to promote sustainable transport. The Strategic Plan should therefore be bold in relation to its ambitions for investment in infrastructure.

It should focus on coordinating infrastructure investment with planned growth in a way that has not happened previously.
 S106 and Community Infrastructure Levy contributions must be set at a viable threshold based on a full plan viability to ensure the deliverability of the Greater Nottingham Spatial Plan isn't compromised. Contributions should be allied to each development requirement. Where broad infrastructure improvements are needed these should be costed and identified with state grant funding actively sort to offset costs.
Question IN2: Priorities for Development-Funded Infrastructure
 Regards that often the Transport Assessments for new developments assume that the local cycleway infrastructure has infinite capacity, and will be able to absorb all the extra cycle-traffic that the development generates.
 Developers should have to pay for cycleway capacity to be provided/increased within (say) 5 miles of their development, to cater for the cycle-traffic generated by the development.
 Regard that sustainable transport should be a priority and a pooled resource. Developers should be expected to pay the same (pro rata) into a general 'pot' rather than only for what immediately relates to their development.
 Active travel infrastructure should be a higher priority for public and private development funding. Authorities and developers need to be closely involved in a coordinated approach to planning and developing these, especially in the case of trunk roads like the A52 where major changes are planned. Cycling provision needs to include safer crossings and paths. Coordinated schemes and linked routes at an early stage are integral. Promoting active travel needs to be strongly encouraged.

Other Consultee	Sustainable and Active Travel routes connecting green corridors as well as safe crossing points on major roads to allow Active Travel should be provided.
	 Active Travel routes should wherever possible be created away from major roads to minimise exposure to air pollution, noise and turbulence caused by speeding or congested traffic.
Duty to Cooperate Parish	 All the strategic infrastructure requirements listed in 9.9 are important. However, those funded by the development should be prioritised as
Landowner/Developer/Agent	• Note that it is important to prioritise infrastructure that helps sites come forward and addresses pressure on existing services and facilities. Contributions towards affordable housing, public art and similar matters should be considered secondary and not required where sites are not able to deliver all required infrastructure. An IDP [Infrastructure Delivery Plan] should be prepared to identify the current provision of the full range of infrastructure against some common standards and allow both areas where there is spare capacity and areas where there are existing gaps or pressure to be identified. A combination of funding sources can be used to provide new services which meet the needs of current and future residents in sustainable locations.
Landowner/Developer/Agent	 The priorities for development funded infrastructure should be set out, so the relationship and dependence between individual sites and infrastructure can be clearly seen.
	Question IN3: Timely Provision of Infrastructure
Resident	 Where improved infrastructure is identified as a key requirement for the long term development, this should be provided before development commences. Borrowing will be needed to fund the creation of the infrastructure and this should be paid by a levy on the development. The annual payment of the levy should be agreed with the developers before development can commence and shall not be varied by the speed with which the development takes place. In this way, the risk lies with the developer and not the

	Council.
Residents/Specialist Group	• Direct, safe, attractive, comfortable and coherent active travel infrastructure being included at an early stage of new developments is very important. This requires affective coordination of all authorities, agencies and developers to avoid fragmented and isolated sections of cycle route.
Residents/Specialist Group	Regards that permission should be made conditional on infrastructure.
Residents/Specialist Group	• The Planning for the Future consultation may reveal practical centralised options and there may be good examples elsewhere.
Duty to Cooperate Parish	By borrowing/raising funds against future developer contributions.
	 Road infrastructure is likely to be needed first, both for construction traffic and initial home/business occupancy. Followed by utilities, flood prevention, green space and public transport. The rest (as listed in 9.9) to follow in due course as required.
Duty to Cooperate Council	• The plan showing potential transport improvements does not include a proposed NET [Nottingham Express Transit] extension along the A610 corridor, or the potential for a future extension into Amber Valley. Subject to the outcome of the feasibility of the A610 corridor, housing and economic development is likely to be boosted by improvements to public transport infrastructure.
Duty to Cooperate Council	 Concurs that it will be necessary for plans in the future to include clearer policies on developer contributions for education facilities. Availability of funding for education provision in relation to new development should be a priority and education solutions should be incorporated into the plan from the outset. Where development is being delivered across multiple sites and is likely to have a cumulative impact on the demand for school places, it is essential that housing developers work collaboratively to ensure that there is a single solution to provision of increased school capacity.

Statutory Consultee	 To enable infrastructure to be provided in a timely manner, clear development locations, plans, and timescales need to be made available.
Other Consultee	 Develop an integrated Active Travel network, using Right of Way designation as a basic level of provision establishing routes on the ground.
	Require developers to provide Active Travel routes and green corridors at the same time as other basic infrastructure goes in.
Landowner/Developer/Agent	• The Infrastructure Delivery Plan can be developed to examine the expected trajectory of development sites to identify when the need for infrastructure arises. This can then be used to prepare a priority list of infrastructure and funding sources. It will obviously be important to assess viability robustly to establish the level of developer contributions that can be achieved.
Landowner/Developer/Agent	• Notes that the GN [Greater Nottingham] Authorities should ensure that a lack of investment in infrastructure does not prevent strategic growth from coming forward over the plan period. Opportunities should be explored through development to help bring forward investment in infrastructure which will enable sustainable growth to occur. For example, the development of new link roads, tram extensions and active travel (cycling and walking) connections will all help to promote sustainable transport. The Strategic Plan should therefore be bold in relation to its ambitions for investment in infrastructure. It should focus on coordinating infrastructure investment with planned growth in a way that has not happened previously, the obvious focus of this should be to build on Nottingham's excellent tram network with extensions coordinated through both housing and economic growth.
Landowner/Developer/Agent	 Schemes that are unable to clearly identify infrastructure provision cannot therefore demonstrate viability and should not be approved, and are unlikely to be allocated. Reliance on public sector resources and approvals should be clearly identified. Government proposals that authorities should be able to borrow against future income

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	from developments should be addressed.
Landowner/Developer/Agent	• Priorities should be linked to where future growth will take place. The local authorities could fund this infrastructure by issuing low interest bearing bonds with varying payback dates (short, medium and long term coupons) to the investment sector giving local authorities time to claw back this funding from development charges (CIL [Community Infrastructure Levy], S106 contributions), public sector land sales and user charges.
	Question OI1: Any Other Issues
Residents/Specialist Group	Objects to the proposed land allocation for development at Stubbingwood Farm.
Residents/Specialist Group	• Questions the relationship between the Development Corporations proposed for the Toton hub and the site of Ratcliffe on Soar power station and the Greater Nottingham Strategic Plan. The new entities should be guided by the Strategic Plan as this plan is drawn up by public authorities accountable to the public.
Residents/Specialist Group	• The Infrastructure Delivery Plan can be developed to examine the expected trajectory of development sites to identify when the need for infrastructure arises. This can then be used to prepare a priority list of infrastructure and funding sources. It will obviously be important to assess viability robustly to establish the level of developer contributions that can be achieved.
Duty to Cooperate Council	• Support Walker Street Eastwood (B02.1) and Regatta Way, West Bridgford (R07.1)
Duty to Cooperate Council	• The Government are currently consulting on Planning Reforms and there are proposals for devolution in the East Midlands, including a Combined Authority. This needs to be

	embraced.
Duty to Cooperate Council	 Congratulates the councils on conducting a consultation that respects the COVID-19 restrictions without having to make any formal amendments to the four SCIs [Statements of Community Involvement] which establish the legally binding arrangements for public consultation activities through the plan-making process.
Statutory Consultee	• Are pleased to see that the Growth Options document indicates that geo-environmental considerations will be assessed as part of the growth options. It is assumed that this will include assessing any risks and/or constraints posed to growth options/development proposals by past coal mining activity.
Statutory Consultee	 Consultee is currently working to produce a local version of flood risk standing advice (LFRSA) which will be applicable across the Greater Nottingham area, so the EA [Environment Agency] will no longer need to be consulted for bespoke comments. Questions whether the LFRSA [Local Flood Risk Standing Advice] be incorporated into the Strategic Plan, or as part of an updated Strategic Flood Risk Assessment (SFRA)?
Landowner/Developer/Agent	 Notes that consideration will need to be given to the expected timetable for preparation of the Strategic Plan alongside the introduction of the changes proposed through the White Paper. These changes will radically alter the format and content of Local Plans.
Landowner/Developer/Agent	 Unclear how estimated supply of houses has been calculated. Should include unimplemented planning permissions, allocations, windfalls and SHLAA [Strategic Housing Land Availability Assessment] sites.