

Report to Cabinet

Subject: Greater Nottingham Strategic Plan Preferred Approach Consultation:
Strategic Distribution and Logistics Sites

Date: 7th September 2023

Author: Planning Policy Manager – Planning Policy

Wards Affected

All

Purpose

To seek approval to issue the Greater Nottingham Strategic Plan Preferred Approach: Strategic Distribution and Logistics Sites document for a period of consultation.

Key Decision

Yes, as it is likely to be significant in terms of its effect on communities living or working in an area comprising two or more wards of the Borough.

Recommendation(s)

THAT:

- 1) That the Greater Nottingham Strategic Plan Preferred Approach: Strategic Distribution and Logistics Sites document and Sustainability Appraisal are approved to allow a period of public representations.**
- 2) That authority is delegated to the Planning Policy Manager to make any minor editing changes such as typographical, formatting or changes to imagery necessary to the Preferred Approach: Strategic Distribution and Logistics Sites document and any supporting evidence documents prior to consultation.**

1 Background

- 1.1 As part of the review of their respective Part 1 Local Plans (Core Strategies) Broxtowe Borough, Gedling Borough, Nottingham City and Rushcliffe Borough

- Councils are preparing the Greater Nottingham Strategic Plan. Consultation forms an essential part of the local plan process. Authorities are legally required under the Town and Country Planning (Local Planning) (England) Regulations 2012 to consult at two stages before submitting draft plans for examinations. Firstly, the initial Regulation 18 stage when the strategy is in its early stages and the later Regulation 19 phase just before it is sent to the Planning Inspectorate for examination.
- 1.2 In January this year the Councils consulted on the Preferred Approach (Regulation 18 consultation), which identified the preferred strategic housing, mixed use and employment sites. The next stages of plan preparation are an additional Regulation 18 consultation on preferred strategic distribution and logistics sites in the Autumn of 2023, followed by a Regulation 19 consultation on the final Publication Draft of the Strategic Plan during 2024.
 - 1.3 As part of the evidence base which informs the Strategic Plan, the Councils commissioned consultants to carry out an Employment Land Study. This study recommended that further consideration should be given to the assessment of the need for major logistics facilities.
 - 1.4 The Councils commissioned a Logistics Study which estimated the level of need for logistics development and identified “Areas of Opportunity” where distribution and logistics development should be located. This focused on proximity to: the strategic highway network; markets that will be served; areas of known under-provision; labour and areas of employment need. Following this study, the Councils undertook a “Call for Sites” during the Autumn of 2022.
 - 1.5 The Councils have now undertaken an assessment of all potential sites and reviewed the supply of sites coming forward from existing and likely commitments, in order to determine the remaining residual need. Details of the site assessments and the methodology are contained within a separate Background Paper. Following the assessments, a Preferred Approach to strategic distribution and logistics has been identified (attached as **Appendix 1**). This includes the proposed allocation of two sites, one in Broxtowe and the other in Rushcliffe.
 - 1.6 Whilst neither site is within this authority’s administrative boundary, the Council must still approve the consultation documents before consultation takes place. This approval is required as although the Preferred Approach has explicitly excluded potential strategic and logistics sites within Gedling Borough, the consultation will inform the Greater Nottingham Strategic Plan and will occur across the whole Strategic Plan area, including Gedling Borough.
 - 1.7 The consultation seeks views on the proposed sites for strategic distribution and logistics.

- 1.8 As required by legislation, the Preferred Approach has also been subject to sustainability appraisal which assessed the potential sites against the Strategic Plan's sustainability appraisal objectives. This appraisal (attached as **Appendix 2**) will also be consulted upon.
- 1.9 Responses to this consultation will be considered as part of preparing the next version of the Strategic Plan which will be the Publication Draft (Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012).

2 Proposal

- 2.1 The Councils across the Nottingham Core and Nottingham Outer Housing Market Area jointly commissioned consultants to carry out an employment land study. The study included a specific recommendation to give further consideration to assess the need for major logistics facilities within the Nottingham Core and Outer Housing Market and wider area.
- 2.2 Ashfield, Broxtowe, Erewash, Gedling, Mansfield, Newark and Sherwood, Nottingham City and Rushcliffe Councils therefore commissioned consultants to undertake a logistics study to assess the specific needs for strategic distribution and logistics facilities across the Nottingham Core and Outer Housing Market Area.
- 2.3 The study was undertaken from a "policy off" perspective, meaning that constraints such as the Green Belt or issues determining sustainability (historic and natural environment constraints and socio-economic factors) were not considered in the ability of the area to accommodate future logistic requirements. The study did not involve modelling capacity of the road network or individual junctions, which will be addressed through future transport modelling work.
- 2.4 In accordance with national planning policy, the study assessed the quantitative need for additional strategic distribution floorspace and also set out more specific locational criteria for locating strategic distribution and logistics. The quantum of space estimated as being required is not viewed as a target but guidance as to the extent of which need may be met once account is taken of policy and environmental constraints.
- 2.5 In summary, the Logistics Study concluded:
- The requirement for planning policy purposes should be 1,486,000 sq. m or 425 ha of logistics space.
 - This would reduce to a residual need of 137–155 ha once commitments (sites with permission), potential pipeline sites (including allocations) and assumed contributions from redeveloped employment sites are taken into consideration.

- Residual need could be delivered on two to three large strategic logistics parks across the study area, which also includes Ashfield, Erewash, Mansfield and Newark and Sherwood Councils.
- 2.6 Further details regarding the Logistics Study, including its relationship with other studies and to distribution and logistics need outside of the Strategic Plan area, are contained within the Background Paper (attached as **Appendix 3**).
- 2.7 Critically the Background Paper has updated the residual need identified within the Logistics Study and, having included the latest supply figures (ensuring there is no double counting of both employment and strategic distribution), this need has been revised to between 131-147 ha.

Locations

- 2.8 The Logistics Study identified broad Areas of Opportunity, within which strategic distribution and logistics should be located. These are based on good connections to the strategic road network; proximity to the markets to be served; locations where there is a known under-provision of strategic sites; and are accessibility to labour and proximity to areas of employment need. It identified areas: around Junctions 25, 26, 27 and 28 of the M1, adjacent to the A453 and at Newark (along the A1 and A46). As set out in the Background Paper and Sustainability Appraisal, a sites location within or close to these areas determined whether they were reasonable alternatives and suitable for further assessment as preferred sites. Within the Background Paper, these more detailed assessments considered environmental, accessibility and other constraints. The sustainability appraisal assessed these sites against 16 sustainability objectives (those used to appraise the housing, mixed use and employment sites).

Preferred sites

- 2.9 Following their assessment, it is proposed that the following sites are allocated for strategic distribution and logistics:

Site Reference	Site Name	Site Area	Estimated Floorspace
BBC-L01	Former Bennerley Coal Disposal Point, Broxtowe	68 ha	74,000 sq. metres
RBC-L01	Ratcliffe on Soar Power Station (part), Rushcliffe	36.4 ha (wider site area is 265 ha gross)	180,000 sq. metres

Combined, these sites will deliver 104 ha of strategic distribution and logistics development, making a significant contribution to meeting assessed needs

within the Logistics Study area.

Meeting the overall need

- 2.10 The Logistics Study recommends providing for approximately 425 ha of strategic warehousing and logistics facilities within the study area which, in addition to Greater Nottingham Strategic Plan area, includes Ashfield, Erewash, Mansfield, Newark and Sherwood Councils. This comprises the northern point of the 'Golden Triangle', an area within the centre of the United Kingdom (including the M1, M6 and M42) from which the logistics sector can reach large parts of the country. The extent of this favored area emphasises the flexibility of strategic distribution and the contributions (although not quantified) that development beyond the study area (most notably along the M1 and A1) will make to the study area's need.
- 2.11 There is a considerable amount of 'committed' and potential 'pipeline' supply already identified by the Councils across the Nottingham Core and Outer HMAs, a significant quantity of which will be delivered within the Greater Nottingham Strategic Plan area. Taking into account this supply, a residual need of between 131 and 147 ha has been identified. The estimate of need is considered to be guidance and not a target as all the Councils must balance meeting demand for strategic distribution and logistics against planning policy and environmental constraints, principally the importance of protecting Green Belt.
- 2.12 The Councils have taken into account the various operational criteria and planning policy constraints and have identified two preferred sites which broadly meet the relevant criteria. This provision, combined with the identified "commitments" and potential "pipeline" supply across the entire study area (including within neighbouring authorities) would provide for a significant growth in the delivery of strategic distribution and logistics facilities in the Study Area and an increased market share of the wider strategic distribution market.

Consultation

- 2.13 It is now intended to undertake an additional informal Regulation 18 consultation stage and seek comments on three documents relating to strategic distribution and logistics, being a matter which was not covered by the previous Preferred Approach consultation. The partner Councils are seeking views on the scope and content of the Preferred Approach: Strategic Distribution and Logistics Sites document (**Appendix 1**).
- 2.14 Sustainability Appraisal is a legal requirement of plan preparation. The Sustainability Appraisal Report - Preferred Approach: Strategic Distribution and Logistics Sites, September 2023 (**Appendix 2**) has been prepared to fulfil the requirements of the Planning and Compulsory Purchase Act (2004), and the requirements of the EU Strategic Environmental Assessment Directive

transposed in the UK by the Environmental Assessment of Plans and Programmes Regulations 2004. The Sustainability Appraisal Report forms part of the Preferred Approach consultation. The Strategic Distribution and Logistics Background Paper (**Appendix 3**) provides a more detailed summary of the evidence of need and the approach taken to the identification of suitable sites.

- 2.15 In terms of next steps, it is proposed that a six week consultation period will be undertaken by the end of the year, with a start date anticipated towards the end of September. Following consideration of consultation responses, a full Pre Submission version of the Strategic Plan will be published in 2024, prior to submission for examination later that year. This timetable may have to flex in response to planning reform, as the Government's approach becomes clearer over the coming months.

3 Alternative Options

- 3.1 One alternative option would be not to review the Aligned Core Strategy but there is a statutory requirement to prepare a Local Plan and to review it every five years. An out of date plan and policies would make the Council vulnerable to speculative planning applications as applications would be determined in accordance with the National Planning Policy Framework and its default presumption in favour of sustainable development
- 3.2 Another alternative would be not to produce an aligned plan but there are significant advantages of a comprehensive approach to strategic planning across the whole of the Greater Nottingham area, ensuring a consistent planning policy approach across the wider area. The Greater Nottingham Housing Market Area Study confirmed that the boundaries remain appropriate to take forward for the review of the strategic policies. Significant cost savings are also achieved in preparing a joint document.
- 3.3 A further alternative would be to not consult on the Preferred Approach: Strategic Distribution and Logistics Sites document. Whilst the Strategic Plan has already been through two periods of Regulation 18 consultation, it has been considered prudent to carry out a further focussed informal consultation on the proposed approach to strategic distribution and logistics sites in order to gain valuable insight and comments from stakeholders which will help to strengthen the Council's position at the submission stage.
- 3.4 In relation to the second recommendation, an alternative option would be not to delegate minor editing changes. However, this would put an unnecessary operational burden on the executive.

4 Financial Implications

- 4.1 The cost of the consultation on the Greater Nottingham Strategic Plan

Preferred Approach document will be met from existing resources. Following on from this, there will be costs associated with subsequent stages of preparation of the Strategic Plan including the examination stage. Funding for this has been set aside in the Local Plan Reserve.

5 Legal Implications

- 5.1 It is a legal requirement of local planning authorities that they exercise their plan making functions (under s.39 (2) of the Planning and Compulsory Purchase Act 2004). There is also a legal requirement to review local plans every five years (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012) and this is reflected in the National Planning Policy Framework (NPPF).
- 5.2 Consultation forms an essential part of the local plan process. Authorities are legally required under the Town and Country Planning (Local Planning) (England) Regulations 2012 to consult at two stages before submitting draft plans for examination. Firstly, the initial Regulation 18 stage when the strategy is in its early stages and the later Regulation 19 phase just before it is sent to the Planning Inspectorate for examination.
- 5.3 A combined database has been set up in conjunction with the other participating authorities and the database and the arrangements for the consultation exercise will be managed in accordance with the requirements of the GDPR.

6 Equalities Implications

- 6.1 The Preferred Approach document is not a full draft plan at this stage and the Equalities Impact Assessment is necessarily broad brush. The Preferred Approach document is subject to consultation with a wide range of stakeholders and the Councils will consult with groups representing people with protected characteristics. The Equalities Impact Assessment will progress in tandem with the emerging Greater Nottingham Strategic Plan as part of an iterative process that will assess more comprehensive and detailed policies and recommend changes at future stages of the Plan's preparation. Further details can be found in **Appendix 4**, Greater Nottingham Strategic Plan Preferred Approach: Equality Impact Assessment for Gedling Borough Council, December 2022.
- 6.2 Consultation will be undertaken in accordance with the Council's Statement of Community Involvement. Appendix 1 of the Statement of Community Involvement sets out stages of preparation of a development plan document and states that the Council will continue to engage with stakeholders and the community through the pre-submission stage using a variety of methods. A key factor is ensuring that the consultation is accessible to all and that equalities implications are given full consideration.

7 Carbon Reduction/Environmental Sustainability Implications

- 7.1 Sustainability Appraisal is a legal requirement of plan preparation in order to consider economic, social and environmental objectives. The Sustainability Appraisal Report has been prepared to fulfil the requirements of the Planning and Compulsory Purchase Act (2004), and the requirements of the EU Strategic Environmental Assessment Directive transposed in the UK by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 7.2 The Preferred Approach document seeks views on the proposed approach to the strategic distribution and logistics sites only. It is not a full draft plan at this stage. However, the next stage of the draft plan will need to, amongst other objectives, address the impacts and challenges of climate change and the mitigation of its effects; and ensure new development contributes to carbon neutrality.

8 Appendices

Appendix 1 Greater Nottingham Strategic Plan Preferred Approach: Strategic Distribution and Logistics Sites, September 2023

Appendix 2 Sustainability Appraisal Report - Preferred Approach: Strategic Distribution and Logistics Sites, September 2023

Appendix 3 Strategic Distribution and Logistics Background Paper

Appendix 4 Greater Nottingham Strategic Plan Preferred Approach: Equality Impact Assessment for Gedling Borough Council, December 2022.

9 Background Papers

Available at

<https://www.gedling.gov.uk/resident/planningandbuildingcontrol/planningpolicy>

:-

- Aligned Core Strategy (September 2014)
- Gedling Borough Council Local Planning Document, July 2018
- Gedling Borough Statement of Community Involvement, September 2019

Other documents which were made available as part of the Preferred Approach consultation which took place in January/February 2023 are available at

- <https://www.gnplan.org.uk/consultations/greater-nottingham-strategic-plan-preferred-approach/> including the Preferred Approach: Employment Background Paper, December 2022
- <https://www.gnplan.org.uk/evidence-base/> including the Nottinghamshire Core and Outer Housing Market Area Logistics Study, August 2022 and the Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study, Lichfields, May 2021

10 Reasons for Recommendations

- 10.1 The production of the Local Plan is a statutory requirement for the Borough Council and must be reviewed every 5 years. The Greater Nottingham Strategic Plan will, when adopted, replace the Aligned Core Strategy and comprise Part 1 of Gedling Borough Council's Local Plan addressing strategic planning issues.
- 10.2 To enable drafting or other minor editing changes to be made without the need to bring the documents back to the Portfolio Holder.

Statutory Officer approval

Approved by:
Date: 15/08/2023
On behalf of the Chief Financial Officer

Approved by:
Date: 17/08/2023
On behalf of the Monitoring Officer