

Representation to the Greater Nottingham Strategic Plan Regulation 19 Consultation – Policy 3

Submitted on behalf of Boots UK by the Planning and Design Group

13 December 2024

Our Ref. 17.118

Boots UK wholeheartedly welcomes the identification of its Beeston campus as a strategic growth location within the Greater Nottingham Strategic Plan (GNSP). The Sustainability Appraisal (SA) Main Report and its appendices provide substantial recognition of the site's exceptional sustainability credentials. This brownfield regeneration site is uniquely positioned in a highly sustainable location in Nottingham, presenting unparalleled opportunities to deliver extensive economic, social, cultural, and environmental benefits for both the city and the wider region.

The evidence provided in the SA Main Report, including Appendices E and G, highlights the potential of the site, although we do not entirely agree with all the negative impacts identified, such as those related to flood risk, pollution, and resource use. We believe these challenges can be effectively mitigated through innovative measures, transforming residual impacts into tangible positives. This includes adopting sustainable construction practices, implementing enhanced flood mitigation measures, and promoting active travel initiatives, all of which align with Policies 8, 12, and 14 of the draft Plan, and are consistent with paragraphs 152-158 of the December 2023 National Planning Policy Framework (NPPF), which emphasise sustainable development and climate resilience.

The Boots campus already benefits from outline planning permission for a mixed-use development. This has been supported by significant investment from both Boots UK and the Government, enabling the delivery of key infrastructure. As a result, a substantial housing community is under construction, including a considerable proportion of affordable homes. However, we believe there is significant untapped potential, and we wish to highlight several opportunities and concerns.

Firstly, in terms of economic regeneration and employment growth, the residential development on the site has progressed successfully, but commercial regeneration has been slower. Boots UK remains fully committed to driving economic growth, particularly in the health, beauty, and wellbeing sectors. Furthermore, the site houses Boots' headquarters and primary logistics operations, which are critical to the company's future plans. There is

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substantial scope for further investment and the expansion of operations in these vital areas, which will contribute significantly to regional economic growth. This aligns with paragraph 81 of the NPPF, which supports sustainable economic development and job creation.

Secondly, approximately 50% of the campus remains underutilised. This land offers a prime opportunity for additional mixed-tenure housing, including affordable homes, which would complement the existing development. Such efforts would address pressing housing needs in Nottingham and Broxtowe, while simultaneously enhancing employment opportunities and community well-being. This aligns directly with the ambitions of Policy 5, which seeks to maximise the potential of sustainable development sites, and reflects paragraphs 60-62 of the NPPF, which stress the importance of delivering a sufficient supply of homes to meet diverse needs.

Thirdly, the campus includes two iconic Grade I listed buildings, D6 and D10, which will become substantially vacant by 2025. These buildings are of immense historical and architectural significance, but their preservation and reuse will require a creative and well-funded approach. This represents a significant opportunity to integrate heritage conservation with sustainable, modern development, showcasing innovative place-making strategies. Policy 11 appropriately emphasises the importance of preserving such heritage assets, and we believe their adaptive reuse can enrich the overall development, creating a vibrant and historically resonant community. This is in line with paragraph 197 of the NPPF, which highlights the need to conserve heritage assets in a manner appropriate to their significance.

We have some concerns regarding the wording around the housing 'target' under Policy 3. The current draft policy could read as limiting the housing allocation at 613 dwellings, which fails to reflect the site's true potential. Under the Aligned Core Strategy (ACS), the site was originally allocated 1,050 dwellings (alongside the Severn Trent land in Broxtowe), of which 604 are fully consented and under construction. The original outline permission was for up to 675 dwellings. The fully consented number would leave a remainder from the previous GNACS allocation of 446 dwellings, yet the current draft Plan refers to a 'remaining' number of 613. This confusion over numbers could potentially inhibit maximising the efficient use of this important brownfield site and undermines the ambition to maximise its contribution to meeting local housing needs. This issue is contrary to paragraph 119 of the NPPF, which calls for effective use of land, especially brownfield sites.

To fully realise the site's potential, we strongly advocate for Policy 3 to be amended to support up to 1,600 additional dwellings, in addition to those already consented. Furthermore, we propose removing references to "remainder" housing numbers for the Boots site, as they impose unnecessary confusion and a lack of clarity. A revised wording for Policy 3 could state: *"Boots (around 1,600 dwellings in addition to those already consented)"*. Additionally, we recommend avoiding the subdivision of housing allocations between

Broxtowe and Nottingham City, deferring this detailed allocation to Part 2 Plans. This approach would provide greater flexibility and allow for a more strategic utilisation of the site's resources.

The Boots campus offers an unparalleled opportunity to create a vibrant, sustainable community that integrates high-quality housing, employment growth, and innovative place-making. It has the potential to become a flagship development, leveraging sustainable technologies, active travel initiatives, and renewable energy solutions. By revising Policy 3, the GNSP can reflect the level of ambition required to unlock the full potential of this significant brownfield site. This will ensure the Boots campus makes a maximum contribution to Nottingham's housing and economic aspirations, while also preserving its historical legacy and cultural significance. These aims align with paragraph 92 of the NPPF, which promotes the development of healthy, inclusive, and safe places.

We urge the Greater Nottingham Planning Partnership to consider these points carefully and make the necessary amendments to the policy. Doing so will not only address current housing needs but also create a sustainable, forward-thinking community that sets a benchmark for future developments across the region.

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Boots UK supports the overarching intent and flexibility within Policy 19, which reflects the significant strategic importance of the Beeston campus. We commend the policy's adaptability to accommodate both higher housing and employment growth. However, we believe that greater specificity regarding the site's potential is necessary to provide increased confidence, aspiration, and clarity for future development.

The Beeston campus is a unique brownfield regeneration site that has already demonstrated its potential as a mixed-use development hub. It spans approximately 126 hectares, with 80.9 hectares in Nottingham City and 44.8 hectares in Broxtowe. The site is a critical asset for regional growth, capable of accommodating significant housing, employment, and community uses while preserving and enhancing its historical and architectural assets.

To strengthen Policy 19, we propose amendments that explicitly highlight the campus's capability to support additional growth, aligning with sustainable development principles outlined in the December 2023 NPPF, particularly paragraphs 119 (making effective use of land) and 152-154 (supporting the transition to a low-carbon economy).

Proposed Amendments to Policy 16 Wording:

1. The area, as shown on the adopted policies map, comprises approximately 126 hectares (80.9 hectares in Nottingham City and 44.8 hectares in Broxtowe). It is identified as a strategic site for up to 200,000 square metres of employment floorspace and up to 2,000 residential units.

2. This would include:

A. Housing

1. Provision of diverse housing options, including affordable housing, for families, young professionals, and older adults. A greater emphasis on increasing housing density, as appropriate, will optimise land use and address local housing needs. Flexibility for up to

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2,000 housing units will allow the site to respond to evolving housing demands in Nottingham and Broxtowe.

B. Commercial and Employment Uses

2. Provision of

- Office units (E(g)(i))
- Research and development facilities (E(g)(ii))
- Light industrial (E(g)(iii))
- General industrial (B2)
- Storage and distribution centres (B8)
- Residential units (C3)
- Residential institutions (C2)
- Learning and non-residential institutions (F.1)
- Leisure (E(d))
- Retail (E(a)), Services (E(c)), Food and drink (E(b)): Up to 2,500 square metres of floorspace, with no single unit to exceed 1,800 square metres.

3. Provision of new business and commercial space with a focus on the hi-tech sector and health and beauty

C. Blue and Green Infrastructure

4. Retention and creation of areas of semi-natural habitat adjacent to the Beeston Canal with improved linkages to the canal.
5. Qualitative improvements to on-site open space provision and enhancements to existing open space / green infrastructure.
6. Enhanced links to existing blue and green infrastructure within the vicinity of the site.

D. Transport

7. Submission of a transport assessment and improved linkages (bus, cycle and pedestrian) to the surrounding area including Beeston and the City Centre and other active travel measures.

E. Other Requirements

8. Submission of an acceptable site investigation and remediation scheme suitable for mixed use proposals.
9. Suitable proposals for sustainable urban drainage and flood risk mitigation measures.
10. Proposals which safeguard air quality and groundwater resources.
11. Proposals which maximise opportunities for the use and generation of low carbon energy.
12. Design and layout that complements and does not detract from the existing campus style of development.

13. Proposals which preserve or enhance the significance of heritage assets on site. Commitment to the adaptive reuse of Grade I listed buildings (D6 and D10) and the Grade II* listed fire station. These assets represent significant architectural and cultural heritage that can be integrated into the broader development strategy.

14. Planning permission will not be granted for manufacturing uses which would have an adverse air quality impact upon any European site for nature conservation including the possible potential Special Protection Area, either alone or in combination with other pollution sources such as traffic.

15. Appropriate provision for local services, including health, education, and retail, to support a self-sufficient and cohesive community.

Rationale for Amendments

These amendments ensure the policy more explicitly reflects the site's potential as a driver of sustainable development. By allowing flexibility for additional housing and employment opportunities, the policy would provide greater certainty to developers and stakeholders, supporting the efficient delivery of strategic priorities. Moreover, by referencing specific sectors, such as health-tech and sustainable technologies, the policy reinforces the campus's role as a catalyst for regional economic growth.

Conclusion

Boots UK urges the Greater Nottingham Planning Partnership to refine Policy 19, explicitly acknowledging the site's potential to accommodate greater housing and employment growth. Such amendments will not only align with the NPPF but also ensure the policy reflects the ambition and transformative potential of this strategic site. These changes will inspire confidence in the site's future, driving investment and delivering sustainable, high-quality development that meets the region's long-term needs.