

## **Report to Portfolio Holder for Growth and Regeneration**

**Subject:** Erewash Borough Council Growth Options

**Date:** 28<sup>th</sup> May 2020

**Author:** Service Manager Planning Policy

### **Wards Affected**

All

### **Purpose**

To approve the Council's response to the Erewash Borough Council Growth Options Consultation

### **Key Decision**

No

### **Recommendation(s)**

#### **THAT:**

- 1) The Portfolio Holder approves the attached response to the Erewash Borough Council Consultation on its Growth Options document.**

## **1 Background**

- 1.1 Erewash Borough Council has published a Growth Options consultation document as the first stage of replacing its Core Strategy. Erewash Borough Council is a member of the Joint Advisory Planning Board (JPAB), which has agreed to review the Aligned Core Strategies covering the Greater Nottingham Area. The new core strategy is called the Greater Nottingham Strategic Plan. It was anticipated that the Greater Nottingham Councils would consult on a single 'issues and options' document as the first formal stage of preparing the Greater Nottingham Strategic Plan. However, Erewash Borough Council Growth Options Document states that due to the development pressures the

Council faces, and the need to progress swiftly with plan making, Erewash Borough Council has produced a separate 'Growth Options' document and Sustainability Appraisal as the first stage of its Core Strategy review. The document is available here:

<https://www.erewash.gov.uk/index.php/local-development-framework/2020-core-strategy-review.html>

- 1.2 The Growth Options document clarifies that Erewash Borough Council's emerging Plan is intended to cover the period until 2037 (the Greater Nottingham Strategic Plan will cover up to 2038). The approach by Erewash to produce its own Growth Options document gives rise to a number of strategic planning concerns, which are summarised below and set out in more detailed in the attached response.
- 1.3 A draft Duty to Cooperate Statement was agreed by JPAB and submitted to government for feedback in late 2018, which is still awaited. This document set out a number of agreements and commitments as follows:
  - The Joint Planning Advisory Board agrees that the minimum housing need for Greater Nottingham will be the total of the minimum number of homes for each Council as generated by the standard methodology.
  - The Joint Planning Advisory Board will consider whether there are any exceptional circumstances that justify a different minimum housing figure being included in strategic policies.
  - The Joint Planning Advisory Board will recommend the distribution of the housing requirement between the constituent Council areas.

## **2 Proposal**

- 2.1 It is proposed that the Portfolio Holder approves the attached appendix setting out the representations of Gedling Borough Council to the consultation.
- 2.2 The representations are intended to be positive and helpful in order to help facilitate a joint approach to the strategic planning of the area preferably through the preparation of a single aligned core strategy
- 2.3 Turning to the draft response attached as **Appendix 1** there are a number of concerns set out. Firstly, Erewash Borough Council did not enter into any formal discussions with the other Council partners about the preparation of their Growth Option document or the consultation for it, which is not in the spirit of the duty to cooperate. Consequently, the

opportunity to continue the effective joint strategic planning of our areas is missed.

- 2.4 Secondly, in setting out a single preferred option to meet the housing needs of Erewash Borough based on the government's standard method potentially prevents a consistent and coherent strategic planning approach across the whole area risking potential delays and costs. These risks are amplified because the Erewash approach is premature in that Government is currently reviewing the standard method with a view to possibly increasing the housing targets. It also ignores the possibility of an agreed "uplift" of the housing targets to accommodate the growth implications of the HS2 hub station being developed at Toton close to the Erewash Borough boundary.
- 2.5 Thirdly, it is argued that Erewash Borough Council should build more flexibility into their emerging strategy for accommodating additional growth, should the need arise, which is in line with guidance set out in the National Planning Policy Framework. There is a risk that without added flexibility over both the amount and distribution of development, then the possibility of re-aligning the Erewash Borough Council Core Strategy review with that of the other partner Councils in the near future is likely to be jeopardised. In this context, a specific concern is that the plan period indicated in the Erewash Borough Growth Options document extends to 2037, which is inconsistent with the other Greater Nottingham Councils who are planning up to 2038.
- 2.6 Question 11 in the Erewash Growth Options document seeks responses from neighbouring authorities on whether sites in those authorities are available that could meet Erewash housing needs more sustainably. In response, Gedling Borough Council would state that the mechanism for dealing with such cross boundary issues is through the Joint Planning Advisory Group. In addition to the concerns summarised above, the attached draft response sets out a number of points indicating how Erewash Borough Council could address the concerns of Gedling Borough Council. These points are intended to be helpful and to encourage constructive discussions and seek to realign plan making. In this context, it is positive to note that all the partners Councils including Erewash Council are continuing to prepare a single joint evidence base covering the whole of Greater Nottingham.

### **3 Alternative Options**

- 3.1 An alternative option would be for Gedling Borough Council not to respond to the consultation in which case the views of this Council would not be made known.

- 3.2 A further alternative would be to make different representations, however, the attached representations are considered consistent with the National Planning Policy Framework, the Government's Planning Practice Guidance and the Draft Duty to Cooperate Statement referred to above.

#### **4 Financial Implications**

- 4.1 None

#### **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). It is also a legal requirement for local planning authorities to meet the Duty to Cooperate requirements set out in statute.

#### **6 Equalities Implications**

- 6.1 None. Gedling Borough is responding as a consultee.

#### **7 Carbon Reduction/Environmental Sustainability Implications**

- 7.1 None. Gedling Borough is responding as a consultee.

#### **8 Appendices**

- 8.1 Appendix 1: Draft response to Erewash Borough Council.

#### **9 Background Papers**

- 9.1 Erewash Borough Council Core Strategy Review 2020: The Local Plan Consultation on Growth Options

#### **10 Reasons for Recommendations**

- 10.1 To respond to the consultation on Erewash Borough Council's Growth Options Consultation by the deadline set.

#### **Statutory Officer approval**

**Approved by:** Assistant Director Finance  
**Date:** 4/6/2020  
**On behalf of the Chief Financial Officer**

**Approved by:** Service Manager Legal

**Date:** 8/6/2020  
**On behalf of the Monitoring Officer**