

Appendix 1

GBC comments on EBC options

These representations raise concerns about the approach Erewash Borough is taking towards preparing a new strategic plan, these comments are intended to be constructive in nature and to assist future policy preparation for the Council. In particular, we would wish this response to facilitate the continued and close cooperation and joint working between all of the Greater Nottingham Councils, which has been such a feature of our efforts to join up strategic planning in the past.

Background

The draft Statement of Common Ground (SOCG) outlines the key cross boundary strategic planning issues facing the Greater Nottingham Housing Market Areas and whilst draft, sets out a commitment by the partner Councils about how such matters are to be addressed. In respect of housing targets and their distribution, the draft SOCG commits the partner Councils to the following:

- 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.

It was anticipated by the draft SOCG that the Greater Nottingham Councils would consult on a single 'Options for Growth' document as the first formal stage of preparing a Greater Nottingham Strategic Plan. This stage is to be informed by a consultant's study into growth options, due to report in April (AECOM Greater Nottingham Options for Growth Study).

It is noted that Erewash Borough Council do not currently have a five year housing land supply. It is understood that further under-delivery against the Housing Delivery Test may mean the triggering of the presumption in favour of development as set out in paragraph 11 of the National Planning Policy Framework. In this context, the other Greater Nottingham Councils have agreed to progress the Greater Nottingham Strategic Plan as fast as possible, to which aim Gedling Borough Council is able and willing to play its part. Gedling Borough

Council agrees with the other partner Councils that a consistent strategic planning approach is the best means of achieving sustainable patterns of development and improved delivery. The timetable allows for the thorough consideration of alternative options for growth based on independent advice and for flexibility to address any increase in local housing need brought about by a change to the standard methodology.

Issues and concerns

1. Gedling Borough Council is therefore concerned that Erewash Borough Council are consulting on a separate “Options for Growth” document covering their Borough only. There has been no formal discussion with other Greater Nottingham Councils in preparing or undertaking this consultation which is not in the spirit of the duty to co-operate or the draft Statement of Common Ground. As such, the opportunity to continue the effective joint strategic planning of our areas is missed.
2. The Options for Growth consultation sets out a single preferred option for meeting the objectively assessed local housing need for Erewash Borough based on the Government’s existing standard methodology. A major concern is that this approach pre-empts and potentially prevents a consistent strategic planning approach to achieving sustainable patterns of development including for both housing and employment across the housing market area. Setting out a preferred strategy for growth without the engagement of the other local planning authorities in the Housing Market Area significantly increases the risk of delays and costs to our collective strategic planning processes.
3. This risk is amplified as there are a handful of critical matters that are currently not fully known that will have a bearing on HMA wide housing requirements. These include a decision on the government’s final position on the standard method of calculating housing need, viability issues, what if any uplift is appropriate in relation to HS2 once a decision is reached by government on this, and infrastructure issues across the HMA. In this context, there may be a strategic planning need to increase the amount of housing in Erewash Borough Council in order to respond to an uplift in housing numbers in general arising from the Government’s review of the standard method; or to promote additional growth arising from the opportunities provided by investment in HS2.

4. Given the uncertainties about the overall scale of development to be planned for over the plan period, Gedling Borough Council would argue that Erewash Borough Council should build in some flexibility to their emerging strategy following the consultation on their Preferred Options in order to accommodate additional need should it arise. This is a requirement of the National Planning Policy Framework in relation to plan preparation as set out in paragraph 11 a.
5. 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 Draft Options document extends to 2037 which is inconsistent with the other Greater Nottingham Councils who are planning up to 2038.

The Erewash Borough Draft Options document – consultation questions

The questions set out on page 11 of the document are noted and more specifically our attention is drawn to the specific intention by Erewash Borough Council to enquire of the neighbouring Councils the following question:

“As part of this consultation the Council will enquire if any neighbouring local planning authorities can provide alternative sites that are more sustainable than the Green Belt options considered above”.

Gedling Borough Council’s view is to reiterate that the mechanism for dealing with this matter should rest with the Joint Planning Advisory Board and the commitment set out in the draft SOCG (reference 3.1 on page 6 reproduced in part in the bullet points following paragraph 2 of this letter above). This commitment was agreed by all Greater Nottingham Councils and Derbyshire County Council.

Resolution of issues and concerns

Gedling Borough Council strongly believes that it is by continuing our joint working arrangements that these issues can be effectively addressed in line with all of our Councils’ shared and longstanding commitment to the benefits of joint working on strategic planning through our Joint Planning Advisory Board.

Publishing a preferred strategy in this way risks undermining the progress made in recent years to align our planning processes.

It is recognised that Erewash Borough Council are continuing to participate in the joint preparation of evidence and this is very much welcomed. However, Gedling Borough Council would ask Erewash Borough Council to consider the following potential remedies and benefits for the satisfactory continuance of joint working in accordance with the draft SOCG prepared pursuant to the legal requirement to carry out the duty to cooperate, as follows:-

- An approach to address any uplift in housing need, whatever the justification for this (for example, a new Government methodology for assessing local housing need).
- Meeting the Duty to Cooperate through the presentation of a single coherent and aligned strategy. There is a significant risk to Erewash Borough Council and the other Greater Nottingham Councils if this is not carried out.
- Flexibility on behalf of Erewash Borough Council (along with the other partners) to show all reasonable alternative strategies had been considered for Greater Nottingham as a whole.
- There could potentially be a single examination, which would result in cost savings for all partners.
- A defensible approach to the housing need apportioned to each Council, through the presentation of a single coherent strategy for Greater Nottingham as a whole.

As stated at the beginning of this letter, the concerns outlined above are intended to be constructive and facilitate positive discussions to address the concerns raised; and to this end I would be willing to discuss the above issues further at your convenience.