

Report to Cabinet

Subject: Greater Nottingham Strategic Plan Growth Options Consultation

Date: 2 July 2020

Author: Service Manager – Planning Policy

Wards Affected

All

Purpose

To seek approval to issue the Greater Nottingham Strategic Plan Growth Options 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 Growth Options document is approved in so far as it relates to Gedling, to allow a period of public representations.**
- 2) That authority is delegated to the Service Manager Planning Policy to make any minor editing changes such as typographical, formatting or changes to imagery necessary to the Growth Options document prior to consultation.**

1 Background

- 1.1 This report follows on from the Cabinet Report dated 10th January 2019 at which members were asked to note the intention to commence a review of the Local Plan, commencing with the review of the Core Strategy.

- 1.2 Strategic policies for the Greater Nottingham area are currently set out in the adopted Core Strategies for the Greater Nottingham authorities (Broxtowe Borough, Gedling Borough and Nottingham City Councils, adopted in September 2014; the adopted Core Strategy for Erewash Borough Council, adopted in March 2014; and the adopted Core Strategy for Rushcliffe Borough Council, adopted in December 2014). Collectively these are referred to as the Aligned Core Strategies, as the policy framework within them is consistent, they are based on a common evidence base, collectively they meet the full objectively assessed need for housing and other development, and they cover the same plan period. Together they provide a consistent and coherent strategic spatial planning framework for the Nottingham Core (Greater Nottingham) Housing Market Area.
- 1.3 The Aligned Core Strategy was adopted in September 2014 and forms part 1 of the Gedling Local Plan, providing the strategic context for the Part 2 Local Planning Document. It sets out the strategic policy direction for future development in the Borough up to 2028. There is, however, a legal requirement to review local plans every five years. Once adopted, the Greater Nottingham Strategic Plan will replace the Aligned Core Strategy and the publishing of the Greater Nottingham Strategic Plan Growth Options represents the first stage in reviewing the core strategies covering Greater Nottingham.
- 1.4 An important first stage is the preparation of evidence. One early commission¹ was to review whether the geographic area remained the appropriate area to plan for and the study provided the assurance that the preparation of the review is based on sound geography. The Greater Nottingham Strategic Plan Growth Options is being prepared by Broxtowe Borough Council, Gedling Borough Council, Nottingham City Council and Rushcliffe Borough Council.
- 1.5 In terms of the other partner authorities within the Greater Nottingham area, Erewash have produced a separate Growth Options document and Sustainability Appraisal as the first stage of their Core Strategy review. The Hucknall part of Ashfield District Council is also part of Greater Nottingham but most of the district lies outside of Greater Nottingham and the District as a whole is part of the Nottingham Outer Housing Market Area. In accordance with the conclusions of the Greater Nottingham Housing Market Area Study the strategic policies will be set out in its own emerging Local Plan.

¹ Nottingham Core Housing Market Area Boundary Study 2018, Opinion Research Services

2 Proposal

2.1 The Greater Nottingham Strategic Plan Growth Options document will set out the key principles for the vision for development across the Greater Nottingham area over the next 15 – 20 years, building on the strengths of the existing strategy, promoting sustainable development patterns and addressing climate change. The National Planning Policy Framework (2019) also states that Local Plan strategic policies should look ahead over a minimum 15 year period from adoption, so the plan period for the Greater Nottingham Strategic Plan will extend to 2038 with a base date of 2018.

2.2 The National Planning Policy Framework includes a list of the minimum requirements for a strategic plan which has been considered for this document and includes the following chapters and key questions:

Overall Strategy. Distribution options for future growth are questioned; considers urban intensification/concentration; focus on key settlements with or capable of providing infrastructure; new settlement option; Green Infrastructure-led growth option and a focus on accessible locations. Consideration is also given to the housing need options such as what factors could justify departing from the standard methodology such as major new infrastructure, meeting affordable housing need and environmental constraints.

Green and Blue Infrastructure and the Natural Environment. How new growth is supported and provides new Green and Blue Infrastructure is questioned;

Green Belt. The principle of maintaining the Green Belt is considered and what factors would need to be taken into account with a Green Belt review;

Working in Greater Nottingham. The quantum of employment development to support our economic aspirations is questioned and also how we can support the recovery and growth of the economy especially in view of the current Covid-19 crisis;

Living in Greater Nottingham; The types of homes and the proportion and nature of affordable housing is considered;

City and Town Centres; How the Strategic Plan can help our City and Town centres adapt and change is considered;

Designing Good Places; The need to ensure the Strategic Plan results in places where people want to live and work is questioned; and

Infrastructure to Support Growth. What infrastructure will be needed to

support new growth is raised.

- 2.3 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.
- 2.4 This Growth Options document (**Appendix 1**) comprises the first formal Regulation 18 stage and the partner councils are seeking views on the scope and content of the Strategic Plan. The Growth Options document looks to identify the key issues facing the plan area and the main options open to us for tackling those issues. The consultation asks whether the issues are the right ones, whether any have been missed, which of the options consultees favour or whether any other options should be considered in taking the strategy forward.
- 2.5 The Growth Options document makes no decisions regarding how future growth should be accommodated. To inform future decisions, the councils have commissioned consultants AECOM to review options for growth in Greater Nottingham to inform the preparation of the Greater Nottingham Strategic Plan. The Growth Options Study assesses the growth potential of broad locations and this information will help decide where and what form development should take in order to meet the collective growth targets of the councils in a way that best meets a range of environmental, economic, social, transport and other objectives. The Growth Options Study does not identify land for a specific number of homes, but identifies all locations that could be appropriate for strategic scale growth to help the Councils make decisions about specific areas once housing need is known. Work will need to be undertaken to understand the amount of need that can be accommodated within the urban area. However, it is important to note that the area of land identified as having potential for development is likely to be several times more than is needed to accommodate future housing need in Gedling Borough. Therefore, choices over where the growth should go can be informed by this report and other technical evidence base documents as part of the plan preparation process. A briefing note summarising the conclusions of the Growth Options study is attached as **Appendix 2**.
- 2.6 The Growth Options consultation asks consultees to comment on three elements of the Growth Options Study:-
 - the growth strategy options;
 - the 48 broad areas of search across the plan area (of which 10 are

in Gedling); and

- the sites put forward by developers, either through the annual SHLAA process or as part of a 'call for sites' undertaken in 2019, that have been considered as part of the Growth Options study.

- 2.7 This statutory stage must have regard to the representations received and these will help to inform the developing strategy. Key matters such as the growth assumptions including the quantum and distribution will be agreed at the next stage of the plan. The Sustainability Appraisal is a legal requirement of plan preparation. The Sustainability Appraisal Scoping Report (**Appendix 3**) 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.
- 2.8 The Council also has a requirement to set out how we will effectively engage with communities during plan preparation in the Statement of Community Involvement. When assessing the plan's legal compliance, the examining inspector will consider whether it has been consulted on in line with the Statement of Community Involvement's objectives.
- 2.9 However, many typical forms of local plan consultation are now either impossible or very difficult since restrictions on travel and social distancing were imposed by government in the wake of the coronavirus pandemic. Some typical Statement of Community Involvement commitments such as providing hard copies of documents in public locations or holding face-to-face community consultation events are no longer possible. The Council's Statement of Community Involvement states that a consultation strategy will be produced for each development plan document prepared, to set out the specific approach to consultation for that document. The consultation strategy for the Greater Nottingham Strategic Plan responds to the current restrictions on travel and social distancing but ensures that the measures proposed still accord with the Statement of Community Involvement.
- 2.10 Nevertheless, there is a call on local planning authorities to press on with their plan preparation during the pandemic and consider this an opportunity to think differently about how to consult and allow people to get involved. Many of the events which would have happened physically can take place online and there is an opportunity to make better use of social media. The proposed interim measures will be made clear on the Council's website and it is intended that the Growth Options document will be available for representations over an extended 10 week period (rather than 6 weeks) commencing on 6th July and ending on 14th September 2020.
- 2.11 Once the consultation period has concluded we will assess the responses, collate the remaining evidence before preparing a draft strategic plan "Preferred Option" for public consultation. Responses to that document will

be reviewed before the drafting and publishing the draft Strategic Plan and submission to the Planning Inspectorate for examination.

2.12 The timing of the next stages of plan preparation is uncertain, given the current circumstances and likely implications for the preparation of evidence. However, the latest timetable agreed by the Joint Planning Advisory Board (JPAB) is as follows:-

- January 2021 – consultation on draft strategic plan (preferred options stage)
- June 2021 – consultation on strategic plan (publication stage)
- November 2021 – submission of strategic plan to Secretary of State

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 7 and its default presumption in favour of sustainable development

3.2 Another alternative would be not to produce a joint plan but there are significant advantages of a comprehensive approach to strategic planning across the whole of the Greater Nottingham area. The Greater Nottingham Housing Market Area Study confirmed that the boundaries remain appropriate to take forward for the review of the strategic policies.

3.3 One further alternative would be to delay consulting on the Growth Options document until the guidelines on social distancing are relaxed but the current guidance is encouraging local planning authorities to press on with plan preparation process and to be well placed to progress the plan once social restrictions have been removed.

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 preparation and consultation of the Local Planning Document is part of the statutory planning process. The costs of this activity will be met from existing resources identified for this purpose.

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 5 years (Reg 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012) and this is reflected in the revised National Planning Policy Framework (NPPF).

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. The Growth Options stage comprises the initial Regulation 18 stage

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 Growth Options document looks to identify the key issues facing the plan area and the main options open to us for tackling those issues. It is not a draft plan at this stage. However, the next stage of plan preparation will need to be supported by an Equalities Impact Assessment in order to consider any equalities implications arising from the draft policies.
- 6.2 Consultation on the Growth Options document will be undertaken in accordance with the Council's Statement of Community Involvement. A separate consultation strategy is being prepared to set out in more detail how the Council will carry out consultation in partnership with other Greater Nottingham councils on the Greater Nottingham Strategic Plan in the light of the current Government guidance on social distancing due to the public health crisis. 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 Scoping 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.

- 7.2 The Growth Options document looks to identify the key issues facing the plan area and the main options open to us for tackling those issues. It is not a draft plan at this stage. However, the document states that the draft plan will need to, amongst other objectives, address the causes 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 Growth Options document

Appendix 2 - Growth Options Study: briefing note

Appendix 3 - Greater Nottingham Strategic Plan Sustainability Scoping Report

9 Background Papers

Background Paper 1 - Aligned Core Strategy (September 2014)

<https://www.gedling.gov.uk/acs/>

Background Paper 2 - Nottingham Core Housing Market Area Boundary Study, 2018 - <http://www.gnplan.org.uk/evidence-base/>

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 the 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:	Alison Ball
Date:	10 th June 2020
On behalf of the Chief Financial Officer	
Approved by:	Francesca Whyley
Date:	10 th June 2020
On behalf of the Monitoring Officer	