

## **Report to Cabinet**

**Subject:** Greater Nottingham Strategic Plan Preferred Approach Consultation

**Date:** 8 December 2022

**Author:** Planning Policy Manager – Planning Policy

### **Wards Affected**

All

### **Purpose**

To seek approval to issue the Greater Nottingham Strategic Plan Preferred Approach 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 document and Sustainability Appraisal is approved in so far as it relates to Gedling Borough, 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 document and any supporting evidence documents prior to consultation.**

## **1 Background**

- 1.1 This report follows on from the Cabinet Report dated 10<sup>th</sup> 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. A subsequent report dated 2<sup>nd</sup> July 2020 sought approval to consult on the Growth Options

document.

- 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 consultation on the Greater Nottingham Strategic Plan Preferred Approach document and Sustainability Appraisal and the associated evidence base will contribute to the progressing the review of the core strategies covering Greater Nottingham.
- 1.4 The Greater Nottingham Strategic Plan Preferred Approach is being prepared by Broxtowe Borough Council, Gedling Borough Council, Nottingham City Council and Rushcliffe Borough Council. It does not include the full range of topics that will form the Strategic Plan but focusses on the proposed vision and strategy alongside the housing and employment provision.
- 1.5 In July 2020 and February 2021, Broxtowe Borough, Gedling Borough, Nottingham City and Rushcliffe Borough Councils consulted on the Greater Nottingham Strategic Plan Growth Options document. This was a Regulation 18 consultation which requires that various bodies and stakeholders be notified that the Councils are preparing a plan and invites them to comment about what that plan ought to contain.
- 1.6 A Report of Consultation Responses was published in February 2022 which summarised the consultation responses received. The Councils' response to the consultation comments for matters relating to this Preferred Approach consultation is included in the Background Paper titled Preferred Approach: Response to the Growth Options Consultation, December 2022. For matters not relating to this consultation, responses will be provided as part of the next stage (Publication Draft) of the Strategic Plan.

1.7 The Councils have been updating the evidence to support the preparation of the Strategic Plan. The main documents forming the evidence base are set out below at para 1.8. All documentation associated with the consultation will be available at <https://www.gnplan.org.uk/>.

1.8 The following documents have been prepared to support the proposed consultation:

#### Housing

- Preferred Approach: Site Selection Report, December 2022
- Preferred Approach: Assessment of Housing Need and Capacity in Nottingham City, December 2022
- Preferred Approach: Housing Background Paper, December 2022

#### Employment

- Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study, Lichfields, May 2021
- Nottinghamshire Core and Outer Housing Market Area Logistics Study, July 2022
- Preferred Approach: Employment Background Paper, December 2022

#### Green Belt

- Preferred Approach: Green Belt Review, December 2022
- Preferred Approach: Green Belt Background Paper, December 2022

#### Infrastructure

- Preferred Approach: Infrastructure Delivery Plan Baseline Assessment, December 2022

#### Heritage

- Preferred Approach: Heritage Assets Assessment, December 2022

#### Natural environment

- Preferred Approach: Habitats Regulations Assessment Review Paper, December 2022

#### Previous consultation responses

- Report of Consultation Responses: Growth Options, February 2022
- Preferred Approach: Response to the Growth Options Consultation, December 2022

## **2 Proposal**

2.1 The Preferred Approach contains a **Vision** setting out the intended character of the plan area, describing what the plan area will look like in 2038. This Vision includes key strategic issues such as climate change, enhancing Blue and Green Infrastructure, improving access to homes and jobs and the distribution of development. It is based on current and future trends of key aspects such as population and economy. **Objectives** flow from the vision, establishing the way in which the plan area will deal with the identified key issues. Only objectives relating to housing and employment are included as

part of this consultation. Objectives covering all aspects will be included as part of the next iteration of the Strategic Plan.

2.2 The proposed **Planning Strategy**, follows on from the Vision and Objectives and confirms the focus on urban living through prioritising sites within the main built up area, and to a lesser extent adjoining it, seeking to achieve sustainable growth by making the most of existing infrastructure and reducing the need to travel. This approach utilises the range of facilities and services which are provided within the City and town centres and will provide opportunities to redevelop brownfield sites and drive regeneration of parts of the urban area.

2.3 The settlement hierarchy set out in the proposed Planning Strategy consists of:-

- the main built up area of Nottingham:
- adjacent to the Sub Regional Centre of Hucknall; and
- the Key Settlements.

The settlement hierarchy reflects the role and size of urban areas and sets the preferred sequence for site development. Nottingham and its built up area is of national and regional importance in terms of its size and economy. The Sub Regional centre of Hucknall (in Ashfield District) is relatively large and has its own distinct identity and economic role. The Key Settlements have been locally defined, based on their role, function and planning policy considerations. Outside of the Key Settlements, development at other settlements will be of a smaller scale, which will be defined in the Part 2 Local Plan.

2.4 In terms of the approach to **housing** need, the National Planning Policy Framework (NPPF) confirms that the standard method for assessing local housing need should be the starting point for determining the minimum number of homes required, unless exceptional circumstances justify an alternative approach. A buffer should also be applied to the housing need figure to allow for flexibility and ensure that housing need is met. Nottingham City is one of the 20 largest urban local authorities in the country, accordingly the standard method applies a 35% uplift to its housing need.

2.5 Nottingham City does not have the capacity to meet the entirety of its need once the 35% uplift has been added, and so the Preferred Approach housing target is based on the anticipated housing land supply over the plan period. Due to Green Belt constraints, the Borough Councils have not agreed to provide for any of Nottingham City's unmet need, so housing targets for the Borough Councils are based on the standard method housing need. A housing target of 7,950 (plus 10% flexibility buffer) will be provided for Gedling.

2.6 Most of the planned housing growth is already included in existing Local Plans. However, for clarity, the Preferred Approach document includes

reference to strategic sites 'carried forward' from the Aligned Core Strategy which have planning permission but where works have either yet to start or where a significant amount of development is still to take place.

- 2.7 In line with sustainability principles and the settlement hierarchy, as much housing as is feasible will be located within and adjoining the main built up area of Nottingham. For Gedling Borough, development continues at Teal Close, Netherfield and on the Gedling Colliery/Chase Farm site. In addition, strategic scale releases for growth are proposed including an extension to the **Teal Close site** to accommodate a further **360 homes**. The Sub Regional centre of Hucknall is also an appropriate location for growth and two sites which adjoin the Hucknall area are carried forward within the Preferred Approach document at Top Wighay Farm and land North of Papplewick Lane. In addition, an extension to the Sustainable Urban Extension at **Top Wighay Farm site** is proposed within existing safeguarded land for **640 homes**. These new developments will be exemplar in terms of design and will incorporate measures to adapt to and mitigate the effects of climate change, and reduce its causes. The remainder of Gedling's housing provision will be met through non-strategic allocations in the Part 2 Local Plan, which may include in or adjoining the Key Settlements for growth of Bestwood Village, Calverton and Ravenshead.
- 2.8 In terms of **employment** requirements and to fulfil the requirements of the NPPF and the Planning Practice Guidance, an Employment Land Needs Study was undertaken (Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study, Lichfields, May 2021). It used a variety of scenarios to assess a range of employment space needs for both industrial/warehousing space and office floorspace.
- 2.9 Based on this analysis, it was concluded that the regeneration scenario is the most appropriate level of growth to plan future requirements. It matches the aspirations of the D2N2 Local Economic Partnership's Strategic Economic Plan, will assist in recovery from Covid and help counter the likely impacts on the economy predicted for the early years of the plan period. Due to constrained boundaries and a lack of available sites, Nottingham City is unable to provide for the full identified industrial and warehousing need, however provision in the Borough Council areas offsets this. Strategic sites with available employment land in Gedling Borough include Teal Close and Top Wighay Farm. The converse is true for office development, with Nottingham providing for part of the identified needs of the Boroughs.
- 2.10 In addition, the Nottinghamshire Core and Outer Housing Market Area Logistics Study, July 2022 was commissioned to quantify the scale of strategic B8 logistics need across the Core/Outer Nottingham Housing Market Areas. The Councils have undertaken a "call" for strategic distributions sites and the Councils' approach to large scale distribution sites will be addressed at the next stage of Plan preparation.

- 2.11 The Preferred Approach recognises that all uses which generate employment, such as retail, health, education and civic/science-based institutions should be catered for. It identifies strategic locations for business including Nottingham City Centre. Economic development will also be encouraged associated with Universities, hospital campuses and Further Education sites.
- 2.12 This Preferred Approach document (**Appendix 1**) comprises an additional informal Regulation 18 consultation stage and the partner Councils are seeking views on the scope and content of this document. 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.
- 2.13 The Sustainability Appraisal is a legal requirement of plan preparation. The Preferred Approach: Sustainability Appraisal Report, December 2022 (**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.
- 2.14 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.
- 2.15 In terms of next steps, it is proposed that an extended eight week (rather than six weeks to allow for the Christmas holidays) consultation period will be undertaken commencing on 12<sup>th</sup> December 2022 and ending on 6<sup>th</sup> February 2023. Following consideration of consultation responses, a full Pre Submission version of the Strategic Plan will be published in the summer of 2023, prior to submission for examination later in 2023. 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. The Preferred Approach stage comprises the initial Regulation 18 stage and although the Strategic Plan has already been through one period of Regulation 18 consultation it has been considered prudent to carry out a further focussed informal consultation on the Preferred Approach which includes the Vision and housing and employment Objectives, Planning Strategy and proposed strategic 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. Given the Preferred Approach consultation document sets out the general thrust of key proposed approaches towards setting a Vision and Objectives, the location of development and amount of employment and housing the Equalities Impact Assessment is necessarily broad brush at this stage. 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 detail can be found in **Appendix 3**, 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 looks to identify the Vision and Objectives for housing and employment, the planning strategy and settlement hierarchy alongside the location of development and amount of housing and employment. It is not a full draft plan at this stage. However, the Vision states that 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** [preferred-approach-document-twf.pdf \(gnplan.org.uk\)](#)

**Appendix 2** [Preferred Approach: Sustainability Appraisal Report, December 2022](#) (scroll down to the 'Sustainability Appraisal' sub heading)

**Appendix 3** 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

Available at <https://www.gnplan.org.uk/consultations/greater-nottingham-strategic-plan-preferred-approach/> :-

- Preferred Approach: Heritage Assets Assessment, December 2022
- Preferred Approach: Housing Background Paper, December 2022
- Preferred Approach: Assessment of Housing Need and Capacity in Nottingham City, December 2022
- Preferred Approach: Employment Background Paper, December 2022
- Preferred Approach: Green Belt Background Paper, December 2022
- Preferred Approach: Site Selection Report, December 2022
- Preferred Approach: Green Belt Review Methodology, December 2022
- Preferred Approach: Infrastructure Delivery Plan Baseline Assessment, December 2022
- Preferred Approach: Habitats Regulations Assessment Review Paper,

December 2022

- Preferred Approach: Response to the Growth Options Consultation, December 2022

Available at <https://www.gnplan.org.uk/evidence-base/> :-

- Report of Consultation Responses: Growth Options, February 2022
- Joint Methodology Report for Strategic Housing Land Availability Assessments, Greater Nottingham Authorities, October 2022
- Nottinghamshire Core and Outer Housing Market Area Logistics Study, August 2022
- Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study, Lichfields, May 2021
- Nottingham Core Housing Market Area Boundary Study, Opinion Research Services, August 2018

## **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:**

**On behalf of the Chief Financial Officer**

**Approved by:**

**Date:**

**On behalf of the Monitoring Officer**