

Report to Council

Subject: Consultation on the Publication Draft Greater Nottingham Strategic Plan

Date: 17 October 2024

Author: Planning Policy Manager – Planning Policy

Wards Affected

All

Purpose

For Council to approve the Publication Draft Greater Nottingham Strategic Plan for a six-week period of consultation. Subject to no substantial issues arising from this consultation, for Council to approve the Publication Draft and Sustainability Appraisal to be submitted to the Secretary of State with associated evidence documents for independent examination.

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.

Recommendations

THAT:

- 1) The Publication Draft Greater Nottingham Strategic Plan and Sustainability Appraisal be approved in so far as it relates to Gedling Borough, to allow a period of public representations.**
- 2) Council approves the submission of the Publication Draft Greater Nottingham Strategic Plan and Sustainability Appraisal to the Secretary of State with associated evidence documents for independent examination under section 20 of the Planning and Compulsory Purchase Act 2004 subject to there not being the need for any substantial changes following consultation on the Publication Draft. Should the consultation confirm the need for substantial changes then this would require referral back to Council for approval at a later date.**
- 3) Council delegates authority to the Director of Place in consultation with the Chairman of Planning Committee to make any minor editing changes such as typographical, formatting or changes to imagery necessary to the Publication Draft Greater Nottingham Strategic Plan and any supporting evidence documents prior to consultation and/or submission.**

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. Subsequent reports have sought approval to consult on the Growth Options and Preferred Approach documents.
- 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 (adopted in 2018). 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.
- 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 In January/February 2023, the Councils consulted on the Greater Nottingham Strategic Plan Preferred Approach. This document did not include the full range of topics that form the Strategic Plan but focussed on the proposed vision and strategy alongside the housing and employment provision. A further Preferred Approach consultation on Strategic Distribution and Logistics took place in Autumn 2023.
- 1.7 The Councils have been updating the evidence to support the preparation of the full Strategic Plan and the consultation on the Publication Draft Greater Nottingham Strategic Plan (**Appendix 1**) comprises the first formal consultation stage. All documentation associated with the consultation will be available at <https://www.gnplan.org.uk/>, and include the Statement of Consultations (September 2024) which provides a comprehensive summary of consultation undertaken during the preparation of the strategic plan including summaries of comments made by consultees at the two Preferred Approach consultations together with a response by the Councils.

2 Proposal

2.1 Prior to its adoption, the Greater Nottingham Strategic Plan is required to go through a number of formal and informal consultation stages. The Publication Draft Greater Nottingham Strategic Plan represents the first formal stage of preparation. All of the consultation responses received as a result of the earlier consultations have been used to inform and shape the Greater Nottingham Strategic Plan as it has evolved. The Publication Draft Greater Nottingham Strategic Plan contains a **Vision** setting out the intended character of the plan area, describing what the plan area will look like in 2041. 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.

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 review of the Part 2 Local Plan.

2.4 In terms of the approach to **housing** need, the 2023 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. 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 The Government has recently (July 2024) published draft revisions to the NPPF and to the standard method for assessing local housing need. The draft standard method uses an area's housing stock rather than the 2014 household projections as its base, and does not include a 35% uplift for large

urban areas. The changes to the NPPF, amongst other things, reverse the changes made by the previous Government in 2023. The draft NPPF also contains transitional arrangement, whereby Local Plans at advanced stage of preparation can proceed to examination. Paragraph 226 of the draft NPPF states that: 'The policies in this Framework (published on [publication date]) will apply for the purpose of preparing local plans from [publication date + one month] unless one or more of the following apply:

- a) the emerging annual housing requirement in a local plan that reaches or has reached Regulation 19 (pre submission stage) on or before [publication date + one month] is no more than 200 dwellings below the published relevant Local Housing Need figure.'

- 2.6 For Gedling Borough Council, the draft standard method housing need would be 11,970 new homes over the Strategic Plan period (2023 – 2041). In order to comply with the NPPF transitional arrangements, the Borough Councils are increasing their housing targets over the level set by the current 2023 standard method (8,280 for Gedling Borough Council) to fall within the 200 dwelling threshold of the transitional arrangements. This results in a housing target for Gedling of 8,370.
- 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, the Publication Draft Strategic Plan promotes development on the edge of the Sub Regional Centre of Hucknall at the Top Wighay Farm site. This comprises the existing allocation (in the Aligned Core Strategy) for 805 dwellings and an extension to the north for a further 710 homes. This extension is slightly larger than that proposed through the previous Preferred Approach consultation (for 640 homes) and includes the entirety of the safeguarded land. However, the site specific policy (Policy 23) clarifies that the developable area will need to respond to constraints affecting the east and west of the site, including the setting of heritage assets (including Annesley Hall Registered Park and Garden and Linby Conservation Area, in particular St Michael's Church, Linby). Furthermore, mitigation in the form of significant green infrastructure areas should also ideally be sited on land in between new development at this allocation and the possible potential Special Protection Area for Sherwood Forest for Birds (nightjar and woodlark).
- 2.8 The Publication Draft Strategic Plan does not propose any amendment to the boundary of the Green Belt. The remainder of Gedling's housing provision (currently around 1,050 homes identified through the transitional arrangements but may increase further dependent on the Standard Method that is in force at the time) will be met through non-strategic allocations in future plan preparation, which may include in or adjoining the Key Settlements for growth of Bestwood Village, Calverton and Ravenshead.
- 2.9 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.

- 2.10 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 Top Wighay Farm. The converse is true for office development, with Nottingham providing for part of the identified needs of the Boroughs.
- 2.11 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 distribution sites and the Councils' approach to large scale distribution sites was set out in the Preferred Approach: Strategic Distribution and Logistics which was consulted on between September and November 2023. The Publication Draft Plan proposes to allocate a site at the former Bennerley Coal Disposal point (Broxtowe Borough) and on part of the former Ratcliffe on Soar Power Station site (Rushcliffe Borough). No sites are proposed within Gedling Borough. The two strategic allocations for large scale distribution and logistics will lead to a significant uplift in terms of the Plan Area's contribution to meeting regional needs for this specialist distribution and logistics sector.
- 2.12 The Publication Draft Strategic Plan 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.
- 2.13 Other policies to note include Policy 1 on Climate Change and Policy 16 on Blue and Green Infrastructure. Policy 1 requires development proposals to mitigate against and adapt to climate change, reflecting the Future Homes Standard and Future Building Standard which is expected to come into force in 2025, thereby setting out a commitment to these standards irrespective of whether continued to be progressed nationally. The introduction of these standards will be challenging but is an important step in the Councils' drive towards net zero.
- 2.14 Policy 16 takes a strategic approach to the delivery, conservation and enhancement of Blue and Green Infrastructure at a landscape scale, through the establishment of a connected network of Blue and Green Infrastructure and assets.
- 2.15 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. This Publication Draft Strategic Plan (**Appendix 1**) comprises the formal Regulation 19 consultation stage and the partner Councils are seeking views on the scope and content of this document.

- 2.16 The Sustainability Appraisal is a legal requirement of plan preparation. The Greater Nottingham Strategic Plan Sustainability Appraisal Report, September 2024 (**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 Publication Draft consultation.
- 2.17 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.
- 2.18 In terms of next steps, it is proposed that a six week consultation period will be undertaken once the Publication Draft Strategic Plan has been approved for consultation by each of the four authorities. Following consideration of consultation responses and subject to there not being a need for any substantial changes, the plan will be prepared for submission for examination in early 2025.

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 Publication Draft Plan. However, this comprises the formal stage of consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 19. Consultation will help the plan making authorities gain valuable insight and comments from stakeholders which will help to strengthen the Councils' position at the submission stage.
- 3.4 A further alternative would be to pause plan preparation in light of the draft 2024 NPPF. However, paragraph 226 sets out transitional arrangements for local plans that are to be published before, or within one month, of the

publication of the new NPPF, expected at the end of 2024. Where the emerging annual housing requirement is 200 dwellings or fewer below the published relevant Local Housing Need figure (derived from the draft new methodology), the plan can be examined under the current 2023 NPPF. The Councils intend to publish the Publication Draft Strategic Plan before the end of 2024 and are therefore proceeding under these transitional arrangements. The option of waiting for a final revised NPPF, conducting a further Green Belt review and starting the plan making process again has been rejected, as there is a pressing need to put adopted plans into place as soon as possible to provide planning certainty and ensure early delivery of strategic sites. Starting the plan making process from scratch would take several years and require a full update of the evidence base at considerable cost.

- 3.5 A further alternative is to pause progress on the Greater Nottingham Strategic Plan and for a Spatial Development Strategy to be prepared by the Combined Authority. However, for Spatial Development Strategies, paragraph 23 of the NPPF states that allocations and land use designations can only be included where the power to make allocations has been conferred which does not apply to the East Midlands Combined County Authority. As such, preparation of a Spatial Development Strategy would not enable Gedling Borough Council to allocate land to meet its housing target.
- 3.6 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 Publication Draft Greater Nottingham Strategic Plan 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 Publication Draft Greater Nottingham Strategic Plan 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 has progressed in tandem with the emerging Greater Nottingham Strategic Plan as part of an iterative process that has assessed more comprehensive and detailed policies and recommended changes through the Plan's preparation. Further detail can be found in **Background Paper 1**, Publication Draft Greater Nottingham Strategic Plan: Equality Impact Assessment, May 2024.
- 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 Publication Draft Greater Nottingham Strategic Plan 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. Other policies seek to address the impacts and challenges of climate change and the mitigation of its effects; and ensure new development contributes to carbon neutrality.

8 Climate Impact Assessment

- 8.1 The Council has taken the ambitious path of becoming net zero by 2030 and the impact of the Publication Draft Strategic Plan has been considered through the Climate Impact Assessment appended to this report at **Background Paper 2**. The assessment shows that the Publication Draft Strategic Plan would have a positive impact in addressing climate change issues.

9 Health Impact Assessment

- 9.1 A Health Impact Assessment, appended at **Background Paper 3**, has been produced to identify and consider the potential health and equality impacts of

the Publication Draft Greater Nottingham Strategic Plan. Health impacts of the Plan have also been considered through the Sustainability Appraisal process, Equality Impact Assessment and Climate Impact Assessment.

10 Appendices

Appendix 1 - Publication Draft Greater Nottingham Strategic Plan, September 2024

Appendix 2 - Greater Nottingham Strategic Plan Sustainability Appraisal Report, September 2024

11 Background Papers

Background Paper 1 - Publication Draft Greater Nottingham Strategic Plan: Equality Impact Assessment, September 2024

Background Paper 2 – Climate Impact Assessment

Background Paper 3 – Publication Draft Greater Nottingham Strategic Plan, Health Impact Assessment, September 2024

The following documents are available at

<https://www.gedling.gov.uk/resident/planningandbuildingcontrol/planningpolicy>

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- Aligned Core Strategy (September 2014)
- Gedling Borough Council Local Planning Document, July 2018
- Gedling Borough Statement of Community Involvement, September 2019

All evidence documents associated with the consultation are available at <https://www.gnplan.org.uk/evidence-base/>

12 Reasons for Recommendations

12.1 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.

12.2 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