Report of the Portfolio Holder for Economic Development and Asset Management

GREATER NOTTINGHAM STRATEGIC PLAN PREFERRED APPROACH

1. Purpose of Report

Broxtowe Borough, Gedling Borough, Nottingham City and Rushcliffe Borough Councils are preparing the Greater Nottingham Strategic Plan, which will cover the plan period 2022 to 2038, and will set out policies to secure sustainable growth.

The Councils are seeking approval to undertake a joint consultation for a period of eight weeks on the Greater Nottingham Strategic Plan Preferred Approach (Appendix 1). The consultation focuses on housing and employment provision and strategic sites, rather than the full range of topics which will be included in the final draft of the Strategic Plan. The approach has been informed by discussions and workshops held with the Joint Planning Advisory Board.

The responses received will then be considered as part of preparing the final draft of the Strategic Plan.

Once adopted, the Greater Nottingham Strategic Plan will replace the Greater Nottingham Aligned Core Strategies (Local Plan Part 1).

2. Recommendation

Cabinet is asked to RESOLVE that:

- 1. the Greater Nottingham Strategic Plan Preferred Approach, in so far as it relates to Broxtowe Borough, for public consultation be approved.
- 2. authority is delegated to the Head of Planning and Economic Development to approve any minor changes (e.g. presentational, typographical and grammatical) required to the Preferred Approach document and the evidence base prior to consultation.

3. Detail

It is a statutory requirement for Councils to have a development plan in place which identifies the strategic priorities of the area. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary. The Aligned Core Strategy was adopted in 2014 and is now being reviewed. Having an up-to-date plan provides greater certainty in respect of planning for housing and economic development and delivering the required infrastructure.

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.

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, and how these have informed the Preferred Approach, is included in the Preferred Approach: Response to the Growth Options Consultation (September 2022). For matters not relating to this consultation, responses will be provided as part of the Publication Draft of the Strategic Plan.

It was agreed by the Joint Planning Advisory Board that an additional focussed consultation should be undertaken prior to advancing to the Publication Version of the Strategic Plan (Regulation 19). The strategy and approach to housing distribution has been informed by the previous consultations and through discussions and workshops held with Councillors who represent the Councils on the Joint Planning Advisory Board. A draft of the Preferred Approach was also considered by the Joint Planning Advisory Board in September.

The following documents have been prepared to support the Preferred Approach:

- Preferred Approach: Sustainability Appraisal
- Preferred Approach: Site Selection Report
- Preferred Approach: Heritage Assets Assessment
- Preferred Approach: Housing Background Paper
- Preferred Approach: Assessment of Housing Need and Capacity in Nottingham City
- Preferred Approach: Employment Background Paper
- · Preferred Approach: Green Belt Review
- Preferred Approach: Green Belt Background Paper
- Preferred Approach: Infrastructure Delivery Plan Baseline Assessment
- Report of Consultation Responses: Growth Options
- Preferred Approach: Response to the Growth Options Consultation
- Preferred Approach: Habitats Regulations Assessment Paper

These documents and other evidence to support the preparation of the Strategic Plan are available to view at: https://www.gnplan.org.uk/consultations/greater-nottingham-strategic-plan-preferred-approach/

The proposed Preferred Approach document 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 proposed as part of this consultation. Objectives covering all aspects will be included as part of the Strategic Plan's publication stage.

The Preferred Approach includes a proposed Planning Strategy, which focuses on new development linking to and enhancing Blue and Green Infrastructure and promoting urban living within the main built-up area of Nottingham, 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. It promotes development of a lesser scale adjoining Hucknall (in Gedling Borough) and at key settlements across the Plan area. It seeks to embed the principles of the '20-minute neighbourhood' approach and recognises the economic development potential of key sites including Toton, the Ratcliffe on Soar Power Station (within Rushcliffe) and the wider Broad Marsh area (within Nottingham City).

The proposed Planning Strategy aims to meet housing and employment needs, based on a defined settlement hierarchy. This includes taking full account of current housing and employment supply and identifying strategic site allocations to meet any remaining need. Specific details for strategic sites are also identified, with key development requirements.

Housing

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.

The proposed approach is for each council to meet its own housing need as determined by the Government's standard method, except for Nottingham City. It is proposed that Nottingham City will meet as much of its housing need as it can. It is not proposed for the City Council's remaining unmet need to be met elsewhere in Greater Nottingham.

For Broxtowe, this results in 6,240 homes for the period 2022-2038. A 10% buffer is then applied to the housing need figure to allow for flexibility and to ensure that housing need is met.

	Housing Target	Minimum Flexibility Buffer
Broxtowe	6,240	10%
Gedling	7,950	10%
Nottingham City	25,760	0
Rushcliffe	9,950	10%
Greater Nottingham	49,900	N/A

In order to meet these housing targets, a number of proposed strategic sites and locations where growth will take place are identified within the Preferred Approach. An important point to note is that the majority of housing proposed is already identified or provided for in current Local Plans.

It is proposed that the large majority of Broxtowe's housing provision is to be provided within or adjoining the main built up area of Nottingham, in accordance with the preferred strategy. It will focus housing delivery in or adjacent to the main built up areas through utilising existing housing allocations from the Aligned Core Strategy and the Part 2 Local Plan:

- Field Farm, Stapleford: This is an existing allocation in the Aligned Core Strategy and it is proposed to carry forward the allocation. No additional growth is proposed above the existing allocation. Of the 450-unit outline planning permission, approximately 330 houses remain undeveloped.
- Boots: This is an existing allocation in the Aligned Core Strategy and it is proposed to carry forward the allocation. No additional growth is proposed above the existing allocation. There is a Reserved Matters application for 622 dwellings (406 in Broxtowe Borough and 216 in Nottingham City).
- Toton Strategic Location for Growth: The site was identified for growth in the Aligned Core Strategy and is an allocation in the Part 2 Local Plan for 500-800 homes up to 2028. It is considered that an allocation of 1,400 to 1700 homes up to 2038 is appropriate to support the growth aspirations in this location (the Part 2 Local Plan refers to a capacity of 3000 homes).
- Chetwynd Barracks: The site is an allocation in the Part 2 Local Plan for 500 homes up to 2028. It is considered an allocation of 1,500 homes is appropriate to support the growth aspirations in this location (the Part 2 Local Plan refers to a capacity of 1,500 homes).

No new allocations or Green Belt releases are proposed. Whilst Key Settlements are identified (Awsworth; Brinsley; Eastwood (including parts of Giltbrook and Newthorpe); and Kimberley (including parts of Nuthall and Watnall), the delivery of new homes at these Key Settlements over the Plan period will be achieved only through existing commitments comprising a combination of sites which have already been allocated by the Broxtowe Part 2 Local Plan (2019) and sites within the settlements which already have planning permission or come forward as infill or windfall sites. It is not proposed that any further land adjacent to any of the Key Settlements is allocated for housing development during the Plan period and there will be no Green Belt release.

The proposed approach to housing provision, distribution and site selection within Broxtowe is outlined and justified further in the Preferred Approach document, the Housing Background Paper and Site Selection Report (available as background documents). While a number of other potential site options have been put forward by developers, landowners and others, there is no requirement for the allocation of any new strategic housing within Broxtowe.

In total, the anticipated housing supply within Broxtowe Borough from 2022 to the end of the Plan period in 2038 is around 9,790. This exceeds the housing target, and gives confidence that the housing target will be met in the event that delivery on any of the sites does stall or slow.

A 35% uplift has been applied to the City's housing need as it is one of the 20 largest urban local authorities in the Country. The unmet need is part of the 35% uplift, and therefore not evidenced in terms of actual local housing need, nor in terms of delivery. The National Planning Practice Guidance references the 35% uplift and states that "This increase in the number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations." (Paragraph: 035 Reference ID: 2a-035-20201216). Provision elsewhere in Greater Nottingham would entail development in the Green Belt, which the Government has made clear can only happen in exceptional circumstances. The Councils do not consider un-evidenced need to constitute exceptional circumstances.

Based on the above, it is not proposed that Broxtowe, or any of the Councils, meet the City's unmet need.

Employment

In order to fulfil the requirements of the NPPF and the Planning Practice Guidance, an Employment Land Needs Study was undertaken. It used a variety of scenarios to assess a range of employment space needs for both industrial/warehousing space and office floorspace.

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 Enterprise Partnership's Strategic Economic Plan, will assist in recovery from the pandemic and help counter the likely impacts on the economy predicted for the early years of the Plan period as a result of the unforeseen rise in the cost of energy. Further details of the scenarios and the approach are set out in the Employment Background Paper (available as a background paper).

In order to meet this growth scenario, the following requirements for employment space across the housing market area are proposed:

- 294,500 sq. m of office space; and
- 180 ha of industrial and warehousing land.

As part of meeting this scenario, the sites at Toton and Chetwynd Barracks have been identified as having potential to generate significant growth providing jobs across all skill levels for both local people and new residents. Land is allocated in the Broxtowe Local Plan Part 2 at these sites for a mix of uses and includes a minimum provision of 18,000 square metres of employment floorspace including an innovation centre for new technologies and businesses to be delivered. Both sites are expected to deliver jobs into the 2040s.

A number of other potential employment site options have been put forward by developers, landowners, and others, particularly in the M1 corridor, but there is not the justification at this stage to identify further new strategic employment sites. Notwithstanding this, the Councils have recently undertaken a "call" for strategic distribution sites and the approach to large strategic distribution development will be addressed at the next stage of Plan preparation.

Next Steps

The Preferred Approach consultation will seek views on the proposed strategy and vision, the approach to housing and employment provision and the proposed strategic sites. The responses received will then be considered as part of preparing the Strategic Plan's publication draft.

Subject to approval by all four of the Councils, the aim is to consult on the Preferred Approach before the end of the year. Following consideration of consultation responses, a final draft of the Strategic Plan will likely be published in the summer of 2023, prior to submission for examination later in 2023.

Alternative options considered and reasons for rejection

The production of a Local Plan is a statutory duty. It will ensure a consistent and coherent planning policy approach across the wider area. It would be possible for the Borough Council to prepare a Local Plan without the involvement of the partner councils, but this has been rejected as significant cost savings are achieved in preparing a joint document covering more strategic matters.

In respect of the Preferred Approach, all reasonable alternatives have been assessed through the sustainability appraisal and site selection work undertaken as part of Plan preparation.

Risks and Uncertainties

Failure to review the Aligned Core Strategy would result in the Borough not having an up-to-date Development Plan. The absence of which would increase the risk of speculative unplanned development in Broxtowe and could weaken the Council's ability to effectively deal with all planning applications

4. Financial Implications

The comments from the Head of Finance Services were as follows:

The present workload required in preparing the Greater Nottingham Strategic Plan, in terms of the Council working jointly with partner authorities, will be undertaken utilising existing resources within Planning Policy. As such, there are no additional financial implications for the Council at this stage with any costs being contained within existing budgets. Any significant budget implications that might be required as the review progresses, over and above virement limits, would require approval by Cabinet.

5. <u>Legal Implications</u>

The comments from the Monitoring Officer / Head of Legal Services were as follows:

It is a statutory requirement, as set out in the Planning and Compulsory Purchase Act 2004, for the Council to have a Local Plan. Under the Town and Country Planning (Local Planning) (England) Regulations 2012, Local Plans must also be reviewed at least once every five years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

6. Human Resources Implications

No implications.

7. Union Comments

No implications.

8. <u>Data Protection Compliance Implications</u>

Consultation comments will be dealt with in accordance with the Greater Nottingham Planning Partnership's Joint Privacy Notice: www.gedling.gov.uk/jointprivacynotice

9. Equality Impact Assessment

As this is a new policy an equality impact assessment is included in the appendix to this report.

10. Background Papers

Nil