

Report of the Portfolio Holder for Economic Development and Asset Management

Greater Nottingham Strategic Plan - Publication Version (Regulation 19)

1. Purpose of Report

To seek approval to undertake a consultation on the Greater Nottingham Strategic Plan Publication Version (Regulation 19).

2. Recommendation

Cabinet is asked to RESOLVE that:

- 1) The Publication Draft Greater Nottingham Strategic Plan and supporting documents be approved in so far as it relates to Broxtowe Borough, to allow a period of public representations.**
- 2) Authority be delegated to the Head of Planning and Economic Development 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.**

3. Detail

Background

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 and they provide a consistent and coherent strategic spatial planning framework for the Nottingham Core (Greater Nottingham) Housing Market Area.

The Aligned Core Strategy was adopted in September 2014 and forms Part 1 of the Broxtowe Local Plan, providing the strategic context for the Part 2 Local Planning Document which was subsequently adopted in 2019.

There is a legal requirement to review local plans every five years. Broxtowe are preparing the Greater Nottingham Strategic Plan with Gedling Borough, Nottingham City and Rushcliffe Borough Councils. The next stage of plan preparation is to undertake a consultation on the Publication Version of the Strategic Plan (Regulation 19 of the Town and Country Planning Regulations

2012), which is included at **Appendix 2**. The Regulation 19 representation period is the last stage of public engagement before submitting the draft plan to the Inspectorate for examination.

Once adopted, the Greater Nottingham Strategic Plan will replace the Aligned Core Strategy.

Previous Consultations

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. Consultation on the Councils' 'Preferred Approach' was undertaken in January and February 2023. This consultation focused on the vision and strategy for meeting longer term development needs, including the approach to housing provision and employment need as well as the strategic sites required to meet requirements. This was supported by the document Preferred Approach: Response to the Growth Options Consultation (December 2022) which contains the Councils' response to consultation comments for matters relating to the Preferred Approach Consultation.

Following a call for logistics sites in 2022, a further Preferred Approach consultation was undertaken between September and November 2023. The consultation focused on strategic distribution and logistics and included the proposed allocation of two sites, the former Bennerley Coal Disposal Point in Broxtowe and land in the vicinity of the Ratcliffe-on-Soar Power Station in Rushcliffe.

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. Further details are contained within the Greater Nottingham Strategic Plan Publication Draft (Regulation 19) Statement of Consultation (September 2024). This document provides a comprehensive summary of consultation undertaken during the preparation of the strategic plan including summaries of comments made by consultees.

Publication Draft of the Greater Nottingham Strategic Plan

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 in **Appendix 1**. All documentation associated with the consultation will be available at www.gnplan.org.uk/evidence-base/

Vision and Strategy

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.

The spatial strategy defines the settlement hierarchy to accommodate growth in Greater Nottingham. This is firstly to accommodate growth in and adjacent to the main built up area of Nottingham; secondly adjacent to the Sub Regional Centre of Hucknall; and thirdly in or adjacent to Key Settlements (see Strategic Plan glossary for definitions). In other settlements (including villages) development will be smaller scale, which will be defined in subsequent plan preparation.

The spatial strategy will ensure that key aims are met; promoting brownfield development, making the best use of land, minimising Green Belt development, and ensuring that new development can benefit from and enhance existing infrastructure wherever possible.

Housing

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.

However, 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 areas housing stock rather than 2014 household projections as its base, and does not include a 35% uplift for large urban areas such as Nottingham City.

The new standard method significantly increases Broxtowe's housing need, from 384 per year to 658 per year. The changes to the NPPF, amongst other things, reverse the changes made by the previous Government in 2023. The draft NPPF also contains transitional arrangements, whereby Local Plans at an 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;*”

The intention is to proceed under the transitional arrangements and therefore be assessed against the 2023 NPPF. In order to comply with the transitional arrangements, Broxtowe’s housing target is set at 458 dwellings per year which is 8250 dwellings over the plan period. The same approach has been followed by Gedling and Rushcliffe Borough Councils which both have housing targets set no lower than 200 below the proposed new standard method figure.

For Nottingham City, the draft standard method housing need is 26,118 new homes over the Strategic Plan period (2023 to 2041). However, Nottingham City has a housing land supply estimated at 26,690, and it is proposed that this higher figure is adopted as the City’s Housing target, to fit with their growth ambitions.

	GNSP Housing Target 2023-2041
Broxtowe Borough	8,250
Gedling Borough	8,370
Nottingham City	26,690
Rushcliffe Borough	11,360
Greater Nottingham	54,680

The large majority of Broxtowe’s housing target is to be provided within or adjoining the main built up area. Three housing allocations are included within the Strategic Plan:

- Boots (existing allocation being carried forward)
- Field Farm (existing allocation being carried forward)
- Toton and Chetwynd Barracks (2,700 homes in the Plan period)

Boots and Field Farm are existing allocations and are being ‘carried forward’ in the Strategic Plan to ensure there are policies in place should any revised planning applications be submitted.

Toton and Chetwynd Barracks are existing allocations in the Part 2 Local Plan. The allocations have been combined to form a single allocation to reflect the need to ensure a coordinated approach to infrastructure delivery and to reflect the single Supplementary Planning Document which covers the site. An additional parcel of land to the north of the tram line is proposed to be removed from the Green Belt and added to the allocation to facilitate the delivery of key transport infrastructure. The Strategic Plan sets out “exceptional circumstances” required to justify this further Green belt release.

Employment

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.

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 Broxtowe include Toton Strategic Location for Growth. The converse is true for office development, with Nottingham providing for part of the identified needs of the Boroughs.

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 was set out in the Preferred Approach: Strategic Distribution and Logistics document which was consulted on between September and November 2023.

The Publication Draft Plan proposes to allocate sites at the former Bennerley Coal Disposal Point on 61 hectares of land and on part of the former Ratcliffe on Soar Power Station Site on 36.4 hectares (Rushcliffe Borough). These sites benefit from rail connections and are partly brownfield. The Bennerley allocation includes the requirement to deliver a country park as part of the development and sets out exceptional circumstances required to justify Green Belt release.

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.

Planning Policies

In addition to housing and employment, the Publication Draft Plan contains a range of planning policies covering key topics including Climate Change, Green Belt, Town and District Centres and Blue and Green Infrastructure. A full list of policies is included below:

- Policy 1: Climate Change, Sustainable Design, Construction, Energy and Managing Flood Risk

- Policy 2: The Spatial Strategy
- Policy 3: Housing Target
- Policy 4: The Green Belt
- Policy 5: Employment Provision and Economic Development
- Policy 6: Nottingham City Centre
- Policy 7: Role of Town and Other Centres
- Policy 8: Housing Size, Mix and Choice
- Policy 9: Gypsies, Travellers and Travelling Showpeople
- Policy 10: Design and Enhancing Local Identity
- Policy 11: The Historic Environment
- Policy 12: Local Services and Healthy Lifestyles
- Policy 13: Culture, Tourism and Sport
- Policy 14: Managing Travel Demand
- Policy 15: Transport Infrastructure Priorities
- Policy 16: Blue and Green Infrastructure, Parks and Open Space
- Policy 17: Biodiversity
- Policy 18: Developer Contributions for Infrastructure
- Policy 19: Strategic Allocation at Boots
- Policy 20: Strategic Allocation Field Farm (Broxtowe)
- Policy 21: Strategic Allocation Toton and Chetwynd Barracks (Broxtowe)
- Policy 22: Strategic Allocation Former Bennerley Coal Disposal Point (Broxtowe)
- Policy 23: Strategic Allocation Top Wighay Farm (Gedling)
- Policy 24: Strategic Allocation Former Stanton Tip
- Policy 25: Strategic Allocation Broad Marsh
- Policy 26: Strategic Allocation Melton Road, Edwalton (Rushcliffe)
- Policy 27: Strategic Allocation Land North of Bingham (Rushcliffe)
- Policy 28: Strategic Allocation Former RAF Newton (Rushcliffe)
- Policy 29: Strategic Allocation Former Cotgrave Colliery (Rushcliffe)
- Policy 30: Strategic Allocation South of Clifton (Rushcliffe)
- Policy 31: Strategic Allocation East of Gamston / North of Tollerton (Rushcliffe)
- Policy 32: Strategic Allocation Former Ratcliffe on Soar Power Station (Rushcliffe)

The Sustainability Appraisal is a legal requirement of plan preparation. The Greater Nottingham Strategic Plan Sustainability Appraisal Report, September 2024 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.

A summary of the Sustainability Appraisal undertaken as part of the Strategic Plan can be viewed here: <https://www.gnplan.org.uk/media/odhng3o3/sa-non-technical-summary-september-2024.pdf>

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.

The consultation statements can be viewed here:

Publication Version Statement of Consultation:

<https://www.gnplan.org.uk/media/rgonoax1/gnsp-statement-of-consultation-regulation-19-sept-2024.pdf>

Preferred Approach: Response to the Growth Options Consultation, December 2022: www.gnplan.org.uk/media/w25l02xx/preferred-approach-response-to-the-growth-options-consultation.pdf

Report of Consultation Responses: Growth Options, February 2022:

www.gnplan.org.uk/media/mnco0kmt/report-of-consultation-responses-growth-options.pdf

Next Steps

This Publication Draft Plan comprises the formal Regulation 19 consultation stage. 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.

It is proposed that the consultation period will be undertaken for six weeks and this is likely to start in early November, subject to the respective other Councils' approval processes. Following consideration of consultation responses, a plan will be prepared for submission for examination in 2025. This timetable may have to be amended in response to planning reform, as the Government's approach becomes clearer over the coming months.

Alternative Options

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.

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.

A further alternative would be to not consult on the Publication Draft Plan. However, the NPPF 2024 consultation states that Councils who do not proceed under the transitional arrangements would have to meet the new Standard Method Figure. This is likely to require an additional 2000 dwellings to be allocated within Broxtowe for the plan period (up to 2041).

A further alternative is to pause progress on the Greater Nottingham Strategic Plan and for a Spatial Development Strategy (SDS) to be prepared by the Combined Authority. However, neither what would be included within this nor the timescales for producing it is currently clear. Furthermore, an SDS could not allocate sites.

4. Key Decision

This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as it will be significant in terms of its effects on communities living or working in an area comprising two or more Wards or electoral divisions in the Council's area.

5. Updates from Scrutiny

Not applicable. Previous stages of the plan preparation have been subject to scrutiny and consultation.

6. Financial Implications

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

The adoption of planning strategies and delivery of the outcomes will always have the potential to impact on the Council's operations and its medium-term financial strategy.

There are no additional financial implications for the Council at this stage of the process 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.

7. Legal Implications

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 (as amended, including by the Levelling-up and Regeneration Act 2023), 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.

8. Human Resources Implications

The comments from the Human Resources Manager were as follows:

Not applicable.

9. Union Comments

The Union comments were as follows:

Not applicable.

10. Climate Change Implications

The Greater Nottingham Strategic Plan includes a specific policy relating to climate change (Policy 1) which seeks to set carbon standards for new development and identifies the key role that land use planning has in relation to Councils meeting their local carbon targets. The policy also includes measures to mitigate the impact of climate change, for adaptation to meet the challenges of climate change and to build resilience to cope with the impacts of climate change.

11. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

An Equality Impact Assessment has been undertaken as part of the preparation of the Strategic Plan and forms part of the evidence base. This is included in Appendix 3.

13. Background Papers

Appendix 1 provides a full list of evidence documents which are published at www.gnplan.org.uk/evidence-base .

Appendix 1

List of Background Papers and Evidence Documents

www.gnplan.org.uk/evidence-base

Main Document

Document Title	Author	Date
Greater Nottingham Strategic Plan Publication Version	Greater Nottingham Authorities	September 2024

Background Papers

Document Title	Author	Date
Employment Background Paper	Greater Nottingham Authorities	September 2024
Gedling Borough Council Housing Background Paper	Gedling Borough Council	September 2024
Green Belt Background Paper	Greater Nottingham Authorities	September 2024
Housing Background Paper	Greater Nottingham Authorities	September 2024
Transport Modelling Background Paper	Greater Nottingham Authorities	September 2024
Biodiversity Net Gain Background Paper	Greater Nottingham Authorities	September 2024
Strategic Distribution and Logistics Background Paper	Greater Nottingham Authorities	September 2023

Evidence Documents

Document Title	Author	Date
Carbon Policy Support: Evidence Base	Bioregional	April 2024
Carbon Policy Support: Offsetting	Bioregional	April 2024
Equality Impact Assessment	Greater Nottingham Authorities	September 2024
Greater Nottingham & Ashfield: First Homes Update	Iceni Projects	August 2022

Document Title	Author	Date
Greater Nottingham & Ashfield: Gypsy and Traveller Accommodation Assessment	RRR Consultancy Ltd	March 2021
Greater Nottingham & Ashfield: Housing Needs Assessment	Iceni Projects	October 2020
Greater Nottingham and Ashfield: Housing Needs Update	Iceni Projects	March 2024
Greater Nottingham Blue and Green Infrastructure Strategy	Greater Nottingham Authorities	January 2022
Greater Nottingham Centres Study	Nexus Planning	June 2024
Greater Nottingham Centres Study Appendix 1: 20 Minute Neighbourhood Analysis	Nexus Planning	June 2024
Greater Nottingham Centres Study Appendix 2: City, Town and District Centre Recommendations	Nexus Planning / BAS Consultancy	June 2024
Greater Nottingham Centres Study Appendix 3: Nottingham City Centre Healthcheck	Nexus Planning	June 2024
Greater Nottingham Centres Study Appendix 4: Town Centre Healthchecks	Nexus Planning	June 2024
Greater Nottingham Centres Study Appendix 5: District Centre Healthchecks	Nexus Planning	June 2024
Greater Nottingham Centres Study Appendix 6: Local Centre Healthchecks	Nexus Planning	June 2024
Greater Nottingham Centres Study Appendix 7: Centres of Neighbourhood Importance Matrix	Nexus Planning	June 2024

Document Title	Author	Date
Greater Nottingham Centres Study Appendix 8: Recommended Boundary Maps	Nexus Planning	June 2024
Greater Nottingham Growth Options Study	AECOM	July 2020
Greater Nottingham Growth Options Study: Additional Landscape Assessments	Brindle & Green	November 2022
Green Belt Review Methodology	Greater Nottingham Authorities	September 2024
Green Belt Review: Broxtowe Appendix	Greater Nottingham Authorities	September 2024
Green Belt Review: Gedling Appendix	Greater Nottingham Authorities	September 2024
Green Belt Review: Nottingham City Appendix	Greater Nottingham Authorities	September 2024
Green Belt Review: Rushcliffe Appendix	Greater Nottingham Authorities	September 2024
Habitats Regulations Assessment	Lepus Consulting	July 2024
Health Impact Assessment	Greater Nottingham Authorities	September 2024
Heritage Assets Assessment	Greater Nottingham Authorities	July 2024
Infrastructure Delivery Plan	Greater Nottingham Authorities	September 2024
Joint Methodology Report for Strategic Housing Land Availability Assessments	Greater Nottingham Authorities	November 2023
Key Settlements Review	Greater Nottingham Authorities	September 2024
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
Nottinghamshire Core & Outer HMA Logistics Study	Iceni Projects	August 2022

Document Title	Author	Date
Policies Map Amendments Document	Greater Nottingham Authorities	September 2024
Review of the Councils' Strategic Housing Land Availability Assessments (SHLAAs)	ARUP	July 2019
Site Selection Report	Greater Nottingham Authorities	September 2024
Site Selection Report Appendix A: Broxtowe	Greater Nottingham Authorities	September 2024
Site Selection Report Appendix B: Gedling	Greater Nottingham Authorities	September 2024
Site Selection Report Appendix C: Nottingham City	Greater Nottingham Authorities	September 2024
Site Selection Report Appendix D: Rushcliffe	Greater Nottingham Authorities	September 2024
Statement of Consultation	Greater Nottingham Authorities	September 2024
Strategic Flood Risk Assessment Review	Greater Nottingham Authorities	April 2024
Strategic Transport Modelling	Systra / Arup	Commenced, final report anticipated early 2025
Transport Modelling Mitigation Overview	Systra / Arup	2024
Transport Modelling Report: Initial Outputs	Systra	2023
Sustainability Appraisal Non-Technical Summary	Greater Nottingham Authorities	September 2024
Sustainability Appraisal Main Report	Greater Nottingham Authorities	September 2024
Sustainability Appraisal Appendix A Review of Plans and Programmes	Greater Nottingham Authorities	September 2024
Sustainability Appraisal Appendix B Baseline	Greater Nottingham Authorities	September 2024

Document Title	Author	Date
Sustainability Appraisal Appendix C Consultation Comments	Greater Nottingham Authorities	September 2024
Sustainability Appraisal Appendix D Appraisal of Objectives and Policies	Greater Nottingham Authorities	September 2024
Sustainability Appraisal Appendix E Broxtowe Sites	Greater Nottingham Authorities	September 2024
Sustainability Appraisal Appendix F Gedling Sites	Greater Nottingham Authorities	September 2024
Sustainability Appraisal Appendix G Nottingham City Sites	Greater Nottingham Authorities	September 2024
Sustainability Appraisal Appendix H Rushcliffe Sites	Greater Nottingham Authorities	September 2024
Viability Study (Plan-wide)	Porter PE	September 2024
Water Cycle Study	Greater Nottingham Authorities	April 2024