report

meeting JOINT COMMITTEE ON STRATEGIC PLANNING & TRANSPORT

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from: JOINT OFFICER STEERING GROUP

## Joint Structure Plan – Representations on the Deposit Draft

### Purpose of Report

To inform the Committee of the representations made on the draft Joint Structure Plan (JSP) and of the process of analysing and dealing with the comments made.

### Background

- 1. The draft JSP was placed on deposit in November 2003 and the objection period ended on the 19<sup>th</sup> December.
- 2. Within the objection period, 122 separate people or organisations made representations on the Plan. These included the seven District Councils and the Regional Government Office as well as representations from statutory bodies, several Parish Councils, neighbouring authorities, business, community and environmental groups, and members of the general public. Most bodies raised more than one issue so that there are almost fifteen hundred specific representations on aspects of the Plan, or omissions from the Plan.

### Nature of the Representations

- 3. Not all the 1500 separate representations are objections to the Plan. Many aspects of the Plan have been specifically supported and some objections are on matters of detail to policies rather than the principle of those policies.
- 4. Some objectors mostly representing house building interests are requesting that the JSP should not be prepared given the national planning review and the progress of the Planning and Compulsory Purchase Bill and would wish forward planning in the geographic County to be based on the current Structure Plan (adopted in November 1996).
- 5. The scale of housing in the Plan area, its distribution and phasing aspects of the draft JSP have come in for much comment. Some argue that the overall total of housing for the Plan period should be raised above the Regional Planning Guidance (RPG) figure by some 4000 dwellings to take into account the apparent shortfall of housing in the period 1991-2001 using an annualised rate of house building to the adopted Structure Plan housing provision totals.

- 6. Others argue that the scale of housing in the three sub-areas should be altered – for the South Notts. Sub-Area, some argue a higher and others a lower figure, with many comments about redistributing the amount of housing given to individual Districts reducing the scale of housing proposed for the City and increasing the housing provision totals in neighbouring Districts, in particular Rushcliffe and Gedling Boroughs. For the West and North-West Notts. Sub-Area, most comments are requesting a (significant) increase in the housing provision totals. For the East Notts. Sub-Area, the main comments relate to the balance struck between urban and rural housing provision and between the scale of housing directed to the two market towns - Newark and Retford.
- 7. Many respondents queried the policy limit on housing totals on sites outside urban areas and upon the principle and detail of the phasing policy designed to ensure that "brownfield" sites are given priority over "greenfield" sites.
- 8. Turning to the economy and employment land, there have been objections that the overall levels of employment land provision are to high or too low in the various Sub-Areas of the geographic County. A number of representations have been made
  - a) about the validity of defining a quantum of employment land provision derived using past trends of take-up;
  - b) about the validity/suitability of a 50% mark-up on top of the amount of employment land derived using past trends
  - c) about the desirability of setting a target of 60% of employment land provision to be on previously developed land;
  - d) on the interaction/balance between employment land provision in an area and the scale of housing provision;
  - e) on the realism of the policy regarding de-allocation of former employment land proposals;
  - f) on the scale and distribution of employment land provision in surrounding Districts to Nottingham to meet the shortfall of provision arising within the Unitary Authority area, and the relationship of the shortfall to the scale of new housing in the City area;
  - g) on the provision of greenfield employment land sites associated with MARR in the Mansfield/Ashfield area.
- 9. A study has been jointly commissioned with a local surveyor/valuation firm to provide market advice on the representations made to the draft Plan on economy issues. The study will report in time for Committee to be informed of the outcome at its next meeting and the findings will feed into the Councils' responses to relevant issues at the EiP.
- 10. There is general support for measures to assist cyclists, pedestrians and people with restricted mobility, and for improving public transport. However, there are concerns about the failure to cater for horse-riders, and some reservations about Park & Ride. There is strong support for improved public transport links to Nottingham East Midlands Airport. There is a general suggestion that the Plan has an urban focus and more consideration needs to be given to the more rural parts of the County.

- 11. As to be expected there is both support and objection to Light Rail proposals. There is good support for the approach to Passenger Heavy Rail, but also criticism that there are only limited heavy rail proposals. Freight policy received general support. There has been mixed reaction to protecting linear transport routes, with support from a transport perspective but objection should such routes be lost for recreational purposes.
- 12. With regard to traffic reduction and parking provision for new developments, there has been good support, although some reservations have been expressed that under-provision of parking may cause problems. Comments have also been received in respect of public transport corridors no longer featuring in the Plan.
- 13. The proposed hierarchy of roads received little comment, apart from a suggestion that the A612 through Southwell should not be a Category 1 road. Trunk Road proposals have been well supported, but concerns have been expressed that trunk road capacity is being increased instead of improving public transport. With regard to the Local Authority Road Schemes, some concerns have been raised in respect of road schemes generally and several objections have been raised to the proposed New Crossing over the River Trent.
- 14. There are a large number of representations on the Environment and Natural Resources Chapter. Most of these representations relate to fairly detailed matters of the specific wording of, rather than the principle, of a policy. Regarding the more general comments, there was concern that there were too few policies notably on waste and minerals though others thought that there were too many policies. This reflects the difficult balance to strike in providing a strategic planning framework for this topic which is neither too broad nor too detailed.
- 15. The other topic areas on leisure/tourism and shopping received fewer representations, the main comments relating to keeping the JSP shopping hierarchy consistent with the RPG definitions.

### Future Steps

- 16. Officers of both Councils are analysing the representations in detail and are preparing a draft list of likely issues to be debated at the Examination-in-Public in consultation with the EiP Panel. The EiP itself is scheduled to begin on 22<sup>nd</sup> June and last until 9<sup>th</sup> July and will be held at the Galleries of Justice. A procedural meeting is to be held on the 1<sup>st</sup> April at which a draft list of issues and participants will be discussed.
- 17. If a draft list is available by the time of the meeting of this Committee, an oral report will be made.
- 18. Members will be aware that the A52 Multi-Modal Study Consultant's Report was launched on 10<sup>th</sup> March and makes certain recommendations with regard to a

possible further Trent Crossing between Lady Bay and Gunthorpe bridges. It is currently programmed that a report on the Consultant's findings and recommendations will be taken to the next meeting of this Committee, scheduled for 21<sup>st</sup> May, and this will enable the Joint Committee to advise the two Councils before both Authorities resolve their positions and submit them to the Regional Assembly which will make its recommendations to the Secretary of State at a meeting to be held on 9<sup>th</sup> July.

19. As regards other possible areas of amendment to the JSP, these would be set out in a report to the next Joint Committee.

# RECOMMENDATION

20. It is RECOMMENDED that the report be noted.

Background papers
None

**Contact Officers** 

Matthew Gregory, Development Department, Nottingham City Council Richard Ling, Culture and Community Department, Nottinghamshire County Council

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