

Executive Board – 22nd November 2022

Subject:	The Greater Nottingham Strategic Plan: Preferred Approach - approval to consult
Corporate Director(s)/Director(s):	Sajeeda Rose, Corporate Director for Growth and City Development Paul Seddon, Director of Planning and Regeneration
Portfolio Holder(s):	Councillor Pavlos Kotsonis, Portfolio Holder for Leisure, Culture and Planning
Report author and contact details:	Peter McAnespie Peter.mcanespie@nottinghamcity.gov.uk
Other colleagues who have provided input:	Matt Gregory
Subject to call-in:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Key Decision:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Criteria for Key Decision:	
(a)	<input type="checkbox"/> Expenditure <input type="checkbox"/> Income <input type="checkbox"/> Savings of £750,000 or more taking account of the overall impact of the decision
and/or	
(b)	Significant impact on communities living or working in two or more wards in the City <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Type of expenditure:	<input type="checkbox"/> Revenue <input type="checkbox"/> Capital If Capital, provide the date considered by Capital Board Date:
Total value of the decision:	Nil
Wards affected:	all
Date of consultation with Portfolio Holder(s):	
Relevant Council Plan Key Outcome:	
Clean and Connected Communities	<input checked="" type="checkbox"/>
Keeping Nottingham Working	<input checked="" type="checkbox"/>
Carbon Neutral by 2028	<input checked="" type="checkbox"/>
Safer Nottingham	<input type="checkbox"/>
Child-Friendly Nottingham	<input type="checkbox"/>
Healthy and Inclusive	<input type="checkbox"/>
Keeping Nottingham Moving	<input type="checkbox"/>
Improve the City Centre	<input type="checkbox"/>
Better Housing	<input type="checkbox"/>
Financial Stability	<input type="checkbox"/>
Serving People Well	<input type="checkbox"/>
Summary of issues (including benefits to citizens/service users):	
<p>Nottingham City together with Broxtowe Borough, Gedling Borough and Rushcliffe Borough Councils (“the 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.</p> <p>If approved by Nottingham City Council and the three Borough Councils, the Greater Nottingham Strategic Plan Preferred Approach (Regulation 18 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012) will be published for consultation in order to seek views on the proposed strategy and vision, the approach to housing and employment provision and the proposed strategic sites.</p> <p>Responses will then be considered as part of preparing the next version of the Strategic Plan which will be the Publication Draft (Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012).</p>	

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

Does this report contain any information that is exempt from publication?

No

Recommendation(s):

1 That the “Greater Nottingham Strategic Plan - Preferred Approach” appended to this report is approved in so far as it relates to Nottingham City, for a period of public consultation.

2 To delegate authority to the Director of Planning and Regeneration to approve any minor changes (e.g. typographical and grammatical) required to the Preferred Approach document and the evidence base prior to consultation.

1. Reasons for recommendations

1.1 Consultation on the Preferred Approach document and the associated evidence base will contribute to the robustness of the next version of the Strategic Plan. Such documents must be approved by Executive Board prior to the commencement of a statutory consultation period. The Preferred Approach does not include the full range of topics which will be included in the Strategic Plan, but focusses on housing and employment provision, as these are the most contentious issues the Strategic Plan must address.

2. Background (including outcomes of consultation)

2.1 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.

2.2 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 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 Publication Draft of the Strategic Plan.

2.3 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 at para 15. All documentation associated with the consultation is available at <https://www.gnplan.org.uk/preferredapproach>

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

1. Preferred Approach: Sustainability Appraisal Document, December 2022
2. Preferred Approach: Site Selection Report, December 2022
3. Preferred Approach: Heritage Assets Assessment, December 2022
4. Preferred Approach: Housing Background Paper, December 2022

5. Preferred Approach: Assessment of Housing Need and Capacity in Nottingham City, December 2022
6. Preferred Approach: Employment Background Paper, December 2022
7. Preferred Approach: Green Belt Review, December 2022
8. Preferred Approach: Green Belt Background Paper, December 2022
9. Preferred Approach: Infrastructure Delivery Plan Baseline assessment, December 2022
10. Preferred Approach: Habitats Regulations Assessment Review Paper, December 2022
11. Report of Consultation Responses: Growth Options, February 2022
12. Preferred Approach: Response to the Growth Options Consultation, December 2022

2.5 The Preferred Approach document (Appendix 1) 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 next iteration of the Strategic Plan.

HOUSING

- 2.6 The focus is proposed to be 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 the regeneration of parts of the urban area.
- 2.7 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. 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.
- 2.8 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. Including the 35% uplift, Nottingham City's standard method need between 2022 and 2038 is 28,368, against an estimated supply of 25,760, a difference of 2,608.
- 2.9 Due to Green Belt constraints, the Borough Councils have not agreed to provide for any of Nottingham City's unmet need, so their housing targets are based on their standard method housing need.
- 2.10 Due to its constrained boundaries, all development within Nottingham City is proposed to be provided within the main built up area (any further opportunities adjoining the urban area are likely to be very limited). The approach is strongly focused on economic development in the City Centre,

particularly as part of the Canal and Creative Quarters, and elsewhere at the Boots campus, and existing employment sites such as the former Horizon Factory. Housing provision reflects other key Nottingham City priorities, particularly increasing the level of family housing provided in new development, to ensure the maintenance of balanced communities, and to allow choice to residents who would otherwise have to leave the City to meet their housing needs.

- 2.11 Early provision of housing has been identified at existing deliverable sites such as the Waterside, and other currently allocated sites. Strategic sites are also proposed at Stanton Tip, Boots campus and the Broad Marsh area however it is recognised that these will take longer to deliver their full potential, so delivery of homes on Stanton Tip and Broad Marsh in particular is expected later in the plan period.

EMPLOYMENT

- 2.12 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.
- 2.13 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 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. The converse is true for office development, with Nottingham providing for part of the identified needs of the Boroughs.
- 2.14 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 and Boots. Economic development will also be encouraged associated with Universities, hospital campuses and Further Education sites.

NEXT STEPS

- 2.15 Subject to agreement by all four authorities, it is proposed that an 8-week formal consultation period will be undertaken. (Provisionally from December 2022 to 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 will become clearer over the coming months.

3. Other options considered in making recommendations

- 3.1 None, the production of a Local Plan is a statutory duty. It would be possible for Nottingham City Council to prepare a Local Plan without the involvement of the partner Borough Councils, but this has been rejected as significant cost savings are achieved in preparing a joint document, which also ensures a consistent and coherent planning policy approach across the wider area.

4. **Consideration of Risk**

4.1 None at this stage.

5. **Finance colleague comments (including implications and value for money/VAT)**

The production of a Local Plan is a statutory requirement for the Council. There are no direct financial implications from the consultation on the Preferred Approach and the work has been undertaken using current existing resources earmarked for this purpose and therefore is supported and places no pressure on the MFTP. This will be monitored by the service for any variance and reflected in the monthly forecast for the service.

Comments provided by Paul Rogers - Commercial Finance Business Partner (Growth and City Development) Finance | Finance and Resources. 12th October 2022.

6. **Legal colleague comments**

As indicated in the main body of the report, the Council is under a statutory duty to produce a Local Plan of which the Strategic Plan is part. Requirements relating to the production and adoption of such a plan are prescribed by regulations. The approval of such documents is not the sole function of the Executive and only full Council can approve the final submission version of the Strategic Plan for independent examination. Although the Strategic Plan has already been through one period of Reg 18 consultation it is prudent to carry out a further Reg 18 consultation on the Preferred Approach to housing and employment and proposed strategic sites to strengthen the Council's position at the submission stage.

Comments provided by Ann Barrett, Team Leader, Legal Services, Finance and Resources - 14 October 2022

7. **Other relevant comments**

Property Services have been and continue to be consulted as appropriate throughout the preparation of the Strategic Plan. The Preferred Approach proposes to increase the provision of new homes and employment opportunities, assist in regeneration and generate capital receipts in respect of the Broad Marsh strategic site for the Council.

Comments provided by Beverley Gouveia, Disposals & Development Manager, 14th October 2022.

8. **Crime and Disorder Implications (If Applicable)**

8.1 None.

9. **Social value considerations (If Applicable)**

9.1 The Greater Nottingham Strategic Plan provides the planning framework for future housing and employment development.

10. Regard to the NHS Constitution (If Applicable)

10.1 None.

11. Equality Impact Assessment (EIA)

11.1 Has the equality impact of the proposals in this report been assessed?

No

An EIA is not required because:
(Please explain why an EIA is not necessary)

Yes

Attached as Appendix 2, and due regard will be given to any implications identified in it.

12. Data Protection Impact Assessment (DPIA)

12.1 Has the data protection impact of the proposals in this report been assessed?

No

A DPIA is not required because:
(Please explain why a DPIA is not necessary)

Yes

Attached as Appendix 3 is the DPIA prepared for the Inovem database being used for this consultation, and due regard will be given to any implications identified in it.

13. Carbon Impact Assessment (CIA)

13.1 Has the carbon impact of the proposals in this report been assessed?

No

A CIA is not required because:
(Please explain why a DPIA is not necessary)

Yes

Attached as Appendix 4, and due regard will be given to any implications identified in it.

14. List of background papers relied upon in writing this report (not including published documents or confidential or exempt information)

14.1 None.

15. Published documents referred to in this report

15.1 The Greater Nottingham Aligned Core Strategy (Local Plan Part 1), Adopted September 2014.

15.2 Nottingham City Land and Planning Policies Development Plan Document (Local Plan Part 2), Adopted January 2020.

- 15.3 Nottingham Core Housing Market Area Boundary Study, Opinion Research Services August, 2018
- 15.4 Review of the Councils' Strategic Housing Land Availability Assessments (SHLAAs), ARUP, July, 2019
- 15.5 Greater Nottingham Growth Options Study, AECOM, July, 2020
- 15.6 Greater Nottingham & Ashfield Housing Needs Assessment, Icen Projects, October, 2020
- 15.7 Joint Methodology Report for Strategic Housing Land Availability Assessments, Greater Nottingham Authorities, November, 2021
- 15.8 Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study, Lichfields, May 2021
- 15.9 Greater Nottingham and Ashfield District Council Gypsy and Traveller Accommodation Assessment, RRR Consultancy Ltd, March, 2021
- 15.10 Greater Nottingham Blue and Green Infrastructure Strategy, Greater Nottingham Authorities, January, 2022
- 15.11 Greater Nottingham & Ashfield Housing Needs Assessment First Homes Update, Icen Projects, July, 2022
- 15.12 Nottinghamshire Core & Outer HMA Logistics Study, Icen Projects, July, 2022