

**Executive Board – 22<sup>nd</sup> October 2024**

<b>Subject:</b>	Greater Nottingham Strategic Plan - Publication Draft
<b>Corporate Director(s)/Director(s):</b>	Nicki Jenkins, Corporate Director for Growth and City Development
<b>Executive Member(s):</b>	Councillor Jay Hayes, Executive Member for Housing and Planning
<b>Report author and contact details:</b>	Karen Shaw/Matt Gregory Karen.shaw@nottinghamcity.gov.uk/matt.gregory@nottinghamcity.gov.uk
<b>Other colleagues who have provided input:</b>	n/a
<b>Subject to call-in:</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Key Decision:</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Criteria for Key Decision:</b>	
<b>(a)</b>	<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
<b>and/or</b>	
<b>(b)</b>	Significant impact on communities living or working in two or more wards in the City <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Type of expenditure:</b>	<input type="checkbox"/> Revenue <input type="checkbox"/> Capital If Capital, provide the date considered by Capital Board Date:
<b>Total value of the decision:</b>	Nil
<b>Section 151 Officer expenditure approval</b>	Has the spend been approved by the Section 151 Officer? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/a Spend Control Board approval reference number:
<b>Commissioner Consideration</b>	Has this report been shared with the Commissioners' Office? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Any comments the Commissioners wish to provide are listed below.
<b>Wards affected:</b>	All
<b>Date of consultation with Executive Member(s):</b>	16/09/24
<b>Relevant Council Plan Key Outcome:</b>	
Clean, Green and Connected Communities	<input checked="" type="checkbox"/>
Keeping Nottingham Working	<input type="checkbox"/>
Carbon Neutral by 2028	<input checked="" type="checkbox"/>
Safer Nottingham	<input type="checkbox"/>
Child-Friendly Nottingham	<input type="checkbox"/>
Living Well in Our Communities	<input checked="" type="checkbox"/>
Keeping Nottingham Moving	<input type="checkbox"/>
Improve the City Centre	<input checked="" type="checkbox"/>
Better Housing	<input checked="" type="checkbox"/>
Serving People Well	<input type="checkbox"/>
<b>Summary of issues (including benefits to citizens/service users):</b>	The Greater Nottingham Publication Draft Strategic Plan (Strategic Plan) has been prepared in partnership with Broxtowe, Gedling and Rushcliffe Borough Councils, and sets out a coherent and consistent strategic planning framework across the four local authority areas. The Strategic Plan sets a strategic planning framework for Nottingham City to 2041, including the broad scale and location of housing and economic growth over that period, together with supporting infrastructure and how environmental matters will be considered. The Strategic Plan will be part of the statutory Development Plan that all local planning authorities must prepare by law. The document is at the 'Publication' stage of the plan preparation process and is the first formal stage in the production of the document (i.e. Regulation 19); it follows several stages of informal consultation.
<b>Does this report contain any information that is exempt from publication?</b>	No

**Recommendation(s):**

- 1 That Executive Board approves the Publication Draft Greater Nottingham Strategic Plan for consultation in so far as it relates to Nottingham City, to allow a period of public representations.**
- 2 That authority is delegated to the Director of Planning and Transport 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.**

**1. Reasons for recommendations**

- 1.1 Production of a Local Plan is a statutory requirement. If no planning framework is in place, the government's default presumption in favour of sustainable development will apply to relevant planning applications.
- 1.2 It would be possible for Nottingham City Council to publish a separate Local Plan, without aligning with the surrounding District's Local Plans. However, the 'Duty to Cooperate' introduced through the Localism Bill requires councils to demonstrate at Examination that they have worked with neighbouring councils in addressing cross boundary planning matters, and by preparing a joint Strategic Plan, this duty is met. Furthermore, working with partner Councils in Greater Nottingham has resulted in significant cost savings, achieved through commissioning one consistent evidence base, and there will be one examination rather than four.

**2. Background (including outcomes of consultation)**

- 2.1 Planning legislation requires the City Council to produce a statutory development plan for its area. The Strategic Plan will be part of the development plan (along with the Nottinghamshire and Nottingham Waste Core Strategy, 2013 and the Land and Planning Policies Document, 2020). The Strategic Plan provides the strategic vision for development across Nottingham City and the three partner local authority areas until 2041.
- 2.2 Strategic policies for the Greater Nottingham area are currently set out in the adopted Aligned Core Strategies for the Greater Nottingham authorities (Broxtowe Borough, Gedling Borough and Nottingham City Councils, adopted in September 2014 and the Core Strategy for Rushcliffe Borough Council, adopted in December 2014).
- 2.3 The Aligned Core Strategy forms Part 1 of the Nottingham Local Plan, providing the strategic context for the Land and Planning Policies Document. It sets out the strategic policy direction for future development in the City 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.
- 2.4 Prior to its adoption, the Strategic Plan must go through a number of informal and formal consultation stages. Publication represents the first formal stage of preparation, and follows extensive informal consultation.

**Previous Consultation**

- 2.5 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.

- 2.6 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.
- 2.7 The two Preferred Approach consultations generated 1,027 responses from 237 individuals and organisations. Many comments were from developers promoting their own sites in the Borough areas, or commenting on the proposed housing targets, which were generally considered to be too low. For Nottingham City, responses from developers focussed on the City being unable to meet the housing need as derived from the Government's Standard Method calculation for housing need, and the fact that the Boroughs were not intending to provide for that unmet need. Several suggested that the City's housing supply was overstated, and therefore more housing should be provided in the Boroughs to compensate. In terms of the sites allocated in Nottingham City, most comments were informative rather than objections, but concerns were raised that poor viability could prevent the delivery of sites, notably Stanton Tip. A developer proposed an additional site in Green Belt north of Ruddington, partly within the Nottingham City boundary.
- 2.8 Following this, the Councils have been updating the Strategic Plan according to the consultation comments received and commissioning the evidence base upon which the Plan has been formulated. The Strategic Plan can be viewed at (Appendix 1), and all documentation associated with the consultation will be available at <https://www.gnplan.org.uk/>, and includes the Statement of Consultation (Appendix 6) which provides a comprehensive summary of consultation undertaken during the preparation of the Strategic Plan. The Statement of Consultation includes summaries of comments made by consultees at the two Preferred Approach consultations together with a response by the Councils.

### **Strategic Plan Content**

- 2.9 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 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 factors 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.
- 2.10 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.

2.11 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.

2.12 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.

2.13 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 applied a 35% uplift to its housing need, giving a figure of 33,210 which is significantly above the Nottingham City's estimated housing land supply.

2.14 However, the Government has recently (July 2024) published draft revisions to the NPPF and to the Standard Method for assessing local housing need. The new draft Standard Method uses an area's housing stock rather than 2014 household projections as its base, and does not include a 35% uplift for large urban areas. The changes to the NPPF, amongst other measures, 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.

2.15 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;”

2.16 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, given the imperative to provide new homes and the fit with the Council's growth ambitions. The

housing target for Greater Nottingham is 54,680. In order to comply with the NPPF transitional arrangements, the Borough Councils have increased their housing targets over the level set by the current 2023 standard method to fall within the 200 threshold of the transitional arrangements.

- 2.17 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 Nottingham City, the draft Strategic Plan promotes development at Boots, Stanton Tip and the Broad Marsh Area. All were previous allocations in the Land and Planning Policies Document.
- 2.18 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, 2021). It used a variety of scenarios to assess a range of employment space needs for both industrial/warehousing space and office floorspace.
- 2.19 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 Strategic 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. For office development, the opposite is the case, with Nottingham City providing for some of the office need attributed to the Borough Council areas.
- 2.20 The Nottinghamshire Core and Outer Housing Market Area Logistics Study, 2022 was commissioned to quantify the scale of strategic B8 logistics need across the Core/Outer Nottingham Housing Market Areas. The Strategic Plan allocates two sites, one in Rushcliffe Borough and one in Broxtowe Borough, to accommodate large scale logistics development.
- 2.21 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 they continue to be progressed nationally. The introduction of these standards will be challenging but is an important step in the Councils' drive towards net zero.
- 2.22 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. In Nottingham, it identifies the River Trent and the River Leen corridors as part of the primary strategic network.
- 2.23 Policy 19 sets out the Strategic Site Allocations for the Boots site, which is split between Nottingham City and Broxtowe Borough Council administrative areas. Policy 24 contains the Strategic Site Allocation for the Former Stanton Tip site and the Strategic Site Allocation for Broad Marsh is set out in Policy 25. Boots and Stanton Tip and Broad Marsh are all existing site allocations in

the currently adopted Local Plan Part 2 and so these existing policies will be superseded once the Greater Nottingham Strategic Plan is adopted. The site boundaries for Boots and Stanton Tip remain the same in the Strategic Plan, but the Broad Marsh boundary has been amended to take into account the demolition of the shopping centre. This boundary change will necessitate a change to the adopted Policies Map which accompanies the Local Plan Part 2. Details of this boundary change are set out in the Policies Map Amendment Document which can be found at Appendix 7.

2.24 Appendix 2 contains a brief summary of the Strategic Plan's policy content.

2.25 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 representations on the scope and content of the Strategic Plan policies.

2.26 The Sustainability Appraisal (Appendix 5) is a legal requirement of plan preparation. The Greater Nottingham Strategic Plan Sustainability Appraisal Report, 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.

2.27 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, the Strategic Plan, together with copies of the representations made, will be submitted for examination in early 2025.

### **3. Other options considered in making recommendations**

3.1 Production of a Local Plan is a statutory requirement. If no planning framework is in place, the government's default presumption in favour of sustainable development will apply to relevant planning applications. Not preparing a plan is therefore not considered to be a reasonable option.

3.2 An alternative option would be for Nottingham City Council to publish a separate Local Plan, without aligning with the surrounding District's Local Plans. However, the 'Duty to Cooperate' introduced through the Localism Bill requires councils to demonstrate at Examination that they have worked with neighbouring councils in addressing cross boundary planning matters, and by preparing a Strategic Plan, this duty is met. Furthermore, working with partner Councils in Greater Nottingham has resulted in significant cost savings, achieved through commissioning one consistent evidence base, and there will be one examination rather than four.

### **4. Consideration of Risk**

- 4.1 There is a risk that one or more partner councils will fail to agree to the publication of the Strategic Plan. In this event the remaining councils will have to determine whether or not to publish separate Local Plans. This would lead to a delay to publication, and any revised Local Plan would have to be prepared under the latest version of the NPPF, due to be published before the end of 2024.
- 4.2 The action is authorised by sections 17 and 28 of the Planning and Compulsory Purchase Act 2004.
5. **Best Value Considerations, including consideration of Make or Buy where appropriate**
- 5.1 The approach taken to prepare the Greater Nottingham Strategic Plan is considered to be a best practice example of securing Best Value. This is in terms of both sharing services and working in partnership with our neighbouring authorities, and also in sharing procurement in relation to jointly commissioning all of the evidence base studies, to underpin the policies in the Strategic Plan. This approach has saved significant staff and finance resources for the City Council and also for our partnering authorities.
6. **Commissioner comments**
- 6.1 Commissioners are content with the report
7. **Finance colleague comments (including implications and value for money/VAT)**
- 7.1 The production of a Local Plan is a statutory requirement for the Council. There are no direct financial implications from the consultation on the Publication Draft Greater Nottingham Strategic Plan and the work has been undertaken using current existing resources earmarked for this purpose and therefore is supported and places no pressure on the Medium Financial Term Plan. This will be monitored by the service for any variance and reflected in the monthly forecast for the service.

Paul Rogers, Commercial Finance Business Partner (Growth and City Development)  
16/09/2024

8. **Legal colleague comments**
- 8.1 As indicated in the main body of the report, there is a power to create and adopt joint local development documents with other councils and the formulation and adoption of Local Plan Documents has to follow a formal statutory process. That process appears to have been followed in relation to the Strategic Plan so far as this Council is concerned. Whilst not all functions relating to development plan documents and statutory plans are the sole responsibility of the Executive, the formulation and preparation of the Strategic Plan up to the submission stage is within the Executive's remit. As the Board is being asked to authorise release of the Publication Draft for consultation the risk of challenge at this stage is small.

Ann Barrett Team Leader, Legal Services

**9. Other relevant comments**

- 9.1 Property Services have been and continue to be consulted as appropriate throughout the preparation of the Strategic Plan. The document 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, 18<sup>th</sup> September 2024.

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

- 10.1 N/A

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

- 11.1 N/A

**12. Regard to the NHS Constitution (If Applicable)**

- 12.1 N/A

**13. Equality Impact Assessment (EIA)**

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

No

Yes

Attached as Appendix 3, and due regard has been given to implications identified in it.

**14. Data Protection Impact Assessment (DPIA)**

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

No

A DPIA is not required because this is a planning policy document and no personal data is included within its content.

Yes

**15. Carbon Impact Assessment (CIA)**

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

No

Yes

Attached as Appendix 4, and due regard has been given to implications identified in it.



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

16.1 N/A

**17. Published documents referred to in this report**

- Greater Nottingham Aligned Core Strategies, Greater Nottingham Authorities 2014 <https://www.nottinghamcity.gov.uk/information-for-business/planning-and-building-control/planning-policy/the-local-plan-and-planning-policy/>
- Land and planning Policies Document, Local Plan Part 2, Nottingham City Council, 2020 <https://www.nottinghamcity.gov.uk/information-for-business/planning-and-building-control/planning-policy/the-local-plan-and-planning-policy/>
- Nottingham and Nottinghamshire Joint Waste Core Strategy, 2013 <https://www.nottinghamcity.gov.uk/information-for-business/planning-and-building-control/planning-policy/the-local-plan-and-planning-policy/>
- Proposed Reforms to the National Planning Policy Framework and other changes to the Planning System, Ministry of Housing Communities and Local Government, 24 September 2024 <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>
- National Planning Policy Framework, Ministry of Housing, Communities and Local Government, December 2023 [https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF_December_2023.pdf)
- All further Background Papers and evidence base studies to support the Greater Nottingham Strategic Plan can be found at: <https://www.gnplan.org.uk/evidence-base/>