

#### Council

# Thursday, 6 March 2025

# **Greater Nottingham Strategic Plan**

# **Report of the Director – Development and Economic Growth**

# Cabinet Portfolio Holder for Planning and Housing, Councillor R Upton

# 1. Purpose of report

- 1.1. The purpose of the report is to consider a revised Publication Draft Greater Nottingham Strategic Plan (GNSP). This would replace the previous Publication Draft GNSP that was published in November 2024. The revised draft GNSP has been prepared due to revisions made to national policy requirements, which are included within the updated National Planning Policy Framework (NPPF) published on 12 December 2024, and the decision of Gedling Borough Council to withdraw from the partnership of local authorities preparing the GNSP.
- 1.2. If approved by Council, and there is equivalent approval by Broxtowe Borough and Nottingham City Councils, the revised draft Strategic Plan will be published for a six-week public representation period. The responses received, along with the draft Strategic Plan and all supporting documents, will then be submitted for public examination by a government appointed Planning Inspector or Inspectors.
- 1.3. Once adopted, the Strategic Plan will, for Rushcliffe Borough, replace the Rushcliffe Local Plan Part 1: Core Strategy that was adopted in 2014.

# 2. Recommendation

It is RECOMMENDED that Council:

- a) approves the withdrawal of the previous Regulation 19 Publication Draft of the Greater Nottingham Strategic Plan, which was published on 4 November 2024;
- b) approves the revised Regulation 19 Publication Draft Greater Nottingham Strategic Plan and revised Policies Map Changes document, in so far as they relate to Rushcliffe Borough, and agrees to their publication for a sixweek public representation period;
- c) agrees that, following the representation period, the revised Publication Draft Greater Nottingham Strategic Plan, revised Policies Map Changes document, all supporting documents and all representations received be submitted for public examination; and

d) delegates authority to the Director – Development and Economic Growth in consultation with the Cabinet Portfolio Holder for Planning and Housing to make any minor editing changes to the revised Publication Draft Greater Nottingham Strategic Plan prior to its publication.

#### 3. Reasons for Recommendation

- 3.1. To enable preparation of the GNSP to progress further and for it to be submitted for examination in public. The Strategic Plan is required to be examined by a Planning Inspector (or Inspectors) appointed by the Secretary of State for Housing, Communities and Local Government before it can be adopted as part of the statutory development plan.
- 3.2. Failure to review and replace the Local Plan Part 1: Core Strategy would eventually 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 Rushcliffe and could weaken the Council's ability to effectively deal with all planning applications.
- 3.3. The Publication Draft GNSP published on 4 November 2024 was prepared in accordance with the transitional arrangements for local plan preparation set out in the draft revised NPPF published by government in July 2024. The final updated NPPF was published on 12 December 2024 and includes different transitional arrangements for local plan preparation to those published in draft in July 2024. The outcome of which is that the draft GNSP is no longer able to proceed towards adoption without revisions first being made to its proposed housing targets. Furthermore, following the updated NPPF's publication, Gedling Borough Council has taken the decision (subject to committee approval) to withdraw from the GNSP preparation process.
- 3.4. A revised draft GNSP has therefore been prepared to satisfy the latest NPPF transitional arrangements and to deal with Gedling Borough Council's decision. The associated revisions to the plan were considered at the Council's crossparty Local Development Framework Group (LDF) meeting on 18 February 2025, at which they were unanimously supported.

### 4. Supporting Information

- 4.1. The draft Greater Nottingham Strategic Plan (GNSP) was approved at the Council meeting on 26 September 2024, and then separately by Broxtowe Borough, Gedling Borough and Nottingham City Councils. Following which, the Strategic Plan was published on 4 November 2024, for a six-week public representation period (the 'Regulation 19' stage), which finished on 16 December 2024.
- 4.2. At the time the draft Strategic Plan was approved and then published, it was in accordance with the transitional arrangements for local plan preparation set out in the draft revised National Planning Policy Framework (NPPF) published by Government in July 2024. These transitional arrangements allowed the GNSP to proceed towards adoption provided each council's annualised housing target

was no more than 200 dwellings below its annual housing need figure. A new 'standard method' for calculating housing need had also been published in draft by government at the same time.

- 4.3. The final updated NPPF was published on 12 December 2024 and includes different transitional arrangements for local plan preparation to those published in draft in July 2024. The consequence of which is that the GNSP is no longer able to proceed towards adoption without revisions first being made to the proposed housing targets. This is because each authority's annual housing target must now meet at least 80% of annual housing need, rather than the previous draft requirement that annual housing targets should be no more than 200 dwellings below annual housing need.
- 4.4. The draft housing targets of Broxtowe, Gedling and Rushcliffe included in the draft Strategic Plan, November 2024, all fall below 80% of housing need (Rushcliffe's at 76%, Broxtowe's at 74% and Gedling's at 76%), and therefore will all need to increase. The housing target for Nottingham City does not need to change as it exceeds the authority's housing need (at 119%). These calculations are based on an updated methodology for calculating housing need, which was published alongside the updated NPPF in December 2024.
- 4.5. The NPPF transitional arrangements also require that a revised Strategic Plan with updated housing targets (to meet at least 80% of housing need) would need to be published on or before 12 March 2025. This is published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012; with there being at least a six-week period for residents and others to submit representations on the draft plan. If the 12 March 2025 deadline is not met, then a substantially revised or new local plan that provides for 100% of housing needs would be required to be prepared instead.
- 4.6. Following publication of the updated NPPF in December 2024, Gedling Borough Council has taken the decision (subject to committee approval) to withdraw from the partnership of local authorities preparing the GNSP. It is considered feasible and appropriate for the remaining three authorities to proceed with preparation of the Strategic Plan without Gedling.
- 4.7. As set out in Table 1 below, Rushcliffe's housing target would need to increase by 600 homes over the plan period (2023 to 2041), and Broxtowe's by 700 homes, in order for both councils to meet at least 80% of housing need. Therefore, it is proposed that Rushcliffe's housing target within the GNSP goes up from 11,360 homes to 11,960 homes over the plan period.

Table 1: Proposed revised GNSP housing targets

	Α	В	С	D	Е
	Housing target 2023 to 2041 in draft GNSP, Nov 2024	December 2024 standard method housing need (2023 to 2041)	Proposed revised housing target 2023 to 2041	Increase to housing target (C-A)	Proposed revised housing target as a percentage of housing need
Broxtowe	8,250	11,175	8,950	700	80%
Nottingham City	26,690	22,451	26,690	0	119%
Rushcliffe	11,360	14,946	11,960	600	80%
Strategic Plan area	46,300	48,572	47,600	1,300	98%

- 4.8. The effect for both Rushcliffe and Broxtowe of these housing target increases would be to reduce the degree to which housing land supply exceeds the targets over the plan period. As set out in Table 2 below, for Rushcliffe, existing supply (14,144 homes) would now exceed the proposed housing target (11,960 homes) by around 2,200. This would still provide sufficient protection against any potential future housing undersupply should the delivery of one or more of the larger strategic allocations either stall or if the rate of housing delivery on site falls significantly below expected levels. For Strategic Plan preparation, there would remain no need to allocate any new housing land in Rushcliffe within the plan.
- 4.9. It should be noted that if Rushcliffe's housing target over the plan period was to be set to meet 100% of housing need (14,946 homes), it would exceed existing housing land supply (14,144 homes) and additional housing land would need to be allocated as part of a substantially revised GNSP or entirely new draft local plan. This would require plan preparation to go back one or more stages.

Table 2: Proposed housing targets versus existing housing land supply

	Α	В	С
	Proposed revised housing target 2023-2041	Current Estimated Housing Supply 2023-2041*	Difference (B-A)
Broxtowe	8,950	9,861	911
Nottingham City	26,690	26,686	-4
Rushcliffe	11,960	14,144	2,184
Strategic Plan area	47,600	50,691	3,091

<sup>\*</sup> Current estimated supply (for example, sites with planning permission or already included in adopted Local Plans).

# **Proposed Revisions to the Draft Strategic Plan**

- 4.10. In light of the above, proposed revisions have been made to the draft Strategic Plan. The main changes are:
  - Policy 3 (Housing Targets) to increase Broxtowe and Rushcliffe's housing targets and to remove Gedling's housing target and its proposed housing allocations;
  - Policy 4 (Employment Provision and Economic Development) to update employment land requirements without Gedling's inclusion;
  - Policy 7 (Role of Town and Other Centres) to remove reference to Gedling's centres;
  - Policy 8 (Housing Size, Mix and Choice) to remove requirements related to Gedling; and
  - Policy 24 (Strategic Allocation for Top Wighay Farm), which is a Gedling specific policy, is deleted.
- 4.11. There are more minor amendments to several other policies, and other parts of the draft Strategic Plan are either amended or deleted, as a consequence of Gedling's decision for example, the deletion of Gedling's housing trajectory at Appendix C of the Strategic Plan.
- 4.12. It is also proposed, following further review, that some limited changes are made to Policy 31 (Strategic Allocation East of Gamston / North of Tollerton) and its justification text to provide greater clarity in respect of expectations for infrastructure delivery on the site.
- 4.13. Aside from the above changes and other minor consequential changes or corrections, the draft Strategic Plan remains unaltered from the version approved at the Council meeting on 26 September 2024.
- 4.14. The proposed revised Publication Draft GNSP is at Appendix 1. For illustrative purposes, a 'track change' version of the draft Strategic Plan, which highlights the proposed changes, is available to view at <a href="https://www.gnplan.org.uk/evidence-base">www.gnplan.org.uk/evidence-base</a>.
- 4.15. The Policies Map Changes document (Appendix 2) also remains unaltered from the version approved at the Council meeting on 26 September 2024, apart from the removal of those changes relating to Gedling.

#### **Sustainability Appraisal and Supporting Evidence**

- 4.16. The drafting of the Strategic Plan to its present stage has been fully informed by Sustainability Appraisal outcomes, other supporting evidence and the consultation feedback received by the Councils during the various stages of community engagement undertaken.
- 4.17. The Sustainability Appraisal is a legal requirement of plan preparation, and a Sustainability Appraisal Report for the Strategic Plan has been prepared to fulfil this requirement. The Sustainability Appraisal has assessed the environmental, economic and social impacts of the various policies and proposals included in

the draft Strategic Plan and the alternatives considered. It has been revised to take account of additional reasonable alternative options for the housing targets that have been added due to the NPPF transitional arrangements. A revised Sustainability Appraisal Report Non-Technical Summary is at Appendix 3 to this report and the other documents that make up the Sustainability Appraisal are available as background papers.

4.18. The other supporting evidence prepared for the Strategic Plan generally remains unaltered from that prepared in support of the previous Publication Draft GNSP. It is available to view at the Greater Nottingham Planning Partnership website: www.gnplan.org.uk/evidence-base.

# **Timetable**

- 4.19. Broxtowe Borough Council is due to take a decision on the draft revised plan on 11 March 2025 and Nottingham City is due to also by that date. Subject to approval by all three councils, the revised GNSP will be published in accordance with Regulation 19 on 12 March 2025, for at least a six-weeks' representation period.
- 4.20. The revised timetable for the Strategic Plan's preparation, which has been included in an updated Rushcliffe Local Development Scheme, is:
  - Publication (Regulation 19) of revised draft GNSP 12 March 2025
  - Submission for public examination September 2025
  - Examination, including public hearings October 2025
  - Receipt of Inspector's Report August 2026
  - Adoption September 2026

# 5. Alternative options considered and reasons for rejection

- 5.1 The production of a local plan is a statutory duty. 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 because significant cost savings are achieved in preparing a joint document covering more strategic matters. It will also ensure a consistent and coherent planning policy approach across the wider area.
- 5.2 In preparing the Strategic Plan all reasonable alternatives have been assessed through the sustainability appraisal and site selection work.

#### 6. Risks and Uncertainties

- 6.1. Failure to review and replace the Local Plan Part 1: Core Strategy would eventually 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 Rushcliffe and could weaken the Council's ability to effectively deal with all planning applications.
- 6.2. The Levelling-up and Regeneration Act (2023) allows the Government to set deadlines for submitting development plans under the current system. Any

delay to the Greater Nottingham Strategic Plan timetable would risk the plan missing set deadlines and not being able to progress as it is.

6.3. The updated NPPF, published 12 December 2024, includes a transitional period which allows the GNSP to proceed with only limited further delays provided each authority's housing target meets at least 80% of its housing need, and that a revised draft GNSP including these updated targets is published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on or before 12 March 2025. If this deadline is not met, then there would be a requirement for the local plan to be more comprehensively revised to meet 100% of Rushcliffe's housing need. This would require plan preparation to return to an earlier preparatory stage, in order to allow additional land to be identified for housing development, and the Council would therefore be without an up to date plan for longer. It is important that the Strategic Plan keeps to schedule to minimise this risk.

# 7. Implications

# 7.1. Financial Implications

At present, the workload required in undertaking preparation of the GNSP, in terms of the Borough Council working jointly with partner councils, will be undertaken utilising existing Planning Policy resources. Any additional resources that might be required as the review progresses will need to be considered as part of the Council's budget review processes.

# 7.2. Legal Implications

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. Further information on new regulations relating to the local plan preparation process are expected during 2025.

# 7.3. Equalities Implications

An Equalities Impact Assessment has been prepared (available as a background document) for the Greater Nottingham Strategic Plan and its outcomes have been used to inform the Plan's policies and proposals.

# 7.4. Section 17 of the Crime and Disorder Act 1998 Implications

There are no crime and disorder implications associated with this report.

# 7.5. **Biodiversity Net Gain Implications**

Local plans can introduce a requirement for greater than 10% Biodiversity Net Gain on an area-wide basis or for specific allocations for development if

justified. Planning practice guidance sets out that justification would need to be based on evidence including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. The draft GNSP includes the proposal to increase the requirement for biodiversity net gain to a minimum of 20% within Rushcliffe Borough. Consideration will need to be given to how the policy will be implemented.

# 8. Link to Corporate Priorities

The Environment	The Strategic Plan establishes a strategic framework for ensuring that new development respects and, where possible, enhances Rushcliffe's environment.
Quality of Life	The Strategic Plan is underpinned by policies and proposals that aim to maintain the quality of life for both existing and new Rushcliffe residents.
Efficient Services	The provision of efficient services includes ongoing appraisal and alignment of resources to growth aspirations. The Strategic Plan will include policies and proposals to achieve development that is supported by adequate infrastructure.
Sustainable Growth	The Government views the primary purpose of the planning system as contributing to the achievement of development, including the provision of new homes, new commercial development, and supporting infrastructure in a sustainable manner. The Strategic Plan will play a vital role in achieving sustainable growth locally.

#### 9. Recommendation

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- c) agrees that, following the representation period, the revised Publication Draft Greater Nottingham Strategic Plan, revised Policies Map Changes document, all supporting documents and all representations received be submitted for public examination; and
- d) delegates authority to the Director Development and Economic Growth in consultation with the Cabinet Portfolio Holder for Planning and Housing to make any minor editing changes to the revised Publication Draft Greater Nottingham Strategic Plan prior to its publication.

For more	information
contact:	

Richard Mapletoft Planning Policy Manager 0115 914 8457 rmapletoft@rushcliffe.gov.uk

# Background papers available for Inspection:

The following evidence and background documents have been updated for the revised Publication Draft GNSP.

- Sustainability Appraisal Main Report, Non-Technical Summary and Appendix D, March 2025
- 2. Housing Background Paper, March 2025
- 3. Employment Background Paper, March 2025

These and all other existing evidence and supporting documents are available to view at: www.gnplan.org.uk/evidence-base

A track change version of the revised Publication Draft Greater Nottingham Strategic Plan, March 2025 is available at: www.gnplan.org.uk/evidence-base

#### **Previous consultation documents**

- Greater Nottingham Strategic Plan Growth Options consultation, July 2020:
   www.gnplan.org.uk/media/2asfxrdu/greater-nottinghamstrategic-plan-growth-options-web-version.pdf
- Greater Nottingham Strategic Plan Preferred Approach Consultation, January 2023:
   www.gnplan.org.uk/media/o2knkbif/preferred-approachdocument.pdf
- Greater Nottingham Strategic Plan Strategic Distribution and Logistics: Preferred Approach Consultation, September 2023:
   www.gnplan.org.uk/media/ujvflvnl/indesign-preferredapproach-logistics-consultation-approved-v2.pdf
- Public Draft Greater Nottingham Strategic Plan, November 2024
   <a href="https://www.gnplan.org.uk/consultations/publication-draft-consultation-regulation-19/">https://www.gnplan.org.uk/consultations/publication-draft-consultation-regulation-19/</a>

# Previous consultation summaries and response documents

 Report of Consultation Responses: Growth Options, February 2022
 www.gnplan.org.uk/media/mnco0kmt/report-ofconsultation-responses-growth-options.pdf

	<ul> <li>Preferred Approach: Response to the Growth Options Consultation, December 2022:         <ul> <li>www.gnplan.org.uk/media/w25l02xx/preferred-approach-response-to-the-growth-options-consultation.pdf</li> </ul> </li> <li>Strategic Housing Land Availability Assessment         <ul> <li>Rushcliffe Borough Council Strategic Housing Land Availability Assessment Report 2023, December 2023:</li></ul></li></ul>
List of appendices:	Appendix 1: Revised Publication Draft Greater Nottingham Strategic Plan, March 2025
	Appendix 2: Revised Draft Greater Nottingham Strategic Plan Policies Map Changes. March 2025
	Appendix 3: Sustainability Appraisal Report for the Greater Nottingham Strategic Plan, Non-Technical Summary, March 2025