

Joint Committee on Strategic Planning and Transport

Friday, 10 March 2023 at 10:30

County Hall, West Bridgford, Nottingham, NG2 7QP

AGENDA

- | | | |
|---|--|---------|
| 1 | Minutes 09 December 2022 | 3 - 6 |
| 2 | Apologies for Absence | |
| 3 | Declarations of Interests by Members and Officers:- (see note below)
(a) Disclosable Pecuniary Interests
(b) Private Interests (pecuniary and non-pecuniary) | |
| 4 | Government Consultation on Reforms to National Planning Policy | 7 - 36 |
| 5 | Nottinghamshire and Nottingham Waste Local Plan | 37 - 38 |
| 6 | Transport Update | 39 - 42 |
| 7 | Greater Nottingham Joint Planning Advisory Board Update | 43 - 56 |
| 8 | Joint Committee Work Programme | 57 - 62 |

Notes

- (1) Councillors are advised to contact their Research Officer for details of any

Group Meetings which are planned for this meeting.

- (2) Members of the public wishing to inspect "Background Papers" referred to in the reports on the agenda or Schedule 12A of the Local Government Act should contact:-

Customer Services Centre 0300 500 80 80

- (3) Persons making a declaration of interest should have regard to the Code of Conduct and the Council's Procedure Rules. Those declaring must indicate the nature of their interest and the reasons for the declaration.

Councillors or Officers requiring clarification on whether to make a declaration of interest are invited to contact Sarah Ashton (Tel. 0115 977 3962) or a colleague in Democratic Services prior to the meeting.

- (4) Councillors are reminded that Committee and Sub-Committee papers, with the exception of those which contain Exempt or Confidential Information, may be recycled.
- (5) This agenda and its associated reports are available to view online via an online calendar - <http://www.nottinghamshire.gov.uk/dms/Meetings.aspx>



Joint Committee on Strategic Planning and Transport

Minutes of the meeting held at County Hall on 9 December 2022 from 10.30 am to 11.55 am

Membership

Present

Councillor Neil Clarke MBE (Chair)
Councillor Pavlos Kotsonis (Vice Chair)
Councillor Steve Carr
Councillor Jim Creamer
Councillor Michael Edwards
Councillor Rosemary Healy
Councillor John Ogle

Absent

Councillor Audra Wynter

Colleagues, partners, and others in attendance:

Sarah Ashton - Democratic Services Officer, Nottinghamshire County Council
Matt Gregory - Head of Planning Strategy and Geographic Information, Nottingham City Council

Stephen Pointer - Team Manager, Planning Policy, Nottinghamshire County Council

Kevin Sharman - Team Manager, Transport, Nottinghamshire County Council
Tim Bellenger - Transport Strategy Manager, Nottingham City Council

1. Minutes of last meeting 11 March 2022

The minutes of the last meeting on 11 March 2022, having been previously circulated, were confirmed and signed by the Chairman.

2. Apologies for absence

An apology was received from Councillor Audra Wynter (holiday)

3. Declarations of interest by Members and Officers

None

4. Joint Committee Terms of Reference

Stephen Pointer, Team Manager Planning Policy, Nottinghamshire County Council, presented the report informing Members of the terms of reference for the Committee. No actual amendments have been made, but it is required that the Committee reviews the terms of reference at least every two years

Members discussed the likely amendments in the Levelling Up Bill and anticipated legislation resulting from this they thought removing the sentence at the end of paragraph 3 would give the Committee more flexibility

RESOLVED: 2022/39

That:

- 1) the Joint Committee's requested the removal of 'and to assist in meeting the Duty to Cooperate (S110 of the Localism Act)' from the end of paragraph 3
- 2) following the above change the amended Terms of Reference be approved

5. Nottinghamshire and Nottingham Waste Local Plan

Stephen Pointer, Team Manager Planning Policy, Nottinghamshire County Council, presented the report informing the Committee of progress with preparing the Nottinghamshire and Nottingham Waste Local Plan

The following points were raised during the discussion which followed:

- (a) concerns that the packaging sizes at Amazon is limited, need to encourage them to add further sizing options and send 'how to recycle packaging' information to customers as we are committed to be carbon neutral by 2030
- (b) need to be driving the reduction of food waste before it becomes a legal requirement for Authorities, unfortunately no extra money is expected from central Government to do this. The Committee would be interested to see the anaerobic digestors working at the Colwick plant
- (c) that the energy generated by the incineration plants need to be reused to heat homes
- (d) Companies very rarely recycle; we need to be educating them making them more aware of how they can be more effective
- (e) Committee would like to visit Enva recycling and resource recovery facility at Colwick

RESOLVED: 2022/40

That:

- 1) the progress on the production of the Waste Local Plan be noted

- 2) a letter be sent to Amazon on behalf of both Councils to thank them for the visit and set out ways in which Amazon might assist waste authorities by reducing the level of packaging and how they could encourage customers to recycle all packaging received
- 3) Officers to explore possible site visits to ENVA and Colwick Plant

6. Transport Update

Tim Bellenger, Transport Strategy Manager, Nottingham City Council and Kevin Sharman, Team Manager, Transport, Nottinghamshire County Council presented the transport update to the Committee

The following points were raised during the discussion which followed:

- (a) concerns were raised that the bus services were being reduced
- (b) Concerns that there is still heavy traffic at Arnold Lane, people are still using this route rather than the Gedling access Road

RESOLVED: 2022/41

That the Transport update be noted

7. Greater Nottingham Joint Planning Advisory Board Update

Matt Gregory, Head of Planning Strategy and Geographic Information, Nottingham City Council, updated the Committee on the Greater Nottingham Joint Planning Advisory Board (JPAD):

Matt had hoped to have been able to inform Members that the consultation for the 'Preferred Approach' would beginning on 12th December, but due to the Ministerial statement which indicates more flexibility around Council housing numbers and protection of green belts Gedling Borough have revised the plans for their area and as a result of that it is intended to begin the consultation on 3rd January for a 6 week period

The following points were raised during the discussion which followed:

- (a) people want to live in Nottingham, but private housing is limited as landlords are buying them up for student housing
- (b) concerns conveyed regarding the provision of housing in the City, the construction industry is more concerned in building student accommodation as it is more profitable
- (c) the shortage of City housing is spilling over into the Beeston area. Broxtowe are building a 100 council houses

RESOLVED: 2022/42

That the contents of the report be noted

8. Joint Committee Work Plan

Stephen Pointer, Team Manager Planning Policy, Nottinghamshire County Council, asked Members if there were any topics they wanted to be covered in the Committee?

The following suggestions were made:

- Mineral Plan update
- Update on the level of need for sand and gravel
- Strategic Council Plan
- HS2 development into the city
- Battery technology
- Sustainable practices

RESOLVED: 2022/43

That:

- 1) the Committee's Joint Work Programme be noted, and the above-mentioned topics be considered as future items for discussion within the Committee
- 2) the Committee didn't identify any partnership work areas at this time

The meeting closed at 11:55 am

CHAIRMAN

Meeting:	Joint Committee on Strategic Planning and Transport
Date:	10 March 2023
From:	Joint Officer Steering Group

Government Consultation on Reforms to National Planning Policy

1 Summary

- 1.1 To update the Committee on the Government's recent consultation on reforms to national planning policy.

2 Background

- 2.1 The Government is consulting on potential reforms to national planning policy, involving proposed changes to the National Planning Policy Framework (NPPF). The Government states that it is "also seeking views on our proposed approach to preparing National Development Management Policies, how we might develop policy to support levelling up, and how national planning policy is currently accessed by users". The Government also states that a "fuller review of the framework will be required in due course, and its content will depend on the implementation of the government's proposals for wider changes to the planning system, including the Levelling-up and Regeneration Bill".
- 2.2 As well as National Development Management Policies, subjects referred to in the consultation include: housing need and green belt boundaries; the tests of 'soundness' for Local Plans; the 'uplift' to housing requirements for large cities such as Nottingham; the 'Duty to Co-operate'; five-year housing land supply; the use of 'buffers' in housing land supply calculations; the Housing Delivery Test; 'irresponsible planning behaviour' by applicants; onshore wind; Supplementary Planning Documents; and 'social rent' homes.
- 2.3 A fuller summary of the consultation is included at Appendix 1 of this report. The consultation document itself is available at: <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy> and the proposed changes to the NPPF are at: [National Planning Policy Framework: draft text for consultation \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/national-planning-policy-framework-draft-text-for-consultation).
- 2.4 Both Councils have responded to the consultation. The responses are at Appendix 2 (Nottinghamshire County Council) and Appendix 3 (Nottingham City Council). Nottingham City Council's response was appended in draft, prior to submission, and is therefore subject to change.

3 Recommendation(s)

3.1 It is recommended that the Joint Committee note the contents of this report.

4 Background papers referred to in compiling this report

4.1 Levelling-up and Regeneration Bill: reforms to national planning policy, Dec 2022

4.2 National Planning Policy Framework Showing indicative changes for consultation, Dec 2022

Contact Officer

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APPENDIX 1 - summary of the consultation

Background

The Levelling Up and Regeneration Bill is currently before Parliament. The Bill makes a number of changes to existing local government, planning, and compulsory purchase legislation.

Alongside the proposals in the Bill, on 22 December 2022 the government launched a consultation on reforms to national planning policy. This Briefing Note focuses on this consultation and the changes proposed.

The consultation closed on 2 March 2023.

Extent of the Consultation

The consultation includes:

1. Specific changes that are proposed to be made immediately to the National Planning Policy Framework (NPPF). These are set out in a tracked changes document. The government has indicated that they intend to introduce these changes by spring 2023.
2. Alongside these specific changes, the consultation seeks views on a wider range of proposals which will be considered in the context of a wider review of the National Planning Policy Framework and will follow Royal Assent of the Levelling Up and Regeneration Bill. The government will consult on the detail of these wider changes next year, reflecting responses to this consultation.
3. The consultation sets out the envisaged role for National Development Management Policies (NDMPs) and asks for views on how NDMPs are implemented. The government states they will consult on the detail later.

1. Changes proposed to the NPPF (Spring 2023)

- Local authorities will be expected to continue to use local housing need, assessed through the standard method, to inform the preparation of their plans; although the ability to use an alternative approach where there are exceptional circumstances that can be justified will be retained. The government states that it will make clearer in the NPPF that the outcome of the standard method is an advisory starting-point to inform plan-making and proposes to give more explicit indications in planning guidance of the types of local characteristics which may justify the use of an alternative method.
- Housing need would not need to be met in full if it would mean building at densities significantly out of character with the existing area or if there is clear evidence of past over-delivery.
- There would not be a requirement to review and alter Green Belt boundaries if this would be the only means of meeting the objectively assessed need for housing over the plan period.

- Plans would not be required to be ‘justified’. Instead, the examination would assess whether the local planning authority’s proposed target meets need so far as possible, takes into account other policies in the Framework, and will be effective and deliverable.
- The government intends to retain the uplift of 35 per cent to the assessed housing need for the 20 largest towns and cities in England (which includes Nottingham). The draft NPPF revisions would require that this uplift is, “so far as possible”, met by the towns and cities concerned rather than exported to surrounding areas, except where there is voluntary cross-boundary agreement to do so.
- Councils would no longer have to apply buffers to the five-year housing land supply.
- Additional references to building ‘beautiful’ places and recognition that mansard roofs are an appropriate form of upward extension.
- Changes to enable the re-powering of renewable and low carbon energy (replacing old wind turbines with newer models), provided that the impacts of any development proposal are or can be made acceptable in planning terms.
- Additional text to state that significant weight should be given to the need to support energy efficiency improvements through the adaptation of existing buildings, particularly large non-domestic buildings.
- The government is considering suspension or amendment of the usual consequences of failure of the 2022 Housing Delivery Test.

2. Proposed Future Changes to National Policy (Expected 2024)

- The government says it will review the implications for the standard method of new household projections data based on the 2021 Census, which is due to be published in 2024. But it is not proposing any changes to the standard method formula itself through this consultation.
- The duty to co-operate is to be replaced with an “alignment policy”. The duty will remain in place until those provisions come into effect. Further consultation on what should constitute the alignment policy will be undertaken.
- For the purposes of decision making, where emerging local plans have been submitted for examination or where they have been subject to a Regulation 18 or 19 consultation which included both a policies map and proposed allocations towards meeting housing need, those authorities will benefit from only having to demonstrate a four-year supply of land for housing, instead of the usual five.
- Past “irresponsible planning behaviour” by applicants could be taken into account when applications are being determined. Primary legislation would be needed to enact such measures.
- Government data will be published on developers of sites over a certain size who fail to build out according to their commitments. Delivery will also become a material consideration in planning applications.
- Developers will be required to explain how they propose to increase the diversity of housing tenures to maximise a development scheme’s absorption rate (which is the rate at which homes are sold or occupied).

- A financial penalty for developers that are building out too slowly will be consulted on separately.
- There will be a review of the current degradation provisions for Biodiversity Net Gain “to reduce the risk of habitat clearances prior to the submission of planning applications, and before the creation of off-site biodiversity enhancements”. The government will also consider how “the threat to wildlife created by the use of artificial grass by developers in new development” can be halted.
- Views are sought on effective and proportionate ways of deploying a broad carbon assessment of new developments, including what they should measure, what evidence could underpin them such as Local Area Energy Plans, and how they may be used in a plan-making context or as a tool for assessing individual developments.
- Policy and guidance in relation to the production of Strategic Flood Risk Assessments will be reviewed.

3. National Development Management Policies (NDMPs)

- These would be given the same weight in certain planning decisions as policies in local plans, neighbourhood plans and other statutory plans. They would cover planning considerations that apply regularly in decision-making such as general policies for conserving heritage assets, and preventing inappropriate development in the Green Belt and areas of high flood risk.
- The government states that the existing National Planning Policy Framework already contains development management policies of this type that can be significant ‘material considerations’ but these do not have any statutory status. The NDMPs would include these as policies and would also cover other national priorities, “for example net zero policies that it would be difficult to develop evidence to support at a district level, but which are nationally important.”
- The intention is that National Development Management Policies, once introduced, would be set out in a separate document to the rest of the National Planning Policy Framework. The latter would be re-focused on principles for plan-making.
- Further consultation will follow on proposals for the draft National Development Management Policies following passage of the Bill.

4. Transition Arrangements

- Councils will have until 30 June 2025 to submit plans (local plans, neighbourhood plans, minerals and waste plans or spatial development strategies/joint strategic plans), for independent examination under the existing legal framework. This will mean that existing legal requirements and duties, for example the Duty to Cooperate, will still apply. Plans must then be adopted by 31 December 2026.
- Under the reformed system, which is expected to go live in late 2024, there will be a requirement for local planning authorities to start work on new plans by, at the latest, 5 years after adoption of their previous plan, and to adopt that new plan within 30 months. Authorities that have prepared a local plan

which is less than 5 years old when the new system goes live will not be required to begin preparing a new-style plan until their existing plan is 5 years old.

- In the reformed planning system, authorities will no longer be able to prepare supplementary planning documents (SPDs). Instead, they will be able to prepare Supplementary Plans, which will be afforded the same weight as a local plan or minerals and waste plan. When the new system comes into force (expected late 2024), existing SPDs will remain in force for a time-bound period, until the local planning authority is required to adopt a new-style plan. Current SPDs will automatically cease to have effect at the point at which authorities are required to have a new-style plan in place.

Appendix 2 Nottinghamshire County Council response

LURB: Reforms to National Planning Policy Consultation (Deadline 2nd March 2023)

Nottinghamshire County Council Planning Response

	Question	Response
1	Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?	This would seem an appropriate way to incentivise plan-making and minimise speculative development, which provides certainty to infrastructure providers such as County Councils regarding the location of new development. LPAs should still be required to calculate and monitor their housing trajectory, as this informs infrastructure planning.
2	Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?	No comments.
3	Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?	This seems fair and reasonable and is supported.
4	What should any planning guidance dealing with oversupply and undersupply say?	No comments.
5	Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?	This would seem an appropriate way to incentivise neighbourhood plan-making and minimise speculative development in those areas. This helps to ensure that infrastructure can be effectively planned and delivered.
6	Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?	Yes, the Council supports reference to 'supporting infrastructure' in Chapter 2 in particular. Planning for infrastructure is of central importance to the planning system and should be treated as such in the NPPF.
7	What are your views on the implications these changes may have on plan-making and housing supply?	The proposed changes may encourage authorities to bring forward plans where assessed housing need cannot be met, but clarity is needed regarding the circumstances under which this would be acceptable.
8	Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?	Yes, further clarity is needed on what would constitute an exceptional circumstance.

9	Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?	It is fair and appropriate that past over-supply should be taken into account when considering the housing need. Although building density should broadly remain in-character with the existing area, it should be noted that higher density development can support infrastructure delivery and so a balance needs to be met between retaining existing character and ensuring that there is sufficient land allocated to enable developments which are sustainable.
10	Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?	No comments.
11	Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?	This proposal will not reduce the amount of evidence which the Council is required to produce during plan-making, as it will still be necessary to have a strong evidence base to inform and explain the plan. This approach could lead to a departure away from objective and reasoned plan-making thereby increasing challenges at examination.
12	Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?	Agree; plan preparatory work in train should not be jeopardised or disrupted.
13	Do you agree that we should make a change to the Framework on the application of the urban uplift?	Further information on the rationale for applying the uplift of 35% would be helpful if the NPPF is to be amended. The administrative boundaries of City Authorities are not necessarily reflective of the capacity of the entire urban area and consideration as to how this uplift will impact on neighbouring authorities is necessary, given that issues such as transport are shared.
14	What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?	See response to Q13
15	How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?	See response to Q13

16	Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?	No comments
17	Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?	No comments
18	Do you support adding an additional permissions-based test that will 'switch off' the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?	This is supported as this would provide greater certainty to infrastructure providers about the quantity and location of development (i.e., by limiting speculative development). It is agreed that the planning authority should not be penalised for declines in economic conditions or developer actions which it cannot control.
19	Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?	No comments
20	Do you have views on a robust method for counting deliverable homes permitted for these purposes?	No comments
21	What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?	No comments
22	Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?	This is supported; securing homes for social rent is already a priority for many LPAs as well as the County Council as the Public Health Authority and it would be helpful if this were to be recognised in national policy. Prioritising delivery of affordable housing, including those for the Social Rent tenure can be positive as affordability and security of housing is a determinant of people's mental and physical health. There is a need to ensure that delivery of this tenure, other affordable housing tenures and all housing is high quality, healthy, sustainable and meet people's quality of life needs, now and in the future.
23	Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?	This is supported; securing homes for older people is a priority for the County Council in its capacity as a social care provider and this may help increase supply. Research has shown the planning system has consistently failed to plan for and build sufficient and appropriate housing

		for older people. We need to ensure we are committing to the outcomes of the Mayhew Review, that looks to future proofing retirement living, in our ever-ageing population. A fixed percentage of housing to be directed towards older person living could be considered.
24	Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?	No comments
25	How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?	There is a need to consider whether small sites can have adverse effect on health outcomes in terms of mental wellbeing and quality of life. Small sites, located in rural areas, such as across Nottinghamshire, may not be suitable for new housing the lack of access to key services, public transport and other key health factors can leave such sites unhealthy and unsustainable.
26	Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?	No comments
27	Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?	No comments
28	Is there anything else that you think would help community groups in delivering affordable housing on exception sites?	No comments
29	Is there anything else national planning policy could do to support community-led developments?	No comments
30	Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?	The logic of this proposal is appreciated; however, the deliverability is questioned. Planning applications are required to be judged on their own merit and this proposal would appear to be contrary to that approach. Also, planning permissions run with the land not the applicant and so sites can be sold on; this principle undermines the effect of this proposal.
31	Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?	It is considered that option one (i.e., to make behaviour a material consideration) would be preferable but the practicalities of this are questioned (see above). In either event, more guidance would be needed setting out what

		'irresponsible behaviour' amounts to so that a LPA has a clear and transparent mechanism by which to consider this matter.
32	Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?	The proposed measures to increase deliverability are supported by the County Council as the Minerals Planning Authority. Deliverability could also extend to the supply of minerals needed to boost construction. However, it would not be reasonable for the planning system to require a rate of output to be maintained over the life of a quarry as this would be an economic demand factor.
33	Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?	This is not supported in relation to minerals and waste development. Whilst such development should be well-designed, they are industrial in nature and could rarely be considered as beautiful. Emphasising the role of beauty could complicate planning applications for minerals/waste development. From a public health perspective, consideration should be given as to whether determinants of health can be included in the definition of beauty and placemaking in the NPPF. Taking account of health outcomes in developing local design codes can be a good foundation for creating healthier places and communities.
34	Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places', to further encourage well-designed and beautiful development?	See response to Q33
35	Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?	Yes, visual clarity on design requirements would prevent developers from weakening their commitments post planning permission (though developers may still come forward with applications to vary conditions).
36	Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?	No comments
37	How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?	Yes, emphasis on biodiversity enhancement through design is supported and it is agreed that natural materials are generally preferable.

38	Do you agree that this is the right approach to making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?	The principle is supported but the effect may be limited.
39	What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?	A recognised metric for calculating carbon impact could be required, akin to BNG. However, this will create further work for the LPA and further capacity/expertise to ratify carbon assessments would be necessary.
40	Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?	More stringent building standards could support climate change adaption. A more fundamental review of the NPPF is needed to properly reflect the objectives of climate adaption.
41	Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?	No comments
42	Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?	No comments
43	Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?	No comments
44	Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?	Broadly supportive but the adaption of buildings needs to be considered in the context of beautiful and well-designed places. The paragraph should cross reference this point.
45	Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?	Agree; this is realistic and achievable with respect to the County Council's Waste Local Plan.
46	Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?	Agree; no concerns with the transitional arrangements proposed.
47	Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?	No comments

48	Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?	No, this could result in a temporary vacuum of supplementary guidance whilst new Supplementary Plans are prepared. Further time is needed to allow LAs to produce SPs following adoption of the new-style plan, or other forms of guidance could be published which do not form part of the development plan but are still material considerations. The majority of local planning for health guidance are currently set out in SPDs for example on the use health impact assessments. They will cease to have effect if councils do not update them as new supplementary plans. Supplementary plans require more resourcing because under the Bill they undergo a more stringent requirement in the preparation process than SPDs. But when created as a supplementary plan, it means they will have greater weight in decision-making.
49	Do you agree with the suggested scope and principles for guiding National Development Management Policies?	The scope of the NDMP must include policies relating to minerals and waste development. M&W is a specialist matter, and a one-size-fits-all approach would not be appropriate. Overarching NDMPs specific to minerals and waste management development would be strategically beneficial and provide greater certainty and clarity to planning authorities. The scope of the NDMP should also include public health issues. Currently LPAs are having to make the case individually for certain policy approaches but often with mixed results. The NDMP can help to provide certainty on the national public health priorities that planning decisions should address.
50	What other principles, if any, do you believe should inform the scope of National Development Management Policies?	See response to Q49
51	Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?	No comments
52	Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?	Minerals and Waste is a specialist area of planning and may require its own set of policies. The Council awaits further consultation on the content of the NDMP.
53	What, if any, planning policies do you think could be included in a new Framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?	The levelling up missions suggest taking a health-in-all-policies approach to improving on the social, economic, environmental and health-related conditions across communities in

		England. National and local planning should be seen in this HIAP context which also means a need for the public health sector to be clear about the role of planning in delivering identified health priorities.
54	How do you think that the Framework could better support development that will drive economic growth and productivity in every part of the country, in support of the levelling up agenda?	No comments
55	Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?	Broadly agree; higher densifications will support provision of new infrastructure to support development which will aid the LU agenda. The aim to focus housing around existing and planned transport infrastructure to create sustainable neighbourhoods that enable walking, wheeling and cycling to work supported by high quality local public transport is supported. Smaller rural sites may not be suitable for new housing development due to lack of access to key services, public transport and other key health factors leading to unsustainable living.
56	Do you think that the government should bring forward proposals to update the Framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?	Ensuring the planning and design of public spaces make women and girls, and everyone feel safe is an important determinant of health, in particular mental health and wider social cohesion considerations. Research has found increasing awareness that spaces are dominated by men and built for the 'default male' citizen. There are opportunities to take a healthy places approach to such issues and review whether Secured by Design guidelines can better support wider wellbeing, safety and security considerations.
57	Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?	Robust waste planning forms part of the circular economy and contributes to climate change adaption / mitigation. As such, waste planning should be well-integrated within national policy.
58	We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.	No comments

Appendix 3 Nottingham City Council response

Response to Levelling-up and Regeneration Bill: reforms to national planning policy

Published 22 December 2022

1 Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?

The 5-year land supply and housing delivery tests are tools that essentially measure the same thing- housing delivery in a LPA. Having both is unnecessary, so removing the requirement for a five year land supply will remove significant argument particularly at planning appeals where the precise level of housing land supply is often a matter of dispute. Approach properly reflects a 'plan led' system.

Government also needs to acknowledge that plan-making is a continual process and to keep a local plan less than five years old requires work to start on a new plan, very soon after adopting the first plan. In order to enable local planning authorities to resource this process planning fees should be increased to provide funding for local plan making as well as decision taking, and ring fenced to protect planning departments.

2 Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

Agree that buffers should not be required. The buffers can lead to councils with legitimate reasons for having a tight land supply (eg being Green Belt, constrained authority boundaries) being penalised, so removing the buffer requirement is justified.

It is not allocation that is the issue, but the delivery of planning permission once granted.

3 Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?

This is logical, as the current situation potentially penalises pro-growth authorities who have allocated sufficient land, when this land is developed early in the plan period.

4 What should any planning guidance dealing with oversupply and undersupply say?

No comment on the specifics of the guidance. The City Council thinks that the proposal is reasonable and is supportive. Undersupply is accounted for in the standard method, through the application of the affordability ratio.

Where there are strategic plans which straddle lpa boundaries, this could be considered on a plan wide basis, and could be included within the scope of the new 'alignment policy'.

5 Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

No specific comment, although recognition that cities have special issues in terms of representation in forums, and the current model neighbourhood plans does not work well in Cities (as evidenced by the lack of take up in these areas). NCC would like to see changes to the approach to reflect and address the complex and diverse neighbourhoods present in Cities. In particular, issues of multiple deprivation, very diverse communities, low incomes etc, need very significant assistance and capacity building if Neighbourhood Plans are to be prepared successfully.

6 Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

So long as there is emphasis on the quality of development and directing homes to the right location rather than the focus being purely on the volume of housing. Support the reference to 'supporting infrastructure' at paragraph 7, as this can help to overcome objections to development, and supports levelling up priorities.

7 What are your views on the implications these changes may have on plan-making and housing supply?

A standard method is supported, as it provides clarity and certainty, but the 35% increase for the 20 largest conurbations is completely arbitrary and is not based on any evidence. Nottingham will be unable to meet its housing requirement in the future, due to tightly constrained boundaries and will be unfairly penalised. This in turn stands to jeopardise the City's reputation and ability to work across boundaries with neighbouring authorities.

Recognition of capacity/housing land supply needs to be part of the consideration.

8 Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

Nottingham City Council would find it helpful if the exceptional circumstances (referenced in Paragraph 61) relating to 'the particular characteristics of an authority' could be clarified. We welcome the recognition that local factors, such as a large student population, can be an exceptional circumstance. In Nottingham,

we would expect that the extremely constrained boundaries of the local authority area would also constitute a genuine exceptional circumstance, because meeting need plus 35% would be likely to lead to negative impacts of inappropriate densification, for instance by blocking views, impacting on heritage assets, pressure to develop open space, etc.

There needs to be some flexibility to allow for local circumstances to be taken into account.

9 Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

In some areas, Green Belt boundaries may have been established several decades ago and it will not always be appropriate that they should remain completely unchanged. There should be provision for Green Belt review to accommodate growth where this is agreed, and to ensure development takes place in the most sustainable locations (eg avoiding 'leap frogging' of the Green Belt). Density and character will be covered in design codes and these should play an important role in assessing the impacts of meeting housing needs on an area.

It is fair and appropriate that past over-supply should be taken into account.

10 Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?

The starting point should be the Strategic Housing Land Availability Assessment. The guidance in design codes for an area will also be useful in this regard, as will height studies and heritage assessments etc. Use of 3D modelling can be particularly useful.

11 Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?

Nottingham City Council supports the government's proposals to deliver a more 'proportionate' approach to examination. In particular the City Council welcomes a more reasonable approach to assembling the local plan evidence base; this is due to the cost, officer resource and time taken to commission studies. These studies often need to be revisited as the plan progresses due to the pressure of meeting the justified Test of Soundness. The City Council believes that the preparation of the evidence base is one of the most significant factors in determining the length of time take to prepare a Local Plan. In order to move to a 30 month preparation

period for a Local Plan, it is imperative that there is a 'proportionate' approach to examination is adopted, and for this approach to be clear and unambiguous.

Being prescriptive about the timescales for plans will also have the impact of reducing engagement and democratic involvement in plans, which will result in less community ownership of the final plan. Different areas are more complex than others, so a blanket 30 months is not appropriate. It will be much easier to meet the timetable in a market town/rural lpa than in a complex City environment.

Further clear guidance on the scope and reach of the evidence base is also necessary, to both guide lpa's and the planning inspectorate.

12 Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

The City Council would request that plans at the pre-submission consultation stage (within 3 months of the introduction of this policy change) are also not subject to the existing justified Test of Soundness. We are currently moving to this pre-submission stage of consultation, and we would appreciate certainty now as to which Test of Soundness are applicable to our plan. If there were to be any delay to the government's proposed timing, this could entail us having to rethink the scope and extent of our evidence base, which would result in delay to our timetable.

As the proposal would not hinder more advanced plans, the revised tests of soundness should be introduced when the revised NPPF is published.

13 Do you agree that we should make a change to the Framework on the application of the urban uplift?

The City Council does not support the imposition of the uplift, which does not seem to take into account the constrained nature of many local authority boundaries, and issues of viability that developers are faced with when developing sites in an urban brownfield area.

Paragraph 62 of the NPPF could be made clearer with a cross-reference to the policies that would apply when considering whether the uplift can be met.

There needs to be recognition that a full range of different types of homes need to be provided, and cramming homes into urban areas will jeopardise balanced housing provision.

14 What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

Priority to uplift authorities for funding and assistance would be the most beneficial help that could be given to local authorities to help deliver homes in urban areas. However, it is unlikely to deliver either the whole of the uplift, or the typologies of new homes required.

Regular contact to review the situation with authorities would also be helpful. It is unreasonable for government not to assist authorities with delivery, where issues have been flagged. Imposing targets without assistance will only lead to further failure to deliver the number of homes required.

Notwithstanding the guidance that the uplift should be met in the areas in which the uplift occurs, in areas like Nottingham, half the built up area of the City is in the surrounding Districts. If the uplift remains, guidance should cover the entirety of the urban area of the City region, and not just the part that falls within the local authority boundaries of tightly under-bounded Cities

If the uplift is to remain, the same guidance relating to the standard method being a starting point should also be explicitly applied to the uplift figure.

15 How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

The future alignment policy (to replace the Duty to Cooperate) urgently needs to address urban uplift, clearly and unambiguously. It will not always be possible to deliver the uplift solely in urban areas, which is certainly the case in Nottingham. In this scenario, there should be a collective responsibility to ensure that the uplift is delivered across wider economic and housing market areas to ensure sustainability.

If the Government is serious about boosting housing provision, the best approach would be for the government to mandate strategic planning across meaningful housing market areas or other functional geographies.

16 Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

Agree with this. There is no requirement to prepare a policies map at the Regulation 18 stage however.

17 Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

No comment – not sure which constraints the question is referring to.

18 Do you support adding an additional permissions-based test that will ‘switch off’ the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

Yes, this is supported.

19 Do you consider that the 115% ‘switch-off’ figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

The switch off should apply at 100% and no more. A 15% ‘buffer’ does not reflect real levels of non delivery, which are much lower in Nottingham. The local planning authority should not be penalised for the decline in economic conditions or developer actions which it cannot control.

20 Do you have views on a robust method for counting deliverable homes permissioned for these purposes?

Should relate to the planning application granted.

21 What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

The Housing Delivery Test should be withdrawn. Local Planning Authorities are responsible for determining planning applications and monitoring the progress of those. They should not be accountable for delivery and penalised for the inaction of developers. The consequences of failing the Housing Delivery Test should be immediately suspended as this situation is hugely damaging and contrary to the fundamental objectives of the planning system.

If the HDT is retained, then the consequences should be frozen.

22 Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

Yes. Nottingham City Council (NCC) strongly supports such a revision. The most pressing need in the city is for social housing for rent, and in particular we need 3 or more bed homes. This need is exacerbated as a result of the reduction in numbers of socially rented homes as a consequence of the operation of the Right to Buy policy, which does not permit the replacement of those homes at equivalent numbers. Whilst there will also be a desire for other forms of low cost housing, the highest need is for socially rented homes so more weight attached to these is important. We would also support 'social rented' homes being distinguished from 'affordable rented' homes in the guidance for planning policies and decisions.

If yes, do you have any specific suggestions on the best mechanisms for doing this?

Housing needs assessments need to be respected as part of the process, as challenges to these can cause delays in delivery. Needs assessments could be supported by evidence of losses in numbers of socially rented homes (eg through sales under the Right to Buy) which can be factored into the mechanism used to justify replacement social rented homes. In the absence of any changes to the Right to Buy policy, it would be beneficial to allow local authorities to retain receipts from Right to Buy sales for a longer period to strengthen the ability for re-provision.

It would be beneficial to have a more robust approach to ensure on site social/affordable housing delivery.

23 Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

Yes. This objective is welcome as is the outcome intended, to support the increased supply of older people's housing in various forms is important.

24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

Provision of smaller sites may support smaller builders, but there needs to be recognition that lpa's only provide planning permissions, and are not responsible for delivery.

25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

Small sites can often be inherently more costly to develop, so this makes for challenges especially for the provision of affordable and social on these sites. This means that the policy needs to be accompanied by funding to help unlock the viability of such sites for low cost housing.

Adequately resourcing planning departments and statutory consultees would help by reducing the risk in timescales for SME builders.

26 Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

The development of affordable / low cost housing by small community led organisations, housing co-operatives and alms-house type charities is desirable and can add to the mix of provision available in a local area. Bona-fide organisations of this type have a long history of provision which has been beneficial.

However, this has to be set against the consumer and other safeguards that are provided by the regulatory process, and it is noted that there is already a ‘lighter touch’ degree of regulation for small organisations, which would include these types of providers. As such an appropriate balance needs to be set. This balance also needs to consider the resources that might need to be deployed in scenarios where organisations have sought to use any reduced threshold to avoid the safeguards that may otherwise have been expected.

We are reminded of the situation that has emerged with some providers of ‘supported exempt accommodation’ using statuses of Community Interest Companies (CICs), for example, to secure public money with little or no safeguards around the provision of support. This has resulted in government and local authorities having to fund investigatory activity, which is an additional burden to the taxpayer.

So any amendments need to ensure that only bona-fide charitable alms-house trusts or genuine co-operative status organisations could make use of such changes.

27 Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

Not applicable as assume applies to rural exception sites which is not relevant in Nottingham City.

28 Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

Not applicable as assume applies to rural exception sites which is not relevant in Nottingham City.

29 Is there anything else national planning policy could do to support community-led developments?

The main barriers to this type of development are not planning related, so explicit recognition that cities have special issues in terms the complex and diverse neighbourhoods present. In particular, issues of multiple deprivation, very diverse communities, low incomes etc, need very significant assistance and capacity building if community led developments are to be successful.

30 Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?

NCC welcomes the recognition that the lack of delivery of homes is not the fault of the planning system. However, the system as proposed is unworkable, and needs development to make it effective, without jepopardising the fundamental principle of planning that permission goes with the land. as it currently stands, such a provision would be easily side-stepped by such developers purporting to be a different legal entity, the Government needs to ensure the approach is unworkable and unhelpful.

31 Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?

NCC does not support this suggestion and neither option would be a helpful addition to planning legislation.

32 Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?

Options (a) and (b) may improve public accountability to name and shame affected developers, option (c) is unlikely to be effective for the reasons given above.

33 Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

The use of the term 'beautiful' is unhelpful, as there is no definition, and can be interpreted in different ways. More encompassing 'good design' is what is required, together with timely and sufficient infrastructure to support new development.

34 Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places', to further encourage well-designed and beautiful development?

No. See comments above.

35 Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

Yes.

36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?

No. NCC considers this an inappropriate level of detail for the NPPF, and different solutions will be appropriate in different locations

37 How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?

Biodiversity Net Gain should help in reducing inappropriate nature interventions. More detail would be welcome to assist in preparation for BNG.

38 Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?

Not applicable to Nottingham City Council.

39 What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

The City Council considers that carbon reduction is better delivered through the Building Regulations rather than the planning system. This will have the benefit of capturing permitted development.

Any methodology introduced should be simple and clear.

40 Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?

The City Council considers that carbon reduction is better delivered through the Building Regulations rather than the planning system.

More stringent building standards could support climate change adaption. A more fundamental review of the NPPF is needed to properly reflect the objectives of climate adaption.

Providing clear guidance and standard approaches for small builders/self builders will help to reduce barriers.

41 Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

Yes.

42 Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

Yes.

43 Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?

Yes.

44 Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

Yes.

45 Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

Nottingham City Council considers that the 30 June 2025 timetable is reasonable if the NPPF changes are implemented as currently scheduled for Spring 2023. For the legislative changes, the City Council asks that government provides regular communication with local authorities about timescales. If delay is anticipated, it is necessary that the 30 June 2025 timescale is reviewed.

The 31 December 2026 timescale is unreasonable as currently worded. The duration of time from submission of a Local Plan to the examination being concluded is usually not within the control of the local authority. In addition, it is highly likely that PINs will see an influx of plans at this time and will not be able to ensure that all plan examinations can be concluded, in time for local authorities to be adopt their plan before the deadline. The 31 December 2026 deadline should be deleted and a submission to PINs deadline should only remain.

The 30 month plan preparation period makes no distinction between areas which are relatively easy to plan for, like rural areas with small settlements, and large complex urban areas with multiple challenging planning issues, like Nottingham and other Core cities. There should be a more nuanced approach to plan making which recognises these factors.

46 Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

See comment above.

47 Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

No comment.

48 Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

The logic to abolishing SPDs is not clear or explained. SPDs are incredibly useful to supplement local plan policies in the form of guidance or site specific briefs, as they are relatively quick and resource effective to put into place. Safeguards exist via judicial review to ensure they are appropriate in terms of their scope. To replace this with a much more onerous process which requires public examination is adding very significant hurdles in terms of time and resource to putting Supplementary Planning Documents into place.

The alternative preferred by Nottingham City Council would be to keep the ability to prepare SPDs. If the proposal to abolish them proceeds, existing SPDs should remain material considerations for as long as the site/policy to which it relates remains extant.

- SPDs provide technical detail and cover a broad range of topics from student accommodation, to biodiversity net gain, climate change etc. By way of further example, last year Ipswich adopted 3 new innovative SPD's including a Low Emissions SPD - which crosses from design stage through to delivery and addresses the impact on their Air Quality Management Areas.
- Local Plan policies can often be misinterpreted/manipulated upon adoption and SPDs provide a vital way of clarifying policies to ensure that they remain effective. If the ability to provide clarification (in a robust way via SPD) is removed, then the local planning authority is exposed to risk at appeal. It would not be resource-efficient to have to prepare an entire Supplementary Plan to clarify one particular policy.
- It is not appropriate to put the level of clarification/detail contained within SPDs into the Local Plan. This would unduly increase the size of Local Plans and increase preparation timescales.
- It is not unusual for local planning authorities to have 10 SPDs each, if these authorities required 10 Supplementary Plans it is possible that there would be a consequent impact on PINs capacity to undertake Local Plan and Supplementary Plan examinations.
- It will be vital to consider the relationship between national DM policies and SPDs/Supplementary plans, and how local authorities will be able to provide further advice on local implementation. SPDs may be the most efficient way of doing this (noting the issue highlighted in the previous bullet point).

49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

Note that further consultation will follow on the detail of NDMPs. Local policies are likely to be required to explain how national policies apply to local circumstances. Local policies will also be required to deal with local circumstances.

In the event of a conflict between local and national policy, local policy should prevail where the plan is up to date, given the plan will have been subject to examination.

50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?

NDMPs should be strictly restricted to matters where their application can be uniformly applied.
They should be framed help provide clarity where other regulatory regimes should apply rather than planning policies or conditions.

51 Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

Some additions could be helpful, but should not fetter the ability for lpa's to ensure that the full range of housing needs are met within their areas, and new housing is delivered in the most sustainable way for any particular locality.

52 Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

NDMPs should be strictly restricted to matters where their application can be uniformly applied across the Country.

Examples include:

- Green Belt Policy
- Countryside protection
- Flooding
- Air, Soil and Water quality
- Daylight and sunlight
- Basement development
- Natural Environment
- Residential mooring
- Custom and self-building

Sustainable design
Carbon offsetting
Protection and enhancement of river character and water environment
Biodiversity and habitat protection
Noise
Space standards (we suggest that they should be in the Building Regulations)
Fire safety (See earlier comments about sticking to the knitting)
Residential annexes
Agriculture and Forestry workers dwellings (in Green Belt)
Equestrian Activities (in Green Belt)
Contamination

53 What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?

Removal of permitted development rights to change from commercial uses to residential. These have had a negative impact on communities due to their unsuitability for conversion and sometimes location (especially office to residential conversions).
Properly funding planning teams.

54 How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?

Guidance on economic growth in the NPPF is extremely limited, especially when compared to the level of guidance for housing. New land hungry sectors, like logistics, are inadequately covered.

Developer contributions do not adequately cover the costs of new infrastructure.

55 Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

Policy is adequate, what is lacking is funding where there are viability gaps, especially in urban areas like Nottingham.

56 Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?

Yes. Nottingham City Council supports this.

57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

Welcome the provision of a track change version of the NPPF changes as part of the consultation.

Going forward it would be useful to have hyperlinks to the relevant parts of the NPPG given in the NPPF, and for these to be updated and maintained as necessary.

58 We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

No comments for this question.

Meeting:	JOINT COMMITTEE ON STRATEGIC PLANNING AND TRANSPORT
Date:	10th March 2023
From:	Joint Officer Steering Group

NOTTINGHAMSHIRE AND NOTTINGHAM WASTE LOCAL PLAN

1 SUMMARY

- 1.1 This report informs committee of progress with preparing the Nottinghamshire and Nottingham Waste Local Plan.

2 BACKGROUND

- 2.1 The County and City Councils are preparing a single joint Waste Local Plan to replace the Waste Core Strategy adopted by both Councils in December 2013. An initial consultation on the new Local Plan, including a 'Call for Sites' was completed in May 2020 . Underpinning the Plan is a Waste Needs Assessment which assesses the pattern of waste likely to be generated by households, commercial/industrial and construction/demolition sectors over the period to 2036, looks at available capacity and what is needed in terms of future capacity.
- 2.2 The Draft Waste Plan was approved by Nottinghamshire County and Nottingham City Council in January 2022. The Draft Waste Local Plan was consulted on between the 7th February and 4th April 2022.

3 CURRENT POSITION

- 3.1 Officers from both Councils have almost completed analysing the representations we received on the Draft Waste Local Plan , amending the Plan policies where needed and then carrying out a sustainability appraisal on them to examine their contribution to a series of sustainability objectives. AECOM have recently completed an update to the Nottinghamshire and Nottingham Waste Needs Assessment by reference to the latest data on waste flows and also existing capacity.
- 3.3 Comments made on the Draft Plan and potential revisions to the Plan were discussed by a County Council Place Select Committee on 25 January as a stepping stone to consideration by the County Council Cabinet. It is likely that the Plan when re-drafted will return to this scrutiny committee prior to reporting to Cabinet.

4 Next Steps

- 4.1 A Joint Member Working Group has been convened for Tuesday 28th March to consider the revised policies for the Plan and seek to obtain agreement over the key content of the Local Plan, prior to final assembly of the Local Plan document

and supporting evidence during April. This is the final stage of preparing the Plan which should be considered “sound” when published so will require all supporting evidence documents to be prepared and available and thus requires appropriate time to complete.

- 4.2 At present, the intention is that the Local Plan will be reported to the County Council Cabinet on May 25th with a recommendation that it be published for representations to be made. The City Council Cabinet will consider it at the first available meeting after the Council elections. This may be in June. A suitable date for commencing the representation period will be set in due course.
- 4.3 The approval of each Council will be required to submit the Plan for independent examination, prior to its adoption process.

5. Other Matters

- 5.1 Councillors have continued to express interest in viewing a waste management facility Officers will explore dates for a future visit to an energy from waste operation and a private sector recycling company.

5 RECOMMENDATIONS

- 5.1 That the Joint Committee note the progress on the production of the Waste Local Plan.

6 BACKGROUND PAPERS REFERRED TO IN COMPILING THIS REPORT

- 6.1 None.

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Meeting:	JOINT COMMITTEE ON STRATEGIC PLANNING AND TRANSPORT
Date:	10 th March 2023
From:	Joint Officer Steering Group

Transport Update

1 SUMMARY

- 1.1 This report provides an update on the transport related issues across the Greater Nottingham conurbation. The report gives an update on bus service provision, e-bike hire scheme, the social prescribing for encouraging walking and cycling project, and the new funding package from Active Travel England.

2 BACKGROUND

Broad Marsh area schemes

- 2.1 Work is continuing on the regeneration of the surrounding areas, including the cycle lanes on Canal Street. Surveys took place to determine the level abuse of the cycle lane by taxis and private hire vehicles dropping off and picking up passengers close to the Courts complex. Subsequently a new Traffic Regulation Order has now come into force that will enable prosecutions to be brought for these offences.

Transforming Cities Fund – New E- Bike Hire Scheme

- 2.2 Tenders have been received and a contract awarded to Lime Bike to operate an e-bike hire scheme in Nottingham City Councils' area launching at the end of March 2023. Locations for parking locations are currently subject to agreement between the City Council and the operator.

Active Travel Social Prescribing Pilot Project

- 2.3 A successful bid has been made to become one of eleven national pilot areas for Active Travel Social Prescribing by the City Council in partnership with the Nottingham Place-based Partnership (formerly Nottingham City Clinical Commissioning Group). The programme will be delivered in three areas of the city benefiting from investment in walking and cycling infrastructure but with poor health outcomes and low levels of active travel. These are Aspley, Beechdale, Bilborough in the west of the City, St.Anns/Sneinton in the east and Bulwell in the north. The programme will run until March 2025 and involves an investment of £1.6m to provide a range of one to one, small group and community-based walking and cycling support services and activities, including the creation of a specialist bike hire library at the Harvey Hadden Centre and funding for a project delivery team embedded in the social prescribing link worker team and community volunteer sector. The aim of the project is to support people previously not engaged or unable to walk or cycle due to health, confidence, mental wellbeing, mobility, or other physical or financial barriers to increase the number of local journeys made by cycling or walking.

Active Travel Infrastructure Funding

- 2.4 Recently, Active Travel England has announced that a further a further £200million is being made available to local authorities to improve cycling and walking infrastructure¹. Officers from both City and County Councils are preparing bids for this funding, ready for the deadline of submissions on 24th February 2023. Detailed consultation and implementation of any works would take place in the 2023/24 financial year.

Future Transport Zone

- 2.5 The trial of wireless charging of electric taxis at Trent Street has now come to an end and the equipment is being removed. The installation was a successful proof of concept and useful discussions have been had with taxi operators to consider a switch to electric vehicles and to support the development of this technology.

Zero Emission Bus Regional Area (ZEBRA)

- 2.6 The City Council in partnership with Nottingham City Transport (NCT) was successful in the latest bidding round for this Department for Transport fund with arrangements to purchase 78 electric single and double decker buses, and associated depot and charging infrastructure to be operated by NCT. It is expected the new buses will come into service during 2023.

Bus Service Improvement Plan (BSIP)

- 2.7 Work continues on the implementation of Nottingham City and Nottinghamshire County councils BSIP plans particularly for the implementation of bus priority measures on the radial routes in and out of Nottingham. Where feasible this is being integrated with other programmes such as the Transforming Cities Fund, Future Transport Zone and the Active Travel Programme, to ensure that schemes are well designed and benefit both bus users, cyclists and pedestrians. The Project Execution Plan for the Greater Nottingham Bus Priority Schemes has been agreed and that the first tranche of Bus Service support has been allocated to operators totalling £484,000 for the period Oct 22 to July 23.
- 2.8 Work on the Fares Support Package was paused at the request of DfT to take account of the National Fares initiative implemented from January 2023 which introduced a maximum £2 single fare for all local bus journeys. This has included all operators in the area and has been promoted by extensive advertising both on and off buses. The £2 national fare initiative doesn't have that much bearing on the fares support packages within the BSIP. However a Project Adjustment Request has been submitted to the DfT to replace the £75,000 jobseekers work package with a care leavers scheme - following further consultation with operators which identified that stakeholders within the Employment and Skills sector were already very active in this space.

¹ [£200 million to improve walking and cycling routes and boost local economies - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/200-million-to-improve-walking-and-cycling-routes-and-boost-local-economies)

3 RECOMMENDATION(S)

3.1 It is recommended that the contents of this report be noted.

4 BACKGROUND PAPERS REFERRED TO IN COMPILING THIS REPORT

None

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Meeting:	Joint Committee on Strategic Planning and Transport
Date:	10 March 2023
From:	Joint Officer Steering Group

Greater Nottingham Joint Planning Advisory Board Update

1 Summary

- 1.1 The Greater Nottingham Joint Planning Advisory Board (JPAB) oversees the preparation of aligned Local Plans across Greater Nottingham, and the implementation of projects funded through the partnership. This report updates the Joint Committee on the work of JPAB, and other strategic planning matters within the remit of the Committee.

2 Background

- 2.1 The last meeting of JPAB was held on 13 December 2022, the latest available approved minutes are from the meeting held on 27 September 2022 and are included below. The meeting agenda papers are available to view at <https://www.gnplan.org.uk/meetings/>.
- 2.2 JPAB had previously agreed that the Greater Nottingham Strategic Plan should be prepared on the basis of each council meeting its own housing need as determined by the Government's standard method (plus appropriate locally determined buffer), except for Nottingham City which does not have sufficient supply to meet the Government's standard method housing need figure. Nottingham City will therefore use the housing supply figure to 2038.
- 2.3 A 'Preferred Approach' version of the Strategic Plan has been prepared on the basis of the approach set out above, and can be found at <https://www.gnplan.org.uk/consultations/greater-nottingham-strategic-plan-preferred-approach/>, together with all supporting documents. The Preferred Approach is not a full version of the Greater Nottingham Strategic Plan, but focuses on housing and employment growth. It proposes a vision for Greater Nottingham together with housing and employment objectives to support the delivery of the vision. The Vision is based on the outcome of the JPAB Councillor workshops which took place in 2021.
- 2.4 Following approval by Broxtowe, Gedling and Rushcliffe Borough Councils, and Nottingham City Council, the Preferred Approach was published for consultation on 3 January, with a closing date of 14 February.
- 2.5 The Preferred Approach includes the proposed development strategy which focuses on new development linking to and enhancing Blue and Green Infrastructure and promoting urban living within the main built up area of Greater Nottingham. It promotes development of a lesser scale adjoining Hucknall (in Gedling Borough) and at key settlements in the Borough areas.

- It seeks to embed the principles of the '20 minute neighbourhood' approach, and recognises the economic development potential of key sites including the former Ratcliffe on Soar power station, Toton and the wider Broad Marsh area.
- 2.6 Housing targets are provided, based on the approach set out in paragraph 2.2 above, and the strategic sites and locations where growth will take place are identified. An important point to note is that the majority of housing proposed is already identified or provided for in current Local Plans, although an extension to an existing strategic development site is proposed in Gedling, and the Broad Marsh area in Nottingham City is identified as suitable for mixed uses, including open space and significant residential development.
- 2.7 A brief summary of consultation responses processed so far is included in Appendix 2.
- 2.8 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 late 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.
- 2.9 In terms of other Local Plans across Greater Nottingham, it was reported that Ashfield District Council are preparing a Publication (regulation 19) version of the Ashfield Local Plan, and Erewash Borough Council are intending to submit their Core Strategy Review for examination in December 2022. (subsequently submitted with an Inspector appointed).
- 2.10 The next meeting of JPAB is on 7 March 2023.

3 Recommendation(s)

- 3.1 It is recommended that the Joint Committee note the contents of this report.

4 Background papers referred to in compiling this report

- 4.1 JPAB Papers, 13 December September 2022

Contact Officer

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APPENDIX 1

ITEM 3. MINUTES OF THE GREATER NOTTINGHAM JOINT PLANNING ADVISORY BOARD (JPAB) VIRTUAL MEETING HELD ON TUESDAY 27 SEPTEMBER 2022 VIA MS TEAMS
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PRESENT

Ashfield: Councillor Matt Relf (sub)

Broxtowe: Councillor Milan Radulovic (Chair); Councillor D Watts

Gedling: Councillor J Hollingsworth

Erewash: Councillor M Powell (Vice Chair)

Nottinghamshire County: Councillor R Jackson

Rushcliffe: Councillor R Upton

Officers in Attendance

Ashfield: Christine Sarris

Broxtowe: Ruth Hyde; Dave Lawson; Mark Thompson; Tom Genway

Derbyshire: Steve Buffery

Erewash: Oliver Dove; Adam Reddish

Gedling: Alison Gibson; Mike Avery

Growth Point: Matthew Gregory; Peter McAnespie

Nottingham City: Paul Seddon

Nottinghamshire County: Steve Pointer

Rushcliffe: Leanne Ashmore; Richard Mapletoft

Observers

Simon Atha

Mike Avery

David Bainbridge

Andrew Bamber

Rebecca Bentley

Jenny Brader

George Breed

Angela Brookes

Grace Clarkson

Ian Deverell

Jack Dickinson

Joe Drewry

Robert Eaton

Ralph Elliott

Steve Freek

Robert Galij

Chris Gowlett

Matthew Harmsworth

Amy Harrison

Eleanor Higgs

Iain Hill

Greg Hutton

Andrew Johnson

John King

Richard Naylor

Rebekah Newman

Sean Nicholson

Matthew Puce

Jake Robinson

Ryan Simpson

Sally Smith

Paul Stone

Phillipa Ward (notes)

Rob Webster

Ben Wilkinson

Colin Wilkinson

Nichola Willder

Apologies

Ashfield: Councillor J Zadrozny; Councillor Sarah Madigan

Broxtowe: Ryan Dawson

Derbyshire County: Councillor Carolyn Renwick; Jim Seymour

Erewash: Steve Birkinshaw

EMDevCo: Ken Harrison

Nottingham City: Councillor Sally Longford; Councillor Kotsonis; Councillor Neal

Introductions and Apologies

1. The Chair welcomed everyone to the virtual meeting and apologies were noted.

2. Declarations of Interest

There were no official declarations of interest. The Chair wished to place on record that he represented a number of applications within Derby City and Amber Valley.

3. Approval of Minutes of the Last Meeting and Matters Arising

The Minutes of the previous meeting held on 7 June 2022 were approved with the following amendment page 003 Item 5 second paragraph: “ the supply will exceed the need”.

Matters arising would be covered under agenda items during the meeting. The Chair confirmed (at the point in time of the meeting) that the new Minister for LUHC was The Rt Hon Simon Clarke MP. [Since 25 October 2022 the Rt Hon Michael Gove MP was appointed.]

4. Greater Nottingham Strategic Planning Update (Matt Gregory)

4.1 MG asked both Ashfield and Erewash to provide their respective Local Plan updates.

4.2 CS (ADC) advised that their Regulation 18 consultation will be reported to Cabinet. Following their recommendation Working Panel Option C to progress to the next consultation suggesting fewer housing numbers in the Green Belt.

4.3 MP (EBC) advised that they are finalising their evidence base prior to submission to the Secretary of State, which is expected to be by the end of the year or early in the new year

4.4 MG shared a slide presentation on the Preferred Approach document which was circulated to Members with the agenda papers.

- 4.4.1 Slide 1: showed the key principles for growth around Greater Nottingham. A document has been prepared for consultation. There are some gaps highlighted in the report. The Preferred Approach is not a full Strategic Plan. The information and views gathered from the Councillor workshops held last year this has helped to formalise our position. The full version of the Plan will be published for consultation in 2023.
- 4.4.2 Slide 2: The structure of the document is brief and focused covering the background priorities and vision for area. It explains the planning strategy and approach to housing and employment need. There is a section on Strategic Sites and key requirements.
- 4.4.3 Slide 3: The Planning Strategy includes Blue and Green Infrastructure, new and enhancing through individual development. It promotes urban living with most growth within Nottingham, and some adjoining in existing allocations and extensions to existing allocations. Further development is identified adjacent Hucknall at key settlements, the detail to be determined through Local Plans and reviews. The approach considers quality of life and promotes the 20-minute neighbourhood principles. Key sites are Ratcliffe on Soar, Toton and Broad Marsh for further development.
- 4.4.4 Slide 4: Approach to Housing Need – a table as explained at the last meeting provided figures for each of the councils' areas over the 2022-2038 plan period. These proposed figures include the flexibility buffer to ensure minimum housing targets are met.
- 4.4.5 Slide 5: Approach to Housing Need – Targets for boroughs would use the standard methodology but the target for NCity's anticipated supply falls slightly short by 2,600 homes. The boroughs have 10% buffer to meet their housing target in full. No flexibility buffer is proposed for NCity. The targets will be used in the Housing Delivery Test and 5-year land supply calculations and flexible buffers should not influence the 5-year land supply and housing need.
- 4.4.6 Slide 6: The vast majority of homes will be developed in built up areas and are already included in current Local Plans carried forward into existing or revised Part 2. GBC will extend their current developments at Teal Close and Top Wighay. NCity reported significant changes since its last Core Strategy with major opportunities for further developments at Broad Marsh. Borough councils have key settlements, and BBC and RBC have sufficient sites already included in their existing Local Plans with no new release proposed. GBC expects some further allocations for further review of the Local Plan.
- 4.4.7 DW asked for an explanation about the flexible buffer and provision for borough councils and wanted to know if this included taking on excess from NCity. MG confirmed that boroughs had a 10% flexible buffer to ensure their minimum housing provisions would be met and will be able to deliver in full. He continued that if sites were not delivered due to delays in planning or from

land owners the buffer would be available. These figures have not been transferred from NCity.

- 4.4.8 CS referred to the 20-minute neighbourhood but believed there is wider scope to include transport networks to various settlements for a strategic infrastructure. MG confirmed that Strategic Infrastructure is set out in the Infrastructure Delivery Plan which is in draft alongside the Strategic Plan. Transport modelling has stalled due to staff resources. They will now be commissioning work over the coming weeks as part of the Delivery Plan. A 20-minute Neighbourhood will be the subject of a more detailed report at the next JPAB meeting to explain the work we are doing which will be of interest to councillors.
- 4.4.9 Slide 7: The Summary of Housing Need targets was illustrated by bar chart starting with 52,512 homes using the standard method (includes NCity's uplift). The housing target is 49,900 and the buffer is 52,300. The estimated housing supply for SHLAAs total capacity is significantly above that figure, at around 58,000.
- 4.4.10 Slide 8: Approach to Employment Need – based on Employment Land Needs study. The Preferred Approach document uses the Regeneration Scenario at the upper end of the forecast needs study matching aspirations of the LEP Strategic Economic Plan. It includes offices and industrial and warehousing jobs. Economic development is promoted for NCity in the City centre including Broad Marsh and sites at Toton and Ratcliffe on Soar in the Plan. Existing sites in current Local Plans will be carried forward into the Strategic Plan. Managing existing employment allocations with good quality contributions but if they are not serving those priorities they will be released for housing.
- 4.4.11 Slide 9: Strategic Distribution/Logistics Study has been finalised and is available on the website. A call for sites is now closed and officers are currently collating sites which need to be assessed. The approach to logistics will be included in the next version of the Strategic Plan.
- 4.4.12 Slide 10: Next Steps – The preferred approach to be considered by each council, and is due to be published for consultation this year. We will need to work through comments and prepare a full Strategic Plan for consultation under Regulation 19 next year. The Plan is intended to be submitted at the end of next year.
- 4.5 MR thanked MG for his clear explanation.
- 4.6 MRelf advised that Ashfield are reducing their housing numbers based on government rhetoric with the Standard Methodology now out of date. Government may be allowing more local control but if there were changes to legislation the Plan may need to be reassessed in this area.

- 4.7 CS expressed the merit for J27/J28 to support logistic businesses within the JPAB area.
- 4.8 MG recognised the uncertainty around planning reform. We should watch closely for any Government change. The approach they have taken for standard need as a starting point for housing targets is explained in the Plans. NPPF highlights the green belt as an important planning consideration that can be taken into account when looking at housing targets and there may be more flexibility with planning reform. Jobs are important and logistics industries are capable of operating within the wide geography having access to good transport road/rail networks. Studies undertaken over the wider Greater Nottingham area need to be mindful to include Derbyshire due to the M1 running between the two counties. Logistically the M1 sits close to EBC's area but not with any other Derbyshire district. It was suggested that Bassetlaw should also be factored into the final Approach.
- 4.9 DW was concerned with the timescale for publication by mid-2023 bearing in mind the elections in May next year. He sought clarification for climate change and related policies being included in Part 1 or in Local Authorities Part 2 Plans.
- 4.10 MG was mindful of the forthcoming elections. He confirmed that the Strategic Plan would not be published prior to the elections. Climate Change policies will be included in Part 2 Plans and would be front and centre of the Strategic Plan. The draft Plan will reflect aspirations for all councils to be carbon neutral by 2038 to address government targets. This will be covered much more comprehensively in the final version of the Plan.
- 4.11 MR asked if the effect of Enterprise Zones on traffic modelling would be included covering Nottinghamshire/Derbyshire. MG confirmed that these should be factored in once allocations were known and could be built into the base case model.

MR moved all Recommendations from the Chair. Cllr M Powell seconded. Board voted and unanimously agreed.

Joint Planning Advisory Board was recommended to:

- (a) **CONSIDER** the Greater Nottingham Strategic Plan Preferred Approach (sent to members alongside the agenda);
- (b) **AGREE** to refer the Preferred Option document to relevant Council internal approval processes, subject to subsequent changes by Executive Steering Group; and
- (c) **NOTE** the position with Local Plans in Ashfield District and Erewash Borough.

5. **Waste and Minerals Local Plans Update**
(Steve Pointer/Steve Buffery)

5.1 Nottinghamshire/Nottingham

SP advised that officers from both authorities are still considering the outcomes from the consultation on a Draft Waste Local Plan for publication in 2023. They have commissioned AECOM for further expertise relating to the Waste Needs Assessment and to consider the comments in respect of existing capacity and waste facilities which should limit the level of landfill sites. The Plan will be revised over the autumn then both NCity and NCC Cabinets will consider it.

5.2 Derbyshire/Derby

5.2.1 SBf updated their position of the Minerals Local Plan. In June 2022 DCity and DCC had logged and summarised over 800 representations following their eight-week consultation of the Draft Minerals Local Plan. They have now prepared a draft Statement of Consultation to present to the Joint Advisory Committee. It has been published and is available on the DCC's website. In summary the key policy issues would be their approach to fracking, climate change and individual sand and gravel sites in the south Derbyshire districts. They are currently considering options for the next phase for consultation.

5.2.2 Background papers and Evidence Based reports have been prepared but awaiting approval by DCity and DCC before being rolled out for consultation at an agreed timescale.

MR welcomed authorities being able to work together and co-operate. He would like fracking to be kept under review in the light of Government statements. He offered thanks for the very clear and concise updates.

Joint Planning Advisory Board was recommended to NOTE the progress with the Nottinghamshire/Nottingham and Derbyshire Waste and Minerals Local Plans.

6. HE Capacity Funding – Quarter 1 (Year 6) April to June 2022 (Peter McAnespie)

6.1 PMc reported that EBC's £100,000 will be spent in Quarter 3 towards the Kirk Hallam Relief Road study.

6.2 GBC has committed its £50,000 remaining funding.

6.3 NCity were awarded £70,000 for works to the Waterside Project. There is £20,000 remaining which is expected to be committed in the new year.

Joint Planning Advisory Board was recommended to NOTE this report and the details set out in Appendix 1.

7. **Project Management Support for the Strategic Plan**

(Matt Gregory)

- 7.1 MG reported that approval had previously been given to provide project management support over the last two years on a secondment basis to assist with the Strategic Plan. The post holder has now returned to their substantive position. He asked for Board approval to spend approximately £111,000 to recruit again via a secondment from the partner councils for a further two years. This would allow support work for examination and adoption of Strategic Plans being funded from the existing budget.
- 7.2 The Chair accepted the recommendation and seconded. It was unanimously agreed.
- 7.3 MT received recognition for the good work he had provided during his secondment within the Growth Point team.

Joint Planning Advisory Board was recommended to APPROVE spend of approximately £111,400 to allow recruitment to the Conurbation Planning Manager post for a further period of two years, to be funded from the Greater Nottingham Planning Partnership budget.

8. **Future Meetings 2022/2023**

- 8.1 It is proposed to provide future meeting dates for 2023 at the next meeting.

DATE	TIME	VENUE
Tuesday 13 December	2.00 pm	Microsoft Teams Virtual meeting

8.2 Proposed Meeting Dates 2023

DATE	TIME	VENUE
Tuesday 7 March	2.00 pm	Microsoft Teams Virtual meeting
Tuesday 6 June	2.00 pm	Microsoft Teams Virtual meeting
Tuesday 26 September	2.00 pm	Microsoft Teams Virtual meeting
Tuesday 12 December	2.00 pm	Microsoft Teams Virtual meeting

9. Any other business

- 9.1 The Chair suggested another Member/Officer Workshop (including local MPs and representation from DLUHC) to be held once the approach to planning reform becomes clearer to incorporate all the changes to be expected around the Greater Nottingham area and how these changes will affect us including EZ and Planning Reform and how they will all interact. He emphasised the need to continue to work together in a positive and constructive manner throughout the Plan period to demonstrate our capacity and ability to deliver jobs, opportunities and training and to gain a better understanding in our particular areas for housing supply. He thanked everyone for their attendance.

MEETING CLOSED AT 2.54 PM

APPENDIX 2

Greater Nottingham Strategic Plan: Preferred Approach Brief Summary of Representations – 20th February 2023

As of Monday 20 February, 693 comments have been logged in the Inovem consultation software. 75 emails have been received, many of which are from landowner's agents and duplicates of submissions made through Inovem. These emails are being processed and added to Inovem.

The majority of comments concern the planning strategy and housing need chapters, the promotion of additional/alternative sites and commentary on the preferred sites selected (RBC receiving the most comments, NCC the least). There were few comments by residents, with the vast majority being submitted by landowners and their agents, interest groups and statutory bodies, split as follows:

	Validated in Inovem	Pending
Total number of comments	645	48
Chapter One: Introduction	35	5
Chapter Two: Background	25	2
Chapter Three: Vision and Objectives	67	6
Chapter Four: Proposed Planning Strategy	83	5
Chapter Five: Approach to Housing Need	91	7
Chapter Six: Approach to Employment Need	36	5
Appendix A: Preferred Sites, Additions or Alternatives	67	5
Appendix A: Preferred Sites (Broxtowe Borough)	30	
Appendix A: Preferred Sites (Gedling Borough)	39	2
Appendix A: Preferred Sites (Nottingham City)	13	
Appendix A: Preferred Sites (Rushcliffe	66	1

Borough)		
Appendix B: Housing Trajectories	23	
Appendix C: Glossary		
Supporting evidence documents	70	10

The following is a short summary of the main issues raised by chapter (this is not an exhaustive list as not all the representations have been validated or read in detail):

Introduction

- Plan period should be lengthened to reflect time taken to adopt plan. 2040 (15 years from 2025). Should consider 2045 (similar to strategic plans for Bristol, Liverpool, Cambridge). Or early review mechanism.

Vision and Objectives

- Not pro-growth. Housing targets below standard method are not sufficiently aspirational.

Background

- Absence of key evidence documents should prompt flexible approach

Planning Strategy

- Over reliance on brownfield sites within Nottingham which have historically been slow. Spatial strategy should provide additional strategic greenfield sites.
- Overall support for 20 minute neighbourhoods – and delivery through strategic sites.
- Key Settlements should be focus for more growth.
- Reliance on existing permissions/allocations is a weakness and inflexible.

Housing Need

- Standard Method should be starting point and minimum. Doing otherwise does not meet the needs the population. Various figures suggested but should be minimum standard method for all LPAs plus 10% (57,753 (+5,449))
- Should deliver Gov't commitment to significantly boost housing.
- Existing shortfall within the City will increase during plan period as a result of historically slower delivery in the City. Over reliance on windfalls increases concerns.
- Housing need figure and absence of a buffer for the City is not justified and not supported by evidence
- City's unmet need (standard method) should be met by RBC/BBC/GBC (depending on landowners site location).

- Delays delivering strategic sites (notably Gamston, Toton and Chetwynd) should be off-set with the allocation and additional sites elsewhere.
- Buffers should be greater than 10%.
- Approach does not consider need to provide adequate affordable housing (HNA indicates 68% of all housing proposed in the plan should be AH) or address housing affordability.
- Implications of Freeport and HS2 must be considered with increased job creation and employment increasing housing demand.
- Promotion of numerous additional/alternative sites, including land within the city at the Victoria Centre (mixed use site).

Employment

- Absence of strategic distribution and logistics sites.
- Absence of strategic employment sites

Meeting:	JOINT COMMITTEE ON STRATEGIC PLANNING AND TRANSPORT
Date:	10 March 2023
From:	Joint Officer Steering Group

JOINT COMMITTEE WORK PROGRAMME

1 SUMMARY

1.1 To consider the Committee's work programme from June 2023 to March 2024

2 BACKGROUND

2.1 The Joint Committee work programme will assist the management of the committee's agenda, the scheduling of the committee's business and forward planning. The work programme will be updated and reviewed at each pre-agenda meeting and committee meeting. Any member of the committee is able to suggest items for possible inclusion.

2.2 The attached work programme includes items which can be anticipated at the present time. Other items may be added to the programme as they are identified.

2.3 The proposed work programme to March 2024 is attached for the consideration of the Committee.

3 RECOMMENDATION(S)

3.1 That the Joint Committee's work programme be noted and consideration be given to any future items.

3.2 That Joint Committee identify any work areas where partnership working between the two authorities would be mutually beneficial.

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**JOINT COMMITTEE ON STRATEGIC PLANNING AND TRANSPORT
WORK PROGRAMME: JUNE 2023 TO MARCH 2024**

Report Title	Brief summary of agenda item	For Decision or Information?	Lead Officer	Report Author
June 2023				
Waste Local Plan Update	To provide an update on progress with preparing the Nottinghamshire and Nottingham Waste Local Plan	Information	Stephen Pointer Matt Gregory	Stephen Pointer Matt Gregory
Mineral Plan update	To provide the Committee with evidence concerning the implementation of the Minerals Plan and latest information on assessments of need for aggregates (sand & gravel, crushed rock etc)	Information	Stephen Pointer	Stephen Pointer
Transport Update	To provide an update on key sustainable transport issues (including rail issues) for the Greater Nottingham area.	Information	Chris Carter/Kevin Sharman	Tim Bellinger / Kevin Sharman

Update on HS2 development and service to Nottingham	To provide an update on the HS2 eastern leg and the service into Nottingham	Information	Chris Carter/Kevin Sharman	Chris Carter/Kevin Sharman
JPAB Update and Greater Nottingham Strategic Plan	To provide an update on the work of JPAB including the response to consultation on the Strategic Plan preferred options.	Information	Matt Gregory	Matt Gregory
September 2023				
Waste Local Plan Update	To provide an update on progress with preparing the Nottinghamshire and Nottingham Waste Local Plan	Information	Stephen Pointer Matt Gregory	Stephen Pointer Matt Gregory
Transport Update	To provide an update on key sustainable transport issues (including rail issues) for the Greater Nottingham area.	Information	Chris Carter/Kevin Sharman	Tim Bellinger / Kevin Sharman
JPAB Update	To provide an update on the work of JPAB.	Information	Matt Gregory	Matt Gregory

December 2023				
Waste Local Plan Update	To provide an update on progress with preparing the Nottinghamshire and Nottingham Waste Local Plan	Information	Stephen Pointer Matt Gregory	Stephen Pointer Matt Gregory
Planning Policy for Sustainable Development	To provide an update on sustainable practices in planning in the context of ongoing planning reform	Information	Stephen Pointer Matt Gregory	Stephen Pointer Matt Gregory
Transport Update	To provide an update on key sustainable transport issues (including rail issues) for the Greater Nottingham area.	Information	Chris Carter/Kevin Sharman	Tim Bellinger/ Kevin Sharman
JPAB Update	To provide an update on the work of JPAB.	Information	Matt Gregory	Matt Gregory
March 2024				
Waste Local Plan Update	To provide an update on progress with preparing the Nottinghamshire and Nottingham Waste Local Plan	Information	Stephen Pointer Matt Gregory	Stephen Pointer Matt Gregory

Transport Update	To provide an update on key sustainable transport issues (including rail issues) for the Greater Nottingham area.	Information	Chris Carter/Kevin Sharman	Tim Bellinger / Kevin Sharman
JPAB Update	To provide an update on the work of JPAB.	Information	Matt Gregory	Matt Gregory

