Planning for Housing Growth in Greater Nottingham

Joint Planning Advisory Board

JPAB CIIr workshops 2021

Strategic Plan paused due to:

- Uncertainty about planning reform, in particular the approach to housing need
- Outcome of Integrated Rail Plan and implications for HS2 at Toton
- LU&R Bill now published
- Still uncertainty about HS2, although work commenced
- BUT need to progress the Strategic Plan, to make progress in advance of LU&R Act implementation, and Gov't deadline of 2023

JPAB proposed approach

- To progress the Strategic Plan, to make progress in advance of LU&R Act implementation, expected 2024
- Address ongoing 5 year land supply and housing delivery test issues within some Councils
- To ensure the strategic planning context remains up to date
- Gov't deadline for plan preparation of 2023 remains

Proposal for housing distribution

- Each District Council to meet its own housing need (as determined by the Government's standard method), plus appropriate locally determined buffer
- Nottingham City to meet as much of its housing need plus 35% uplift as it can accommodate
- Not proposed for the City Council's remaining unmet need to be met elsewhere in Greater Nottingham
- But total (including District buffers) will be more than need, even including the 35% uplift

Risks

- Tension between National Planning Practice Guidance and National Planning Policy.
- Inspector could find approach unsound leading to:
 - a revised housing distribution, or
 - withdrawal of the Strategic Plan

BUT

- Indications are that more locally sensitive approach to housing need will be part of planning reform
- Duty to Cooperate to be abolished and replaced with more flexible 'alignment test'

Reasoning

- Unmet need is part of arbitrary 35% uplift imposed by Govt
- Not based on evidence of real local need, or of practical deliverability
- Meeting unmet need would require Green Belt release in Districts
- NPPF says Green Belt release only in exceptional circumstances
- Arbitrary and unevidenced need is not an exceptional circumstance

Next steps

- 'Preferred Approach' Strategic Plan
- focusing on the strategy, housing provision, and the strategic sites required to meet the housing provision
- consult on the Preferred Approach in the autumn
- publish a full Pre Submission Strategic Plan in summer 2023
- submission for examination later in 2023