

Greater Nottingham - Broxtowe BC, Gedling BC and Nottingham City Council – Aligned Core Strategies (ACS) Examination Inspector’s Matters, Issues and Questions

Matter 4: Economic Development (Policies 4, 5, 6, 7 & part of 2)

Main issues: (i) Whether the ACS will contribute to building a strong, responsive and competitive economy to create jobs and prosperity, as expected by the NPPF, reflecting Nottingham’s Core City status and role as a Science City, as well as the need for significant regeneration.

(ii) Whether the ACS is consistent with promoting a vital and competitive town centre in Nottingham, and a network and hierarchy of centres which will serve the wider area’s communities and be resilient to anticipated future economic changes.

Questions

1. Paragraph 20 of the NPPF expects local planning authorities to plan proactively to meet the development needs of business. Paragraph 21 expects local plans to set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth. Does the ACS signal a positive and responsive approach to economic growth?
2. How will Nottingham’s economy be expected to grow and diversify to create a sufficient supply of jobs over the plan period? Which sectors will be critical for the delivery of growth? Has the potential for expansion in the Greater Nottingham area of the knowledge-based sector and the other industries listed in paragraph 3.4.3 of the ACS been analysed and quantified?
3. Does the evidence base¹ justify the proposals for employment provision and economic development including the figures for new office floorspace and employment land in Policy 4?
4. The Nottingham City Region Employment Land Study (NCRELS) 2007 projected the likely growth in jobs for 2003-16. The figures were partially updated, and again for the Employment Background Paper 2012, to estimate labour demand for the plan period to 2028. Some representations suggest that the NCRELS document contains inaccuracies. In view of the significant changes to the economy in recent years, and the fact that actual changes in jobs 2003-11 were not taken into account, are the estimates sufficiently robust?
5. Should quantities and more detail be added to Policy 2(4), to define “significant employment development” and complement the housing numbers?
6. Is there a case for allocating additional or extended sites in Policy 2 in Arnold and Carlton, at Leapool Island/Lime Park or Teal Close?

¹ In particular CD/KEY3-5 and CD/BACK/04

7. Is the ACS consistent with paragraph 22 of the NPPF, on avoiding protecting sites allocated for employment use with no reasonable prospect of use, and regularly reviewing land allocations? Do Policy 4 and paragraph 3.4.19 require clarification and more precision? Should criteria be added to indicate what is good employment land eg. well located for access to the motorway?
8. Is there some inconsistency between Broxtowe and Gedling Councils implicit in paragraphs 3.2.21 & 25, in that the first will only protect viable sites and the second will protect sites in general?
9. Have the Councils under-estimated the scope for additional housing sites by not re-assessing some poorly located employment sites such as Bestwood Business Park? Should Nottingham Business Park, with difficulties in attracting occupiers, be considered for more mixed use with some housing development?
10. Is Policy 4 b) which refers to action to be taken if undeveloped floorspace is below a 5 year supply figure too reactionary, and out of line with the NPPF?
11. Has the possible impact of significant new employment development at Top Wighay Farm in Policy 2 on the Rolls Royce site in Hucknall been appraised?
12. Should the ACS include more specific and localised proposals for economic development eg. in Stapleford and the north of Broxtowe?
13. Should the ACS address the role of the Universities in promoting economic growth more directly and in more detail? Should New College Nottingham be mentioned as a critical partner in improving local skills, to help develop a knowledge-based economy?
14. Does the ACS allow for economic development in rural areas in line with paragraph 28 of the NPPF?

Regeneration

15. What are the prospects for delivery for each of the sites identified for regeneration in Policy 7? Do all have the support of stakeholders and relevant funding agencies; what are the potential constraints and risks to timely delivery, and what would be the impact on the spatial strategy if these schemes failed? (Eastside, Southside, Waterside, Boots campus, Stanton Tip and Gedling Colliery/Chase Farm)
16. Is deferment of detailed planning to subsequent DPDs consistent with the Councils taking a pro-active approach to achieve delivery; and is more detailed information as to which DPDs or SPDs will provide the details of implementation available?

17. Should reference be made to the possible re-location of the bus depot and its replacement with a superstore at Eastside?

Nottingham city and other centres

18. Is there any evidence that Policy 5: Nottingham City Centre is inconsistent with the thrust of paragraph 23 of the NPPF?

19. Planning for Town Centres: Practice guidance on need, impact and the sequential approach was produced to support Planning Policy Statement 4, which was replaced in 2012 by the NPPF. However, the Practice Guidance was not. Its paragraphs 4.19-4.21 set out a clear approach for plan-makers. In the light of this guidance, should Policy 5 be more specific about the strategy for Nottingham city centre?

20. The Partial Update to the Retail Study 2013 [CD/KEY/09] includes new retail capacity forecasts, albeit the consultants caution that these are based on old household survey data and that long-term projections cannot be relied upon. Nevertheless, should some of the figures be added to the ACS to provide more certainty for prospective developers and encourage enhancement of the city centre's retail offer?

21. Paragraph 23 of the NPPF expects plans to define the extent of town centres and primary shopping areas and clearly define primary and secondary shopping frontages. Although Policy 5 refers to "the Primary Shopping frontages", it is unclear from the ACS how far these extend. Why shouldn't the Retail Study Partial Update be used to define the areas appropriately with a diagram added or descriptive wording put into the supporting text?

22. Is the network and hierarchy of centres in Policy 6 reasonable and consistent across local authority boundaries? Are these centres likely to be resilient to anticipated future economic changes, having regard for the growth proposed in Policy 2? Is there justification for any new centres, or any to be excluded from the policy?

23. Is Policy 6 consistent with the thrust of NPPF's paragraphs 23-27? In particular, has the sequential approach been set out appropriately? Should the policy or reasoned justification make clear what scale and form of development would be appropriate at different levels of the hierarchy?

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