
Nottingham City Council

Response to Matter 4



**Nottingham
City Council**

**The scale and distribution of development and the
approach to site allocations**

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Issue 1: Scale and distribution of development

Q1. *Is the scale and distribution of development proposed in the Plan consistent with the ACS? What effect would the modifications proposed by the Council have on the scale and distribution of development in the Plan?*

- 4.1 Yes. The overall level of housing provision is consistent with Policy 2 (The Spatial Strategy) of the ACS. This is set out in the Council's response to Matter 2 – Spatial Strategy.
- 4.2 The modifications proposed by the Council are generally clarifications to development management policies and development principles, and do not by and large impact on the scale and distribution of development.
- 4.3 However, there are some Submission Changes to the scale of housing development in LAPP Appendix 3 ([LAPP-CD-REG-01](#)). In particular, changes SC138 to SC158, which have been made to update the position on sites with regard to more recent information on site dwelling numbers (e.g. reflecting actual planning applications/permissions, adjusting for completions, etc, and in one case deleting a site PA22 Western Boulevard which is owned by the City Council and no longer proposed for development).
- 4.4 Taken together, these Submission Changes have the effect of increasing the anticipated housing supply over that in the Revised Publication Version LAPP by some 300 homes. This provides a further buffer against potential non delivery of sites, and also supports the 2012 NPPF objective of significantly boosting the supply of homes.
- 4.5 A new 2018 Housing Land Availability Report ([LAPP.NCC 31](#)) has been prepared in response to the Inspectors Matters, Issues and Questions. This has resulted in Proposed Post Submission change (PPSC15), which has the effect of increasing the anticipated housing by a further 1,019, to 19,786, largely as a result of new windfall sites and increasing the numbers of dwellings on existing sites to reflect recent planning permissions.
- 4.6 For employment, more recent evidence in the Employment Land Forecasting Study: Nottingham Core HMA and Nottingham Outer HMA Final Report, August 2015 ([LAPP-EMP-01](#)) has led to Nottingham City providing more industrial and warehousing land than that required by the ACS (25 hectares as opposed to 12 in the ACS). The methodology by which this approach was agreed with other councils in Greater Nottingham is set out in the appendix to the Employment Background Paper, 2016 ([LAPP-CD-BACK-01](#)).
- 4.7 ACS policy does not quantify other development needs, although retail floorspace is mentioned in the justification text to Policy 5 – Nottingham City Centre, and this is allowed for by the LAPP.
- 4.8 In the case of all development, distribution of development follows the ACS strategy of urban concentration with regeneration set out in ACS Policy 2.

Issue 2: Housing Provision, Distribution, Supply and Delivery

Q1. *Is the scale of housing provision and its distribution in the Plan consistent with the ACS? What effect would the modifications proposed by the Council have on the scale of housing provision and its distribution in the Plan?*

4.9 Yes. The overall level of housing provision is consistent with Policy 2 of the ACS. This is set out in the Council's response to Matter 2 – Spatial Strategy, and Issue 1 above.

Q2. *In addition to the site allocations identified for housing development in the LAPP the housing provision figures in the Plan (set out in Appendix 3 [LAPP-CD-REG-01](#)) include dwellings which have been built since 2011, other small sites deliverable by 2028 (taken from the SHLAA [LAPP.NCC02](#)), an allowance for windfalls and take account of an allowance for demolitions.*

- i) Is the inclusion of the figure of 4810 as proposed for modification on other small sites deliverable by 2028 (taken from the SHLAA) justified?*
- ii) Is the inclusion of a windfall allowance justified? Is the windfall allowance as proposed for modification realistic and supported by evidence?*
- iii) Is the demolition allowance as proposed for modification realistic and supported by evidence?*

4.10 i) The inclusion of the figure for other small sites deliverable by 2028 (taken from the SHLAA [LAPP.NCC02](#)) is justified. A new 2018 Housing Land Availability Report ([LAPP.NCC 31](#)) and Proposed Post Submission change (PPSC15) reduce the dwelling figure from this source from 4,810 to 4,180 based on an up-to-date assessment. These sites are considered deliverable / developable in the SHLAA. 84% are either under construction or have planning permission. Much of the remaining figure consists of sites under planning consideration and/or city centre brownfield sites, or are in the Council's regeneration plans.

4.11 ii) The inclusion of a windfall allowance is justified in line with para 70 of the 2012 NPPF. The windfall allowance as proposed for modification is realistic and supported by evidence, as seen in windfalls section (paras 21-30) of the latest Housing Land Availability Report ([LAPP.NCC 31](#)). In light of the windfalls currently being experienced in the City, the allowance is considered to be modest and conservative. A significant proportion of windfalls arise from large housing schemes, particularly in the City Centre. These have a history of swift implementation, once planning permission is granted. This is especially the case in relation to student housing schemes, which also contribute to windfalls totals, as they have target completion dates to tie in with student terms. To support this trend, both universities have stated their plans to increase student numbers in the coming years and both have experienced a shortage of first year student accommodation in the current academic year. The City Council also has policy to further encourage quality student accommodation in appropriate locations.

4.12 iii) The demolition allowance as proposed for modification is realistic and supported by evidence in the Housing Land Availability Report ([LAPP.NCC 31](#)). Since 2000 there were 8 years where demolitions averaged 20. In the other years, demolition figures were considerably higher, but this was due to an extensive programme of Council clearance plans. There are no further large scale clearance plans during the remainder of the plan period.

Q3. Have sufficient sites been allocated in the Plan to meet the minimum provision of 17,150 new homes for Nottingham City set out in the ACS?

- 4.13 Yes. It is considered that sufficient sites have been allocated to meet the target of 17,150 homes. Appendix 3 of the LAPP provides the full breakdown of housing supply to meet the 17,150 homes.
- 4.14 The Local Plan ([LAPP-CD-REG-01](#)) provides 18,767 dwellings. A new 2018 Housing Land Availability Report ([LAPP.NCC 31](#)) and Proposed Post Submission change (PPSC15) increases the anticipated housing by a further 1,019, to 19,786, - 2,636 more than the 17,150 requirement, or 15.4%, which is considered a generous buffer for non-delivery. If the minimum predicted dwellings are developed on each Local Plan site during the plan period (i.e. 7,447) then there is the potential for 1,982 dwellings above the ACS requirement, or 11.6%, which is also considered a generous buffer for non-delivery.

Q4. What are the assumptions about the scale and timing of supply and the rates of delivery? Are these assumptions realistic? What evidence is there to support these assumptions?

- 4.15 Timing and build out rates are based on information provided by developers and landowners through the direct mail-outs associated with the SHLAA process, wherever possible. If a response is not received from a developer/landowner, then the Council's assumptions are applied. Assumptions are based on the most up-to-date intelligence from Development Management, Regeneration and Property Service colleagues, local site and developer knowledge, and experience of delivery on similar sites. It should be noted that a significant part of housing delivery is in the form of flats; these tend to deliver large number of new homes in one year, so assumptions about delivery rates across years are not always relevant.

Q5. Does the housing trajectory demonstrate realistically that the housing development, for which the Plan provides, will come forward within the Plan period?

- 4.16 Yes. The housing trajectory within Appendix C of the Housing Land Availability Report ([LAPP.NCC 31](#)) demonstrates realistically that the housing development, for which the Plan provides, will come forward within the Plan period. Due to the 6,020 net completions since 2011 the requirement to meet the ACS figure of 17,150 is now 11,130 and there are 9,323 dwellings expected solely on deliverable sites, see page 37 of the Housing Land Availability Report ([LAPP.NCC 31](#)).

Q6. How has flexibility been provided in terms of the potential supply of housing land? Is this sufficient?

- 4.17 The LAPP provides for 18,767 dwellings, A new 2018 Housing Land Availability Report ([LAPP.NCC 31](#)) and Proposed Post Submission change (PPSC15) increases the anticipated housing by a further 1,019 to 19,786, - 2,636 more than the 17,150 requirement, or 15.4%, which is considered a generous buffer for non-delivery (this is made up of new windfall sites and increasing the numbers of dwellings on existing sites to reflect recent planning permissions). If the minimum predicted dwellings are developed on each Local Plan site during the plan period (i.e. 7,447) then there is the potential for 1,982 dwellings above the ACS requirement, or 11.6%, which is also considered a generous buffer for non-delivery.

Q7. *Would the Plan be consistent with the Framework, in as much as it would boost significantly the supply of housing?*

4.18 Yes. The LAPP is consistent with the Framework, in as much as it would boost significantly the supply of housing. The LAPP provides for 18,767 dwellings, A new 2018 Housing Land availability Report ([LAPP.NCC 31](#)) and Proposed Post Submission change (PPSC15) increases the anticipated housing by a further 1,019, to 19,786 - 2,636 more than the 17,150 requirement, or 15.4%, which is considered a generous buffer for non-delivery. If the minimum predicted dwellings are developed on each LAPP site during the plan period (i.e. 7,447) then there is the potential for 1,982 dwellings above the ACS requirement, or 11.6%, which is also considered a generous buffer for non-delivery.

Q8. *Is the type and size of housing provided/planned to be provided meeting/likely to meet the needs of the area?*

4.19 Yes. Policies are in place to make provision for affordable housing and for securing an appropriate mix of housing type, size and tenure and are considered consistent with para 50 of the 2012 NPPF which requires delivery of a wide choice of high quality homes, wider opportunities for home ownership and the creation of sustainable, inclusive and mixed communities.

4.20 The LAPP policies and site allocations provide for new family housing, flats, student accommodation and specialist housing (see response to Matter 6, Issue 1).

Issue 3: 5 Year Housing Land Supply

Q1. *Is it robustly demonstrated that the Plan can deliver a 5 year housing land supply throughout the Plan period, calculated in accordance with national policy and guidance, taking account of past delivery performance and applying the appropriate 5% or 20% buffer?*

4.21 Yes. The Council has demonstrated that there is a 5 year supply as explained in paras 14-20 of the 2018 Housing Land Availability Report ([LAPP.NCC 31](#)). It is robustly demonstrated that the Plan can deliver a 5 year housing land supply throughout the Plan period, calculated in accordance with 2012 NPPF, taking account of past delivery performance and applying the appropriate 5% buffer. Later in the plan period delivery will be supplemented by windfall development, and as the Council's trajectory indicates, there is likely to be some over-delivery in the early part of the plan period, so the 5 year requirement towards the end of the plan period is likely to be reduced.

Q2. *What is the current position with regard to housing supply? Is there a 5 year supply? How has this been calculated?*

4.22 Yes. Paras 14-20 of the Housing Land Availability Report ([LAPP.NCC 31](#)) provide the 5 year land supply assessment. The City Council currently has about 7.42 years supply of deliverable sites using the "Liverpool" approach and 7.87 using the "Sedgefield" approach. The ACS also sets out a methodology for assessing five year housing land supply for Nottingham City. Footnote 32 to para 3.2.11 of the ACS describes the agreed methodology which allocates any shortfall in housing over the remaining plan period in an approach known as the "Liverpool" approach. The Inspector at the Examination considered locally specific evidence which she considered justified the use of this methodology. The information in the report

demonstrates a robust 5 year supply using both the “Liverpool” and “Sedgefield” methodologies.

Q3. *Is the use of a 5% buffer appropriate when calculating the Council’s 5 year supply of deliverable housing? Is there any justification for a 20% buffer?*

4.23 The 2018 NPPF requires local authorities to identify annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing with an additional buffer of 5%, or a higher percentage if there is a record of persistent under delivery. Over the last 3 years Nottingham City Council has exceeded its housing targets therefore a 5% buffer is applicable in accordance with Planning Practice Guidance (see Appendix D of the Housing Land Availability Report) ([LAPP.NCC 31](#)).

Issue 4: Gypsies, Travellers and Travelling Showpeople

Q1. *The ACS provides a general policy approach in providing for gypsies, travellers and travelling showpeople. It also states that where appropriate the allocation of sites will be made in part 2 Local Plans in light of any revised evidence base. The LAPP does not include any policies relating to gypsies, travellers and travelling showpeople nor does it make any allocations to meet any accommodation needs for gypsies and travellers or travelling showpeople.*

The South Nottinghamshire Gypsy and Traveller Accommodation Assessment 2014-2029 (GTAA) (January 2016) ([LAPP-HOU-33](#)) identifies a need for a total of 2 additional pitches in Nottingham between 2014 and 2029. However, the Council indicates that based on supplementary evidence from caravan counts, dating back to 2014, the vacancy rate on existing sites in the city is well in excess of the GTAA need figure and therefore it does not consider there is a requirement to allocate additional pitches in the LAPP. Is this justified?

4.24 Yes. Paras 4.64a to 4.64g of the LAPP set out the reasoned justification for the Council’s approach to Gypsy and Traveller and Travelling Showpeople accommodation provision. The Sustainable, Inclusive and Mixed Communities Background Paper and Addendums ([LAPP-HOU-01](#), [LAPP-HOU-02](#) and [LAPP-HOU-03](#)) further explain the approach that is being taken by the Council to such provision.

4.25 Current provision amounts to 40 pitches and caravan counts have indicated over the three monitoring years a maximum number of caravans of 36 in July 2015, which equates to 28 pitches, leaving some 12 pitches available to absorb need. This figure dropped to 13 (10 pitches) in January 2016, leaving 30 available. A number well in excess of the 2 pitch requirement.

Q2. *Does the Council’s approach in relation to traveller sites generally conform with the expectations of the ACS and Planning Policy for Traveller Sites (August 2015)?*

4.26 Yes. It is considered that if an additional need beyond what can be accommodated on existing sites, which presented itself over the plan period, could be adequately considered under ACS Policy 9: Gypsies and Travellers and Travelling Showpeople, which complies with planning policy for traveller sites para 11 requiring a criteria based policy in such cases.

Q3. What is the accommodation need for travelling showpeople in the city? Is the Council’s approach in meeting their accommodation needs on existing sites set out in the proposed modification to the text in the Development Management Policies - Places for People section of the Plan appropriate?

4.27 There is currently no identified need for Travelling Showpeople plots in the South Nottinghamshire Gypsy and Traveller Accommodation Assessment - January 2016 ([LAPP-HOU-33](#)). Travelling Showpeople currently occupy 3 sites in Nottingham City. Proposed modification SC019 removes the Western Boulevard site PA22 allocation in recognition that this site is currently occupied by Travelling Showpeople. The council considers that small scale additional need can be accommodated on existing sites by the intensification of use on these sites. If a need beyond this was identified over the plan period, this could be adequately considered under ACS Policy 9: Gypsies and Travellers and Travelling Showpeople which complies with PFT guidance requiring a criteria based policy in such cases.

Q4. Is the Plan positively prepared, justified, effective and consistent with national policy in respect of meeting the accommodation needs of gypsies and travellers or travelling showpeople?

4.28 Yes. It is concluded that the plan is positively prepared, justified, effective and consistent with national policy on this issue. It is not appropriate to identify specific sites in the Local Plan as there is currently no qualitative evidence of need. It is anticipated that any future need could be met on existing sites and by the private sector, and should a larger need be evidenced during the plan period, it will be considered under ACS Policy 9.

4.29 A further modification is proposed at para 4.64g in order to improve the clarity of this section of the plan and highlight that it is considered that any existing need can be absorbed on existing sites. Proposed Submission change (PPSC14) is therefore proposed as follows;

| PPSC number | Para Ref/Policy | Proposed Post Submission Change |
|-------------|-----------------|--|
| PPSC14 | Para 4.64g | <p>Add a subheading before Para 4.64g</p> <p><u>“Future Gypsies and Travellers and Travelling Showpeople Need”</u></p> <p>And amend the text in Para 4.64g to read</p> <p>“...The most likely locations to meet this need will be allocated mixed-use sites which have good access to the strategic road network and which meet the criteria of Core Strategy Policy 9. <u>Small scale infill and possibly small scale site extensions are considered to be the most appropriate form of provision, which will assist in integrating gypsy and traveller and travelling showpeople sites into local communities.</u> The City Council will continue...”</p> |

Issue 5: Employment Provision, Distribution, Supply and Delivery

Q1. *Is the scale of employment provision and its distribution in the Plan justified and consistent with the ACS? Would the modifications proposed by the Council have any effect on the scale of employment provision and its distribution in the Plan? If so, what would that effect be?*

4.30 ACS Policy 4 makes provision for:

4b)....a minimum requirement of 310,000 sq. m of new office with 253,000 sq. m. of this to be located in Nottingham City;

4d) ...joint working between the Councils to ensure that a sufficient supply of land for new and relocating industrial and warehouse uses is maintained in Part 2 Local Plans to provide a range and choice of sites up to 2028.....As a minimum 37 hectares will be identified with Nottingham City's share of the distribution being 12 hectares.

4e) promoting significant new economic development as part of sustainable urban extensions including the Boots Site.

4.31 The employment land provisions in the ACS are based on employment forecasts that convert jobs to land and floorspace requirements. The ACS at para 3.4.1 explains that over the ACS plan period to 2028, an increase of approximately 37,000 jobs is anticipated across Greater Nottingham.

4.32 Around half of the forecast jobs growth (18,000) is in the office sector and it is from this job forecast that the office floorspace figures were derived by using a job to floorspace multiplier to calculate floorspace requirements of 310,000 sq. m. for the three Councils of Broxtowe, Gedling and Nottingham City, with a City requirement of 253,000sqm.

4.33 The ACS provides for a minimum of 37 hectares across the plan area with Nottingham City's share being a minimum of 12 hectares.

4.34 Since the adoption of the ACS, Nathaniel Lichfield and Partners (NLP) was commissioned in 2015 to provide an updated employment land forecast ([LAPP-EMP-01](#)) which for Nottingham City Council forecasts similar office growth and forecasts a slower decline in manufacturing/warehousing jobs.

4.35 The NLP study led to a reassessment of the quantum of employment land and office floorspace and its distribution across the Greater Nottingham authorities, which is set out in the Strategic Distribution of Employment Land Requirements Background Paper [LAPP-CD-BACK-01](#).

4.36 The targets set out in parts (b) and (d) of Policy 4 of the ACS (albeit subsequently revised) are not additional to the strategic allocations set out in part (e) of Policy 4 (see response to question 4 below). Due to the Employment Land Study work ([LAPP-EMP-01](#)) updating the employment forecasts, the amount of employment land and floorspace being planned for in the ACS and the LAPP is different (see response to Question 2 for an explanation of the revised targets). The revised targets are:

- Broxtowe Borough - 15 hectares of industrial/warehousing and 34,000 sq. m of office
- Gedling Borough - 19 hectares of industrial/warehousing and 10,000 sq. m of office
- Nottingham City - 25 hectares of industrial/warehousing and 253,000 sq. m of office.

4.37 The scale of employment provision in the Plan is justified and broadly consistent with the above. The distribution of employment provision is still broadly consistent with the ACS. The modifications proposed by the Council are generally clarifications to development management policies and development principles, and do not by and large impact on the scale and distribution of development.

4.38 Employment land is allocated in accordance with the Spatial Strategy set out in Policy 2 of the ACS. As is the case of all development, distribution of employment development follows the ACS strategy of urban concentration with regeneration set out in ACS Policy 2.

Q2. *Have sufficient sites been allocated in the Plan to meet the provision of office floorspace (Use Classes B1(a&b) and other employment uses (Use Classes B1(c), B2 and B8) for Nottingham City set out in the ACS?*

4.39 Yes. The targets are established in the ACS but the Councils have agreed to work towards the revised targets set out in the Employment Background Paper ([LAPP-CD-BACK-01](#)) based on the NLP work which is considered more up-to-date and robust. The revised targets are consistent with delivering the economic objectives in the ACS by providing for the knowledge-based economy and office based jobs. For industrial and warehousing land a modest increase is planned bearing in mind the ACS requirements were based on minimum provision. Both office floorspace requirements and the need for industrial/warehouse land reflect the aspirations in the D2N2 LEP Strategic Economic Plan ([LAPP-EMP-05](#)). For Nottingham City, the revised targets require 13 more hectares of industrial and warehousing land (25 ha) and no change in the level of office provision i.e. 253,000 sq m.

4.40 As explained above, the Council is working to the revised distribution of employment land requirements agreed between the Greater Nottingham Authorities, in the Employment Background Paper 2016 ([LAPP-CD-BACK-01](#))

4.41 Policy EE1: Providing a Range of Employment Sites (and in more detail the table in Appendix 4 of the LAPP) sets out the employment land allocations. It is therefore demonstrated that the revised requirement for Nottingham City is met.

4.42 Employment land is allocated in accordance with the Spatial Strategy set out in Policy 2 of the ACS. ACS Policy 4 sets out how the economy of the area will be strengthened and diversified with new floorspace being provided across all employment sectors to meet restructuring, modernisation and inward investment needs with a particular emphasis on supporting Core and Science objectives.

4.43 Following on from considering take-up to 2018 there are Proposed Post Submission changes (PPSC16) which show take up 2011-18 of 20,166sqm for offices and 2.5 hectares for industry and warehousing. In respect of office floorspace, the ACS figure is 253,000. When the Gross Internal Area of completions between 2011 and 2018 (20,166sqm) are factored in, the requirement to 2028 is 226,534. The Local Plan allocations allow for between 182,100 and 290,200, the mid- range for which is

236,150, some 9,616 above the ACS requirement. The requirement after deducting take-up 2011-18 (2.5 hectares) is 22.5 hectares for industry and warehousing, and therefore there is a small over provision of 0.65 hectares.

- 4.44 The Employment Land Forecasting Study ([LAPP-EMP-01](#)) identifies some vacancies in a number of the industrial estates meaning space is also available within existing employment areas, providing an additional buffer.

Q3. *Is it justified to include sites capable of mixed use development in the overall employment provision indicated within the Plan?*

- 4.45 Yes. It is considered justified to include sites capable of mixed use development in the overall employment provision indicated within the Plan in line with para 91, 188 and 129 of the 2012 NPPF. Mixed use designation is common in Local Plans, especially for large City Centre sites. Capacities for the employment element of mixed use on sites were specifically addressed by using figures from extant planning permission and, in other cases, making informed judgments in cooperation with DM, Regeneration and Property colleagues (using similar schemes) as to how the full quantum of development could be achieved. Therefore mixed use proposals are justified and will be effective.

- 4.46 Consultee 3223 made representations specific to the eastern part of PA70 Queens Road, that it should not be mixed use due to viability constraints on the site, and instead promoted a single storey supermarket. Whilst an element of retail on the ground floor would be welcomed as part of any scheme, the site is at a prominent location on the corner of London Road and Queens Road, within a conservation area. The position made in the representations regarding the viability of employment uses is not accepted, as there are several proposals for office use close to the station which either have planning permission (PA69 Station Street/Carrington Street) or where there is strong and credible interest (PA68 Island Site (planning application), PA71 Canal Quarter - Sheriff's Way, Sovereign House (planning application imminent)). It is understood that the eastern part of the site is currently being marketed.

Q4. *What are the assumptions about the scale and timing of supply and the rates of delivery? Are these assumptions realistic? What evidence is there to support these assumptions?*

- 4.47 The assumptions about scale and timing of delivery are based on planning permissions or site specific knowledge/judgment where there is no more specific information (particularly for the scale of office floorspace anticipated). For Industry and Warehousing, the site hectarage is given. Of the 27 sites allocated for employment uses, around two-thirds have (or have had) the benefit of planning permission for employment uses, or there is a decision pending. Further information is available in the Site Delivery Schedule ([LAPP.NCC30](#)).

- 4.48 Further detail can be found below in Table 1 and Table 2.

Table 1 - Scale, Timing and Delivery of Employment Sites (office floorspace sqm)

| Site Ref & Site Name | Minimum Approx office net gain in sqm | Maximum Approx office net gain in sqm | Mid-point | Planning Status | Revised Delivery sqm *No subsequent planning activity, mid-point applied | Delivery Notes |
|--------------------------------|---------------------------------------|---------------------------------------|-----------|----------------------------------|---|--|
| PA02 Blenheim Lane | 4,800 | 4,800 | 4,800 | Full Permission 13/03051/PFUL3 | 4,300 | Planning permission granted, all pre commencement conditions discharged, technical commencement. |
| PA47 Abbey Street/ Leen Gate | 5,000 | 8,000 | 6,500 | n/a | 6,500* | Site is an Enterprise Zone in recognition of its potential to contribute to provision of health and science facilities connected to the QMC. There is potential for ancillary residential development on site and supporting uses such as hotel. Delivery anticipated late in the Plan period. |
| PA49 NG2 West - Enterprise Way | 13,000 | 15,000 | 14,000 | Outline Permission 16/00526/POUT | 14,336 | Site is considered deliverable forming part of the NG2 prestige employment site. The site has benefits from an outline application for development of offices B1a, restaurant/café A3, or hotel C1 or Car Showroom (Sui Generis), including landscaping, service yards, car parking and vehicular/pedestrian access. Delivery anticipated to commence 2021. |
| PA50 NG 2 South – Queens Drive | 10,000 | 12,000 | 11,000 | n/a | 11,000* | Site is considered deliverable and forms part of the NG2 prestige employment site. The site has previously benefited from a longstanding outline planning application for development of site to include business park, leisure centre and retail unit, together with, highway, car parking and landscape infrastructure. The Council is anticipating receipt of a new request for pre-application advice to come forward imminently. Delivery anticipated to commence circa 2022/23. |

| Site Ref & Site Name | Minimum Approx office net gain in sqm | Maximum Approx office net gain in sqm | Mid-point | Planning Status | Revised Delivery sqm *No subsequent planning activity, mid-point applied | Delivery Notes |
|--|---------------------------------------|---------------------------------------|-----------|---|---|--|
| PA52 University Boulevard - Nottingham Science and Technology Park | 9,000 | 9,000 | 9,000 | Full Application (Pending Consideration) 17/02866/PFUL3 | 9,000 | Site forms part of Nottingham Science and Technology Park, with Enterprise Zone status. The site is deliverable and benefits from full planning application, currently under consideration, for three storey building providing undercroft parking, cafe, conference and meeting space at ground floor, with office space above, which applies to phase 1 of proposed wider development onsite and covers approximately 25% of the site area. Delivery anticipated to commence 2020. |
| PA53 Electric Avenue | 4,400 | 4,400 | 4,400 | n/a | 4,400* | Site falls within an area of other major office building developments and provides projected opportunities for positive impacts for the Employment objectives. New owners have indicated an employment led scheme will be progressed. Delivery anticipated to commence circa 2022/23. |
| PA54 Boots | 2,500 | 6,500 | 4,500 | Outline Application (subject to S106) 14/02038/POUT | 4,500* | Deliverable strategic brownfield site with enterprise zone status. Outline Planning application approved subject to S106, mixed use scheme including B1a, B1b, B1c, B2 and B8. Includes land in Broxtowe Borough. Full application for site and public infrastructure works including highways, new canal bridge currently being implemented. Planning permission for further access works. Phased delivery commencing approx. 2021 to end of plan period. |
| PA61 Royal Quarter- Burton | 10,000 | 20,000 | 15,000 | n/a | 15,000* | It is a City Council owned site with an agreement in place with a developer for a mixed use scheme including |

| Site Ref & Site Name | Minimum Approx office net gain in sqm | Maximum Approx office net gain in sqm | Mid-point | Planning Status | Revised Delivery sqm *No subsequent planning activity, mid-point applied | Delivery Notes |
|---|---------------------------------------|---------------------------------------|-----------|---|---|--|
| Street, Guildhall, Police Station and Fire Station | | | | | | offices, hotel and student housing. Pre-lets are currently being secured and contracts have been exchanged with the hotel operator. Delivery of employment element anticipated to commence circa 2024. |
| PA65 Creative Quarter - Bus Depot | 0 | 5,000 | 2,500 | n/a | 2,500* | Site is part owned by Nottingham City Council and part owned by a Bus operator. Discussions ongoing for the development of a convention centre on site, which is a priority development following the completion of the Broadmarsh developments. Relocation options under assessment with discussions by all parties regarding the relocation of the bus depot. Delivery towards the end of the Plan period. |
| PA66 Castle Quarter, Maid Marian Way - College Site | 5,500 | 10,000 | 7,750 | n/a | 7,750* | Current occupier (Nottingham College) relocating to new Broadmarsh East in 2020, following which development of this site is anticipated to come forward. Land exchange with the City Council underway. Masterplanning in progress. Delivery anticipated to commence circa 2024. |
| PA68 Canal Quarter - Island Site | 43,900 | 64,400 | 54,150 | Outline Application (Pending Consideration) 18/01354/POUT | 58,885 | Outline planning application is currently under consideration for All matters reserved. Proposal includes 58,885 sqm of office space (B1). Target Committee date of early 2019. Delivery anticipated to be phased form 2022. |
| PA69 Canal Quarter - Station | 9,000 | 9,000 | 9,000 | Full Permission (Part of Site) | 5,832 | Proposed five-storey office building with associated undercroft. Discharge of conditions commenced. |

| Site Ref & Site Name | Minimum Approx office net gain in sqm | Maximum Approx office net gain in sqm | Mid-point | Planning Status | Revised Delivery sqm *No subsequent planning activity, mid-point applied | Delivery Notes |
|--|---------------------------------------|---------------------------------------|-----------|----------------------------------|---|--|
| Street/ Carrington Street | | | | 18/00916/PFUL3 | | Delivery anticipated to commence 2021. |
| PA70 Canal Quarter - Queens Road, East of Nottingham Station | 5,000 | 15,000 | 10,000 | n/a | 10,000* | Brownfield site located on a prominent location in the City Centre. Active discussions are ongoing with Network Rail who own western part of the site for residential. Eastern part of the site currently being marketed. Significant number planning inquiries have been received. Delivery of office element anticipated to commence 2025. |
| PA71 Canal Quarter - Sheriffs Way, Sovereign House | 21,000 | 21,000 | 21,000 | Outline Permission 14/00674/POUT | 21,000 (net) | Demolition of the site complete. Outline planning permission for Demolition of existing buildings and erection of mixed use development comprising up to 27,000sq.m offices B1a. Developers are currently seeking pre-lets. New hybrid planning application imminent. Delivery anticipated to commence 2022. |
| PA72 Canal Quarter - Waterway Street | 0 | 9,100 | 4,550 | n/a | 4,550* | Part of site benefits from planning permission for student development. Delivery of office development dependent on suitable scheme, delivery anticipated towards the end of the Plan period. |
| PA73 Canal Quarter - Sheriffs Way/Arkwright Street | 7,000 | 7,000 | 7,000 | 17/01370/PFUL3 | 7,000* | Southern part of site now benefits from planning permission for student development. Planning permission for change of use to Offices (B1) of building in the north of the site being implemented. Early |

| Site Ref & Site Name | Minimum Approx office net gain in sqm | Maximum Approx office net gain in sqm | Mid-point | Planning Status | Revised Delivery sqm *No subsequent planning activity, mid-point applied | Delivery Notes |
|--|---------------------------------------|---------------------------------------|-----------|-----------------|---|--|
| | | | | | | discussions with owner of central portion of the site. Delivery of remaining offices late in the Plan period. |
| PA74 Canal Quarter – Arkwright Street East | 5,000 | 10,000 | 7,500 | n/a | 7,500* | Much of the site owned by the City Council. Land to west of the tram line included in forward programme of office development. Delivery anticipated to commence circa 2025. |
| PA76 Waterside - London Road, Former Hartwells | 10,000 | 19,000 | 14,500 | n/a | 14,500* | Temporary planning permission for D1 Education and Training Centre for a Temporary Period of 5 Years (ends Dec 2022). Previous outline planning permission for up to 18,775m2 of office floorspace (Class B1). Current use considering relocation options. Delivery anticipated late in the Plan period. |
| PA77 Waterside - London Road, Eastcroft Depot | 0 | 5,000 | 2,500 | n/a | 2,500* | Nottingham City Council owned site with development expected to be sought once decisions have been made regarding rationalisation of existing uses. Delivery anticipated to commence circa 2025. |
| PA78 Waterside - London Road, South of Eastcroft Depot | 1,000 | 1,000 | 1,000 | n/a | 1,000* | Application granted on appeal for Vehicle Rental use and 100sqm office on southern portion of the site. Remainder of site available as part of PA77 Eastcroft Depot. |
| PA81 Waterside - Meadow Lane | 0 | 3,000 | 1,500 | n/a | 1,500* | Small scale office provision as part of redevelopment of the Waterside area. Delivery anticipated late in the Plan period. |
| PA82 Waterside - Freeth Street | 0 | 3,000 | 1,500 | n/a | 1,500* | Small scale office provision as part of redevelopment of the Waterside area. Delivery anticipated late in the Plan period. |

Table 2 - Scale, Timing and Delivery of Employment Sites (Industry/warehousing hectarage)

| Site Ref & Site Name | Minimum net gain in hectares | Maximum net gain in hectares | Planning Status | Revised Delivery sqm *No subsequent planning activity, mid-point applied | Delivery Notes |
|---|------------------------------|------------------------------|---|---|--|
| PA02 Blenheim Lane | 2.0 | 2.0 | Full Permission 13/03051/PFUL3 | 2.0 | 7,800m2 Manufacturing Facility Building. Planning permission being implemented. |
| PA07 Hucknall Road – Southglade Food Park | 0.85 | 0.85 | n/a | 0.85 | Cleared site in ownership of the City Council. Final phase of a successful food technology park. Delivery anticipated to commence circa 2023, subject to funding. |
| PA11 – Stanton Tip | 5.0 | 10.0 | n/a | 7.5 | Part of a wider housing led development on this strategic brownfield site. Delivery anticipated towards the end of the Plan period. Sale of NCC land to owner of remainder of the site due to complete imminently. |
| PA23 Radford Road Former Gasworks | 1.6 | 2.0 | 12/02756/PFUL3 Expired planning permission | 2.3 | Considered to be deliverable. Previous planning permission expired in January 2018, due to the owner of the site going into receivership. However, discussions are ongoing with the current owners. The City Council is currently progressing the declassification of the nearby disused gas cylinders, anticipated by the end of the year. Delivery anticipated to commence circa 2023. |
| A54 Boots | 5 | 15 | Outline Application (subject to S106) 14/02038/POUT | 10 | Deliverable strategic brownfield site with enterprise zone status. Outline Planning application approved subject to S106, mixed use scheme including B1a, B1b, B1c, B2 and B8. Includes land in Broxtowe Borough. Full application for site and public infrastructure works including highways, new canal bridge currently being implemented. Planning permission for further access works. Phased delivery commencing approx. 2021 to end of plan period. |

Issue 6: City, Town, District and Local Centres

Q1. Is the hierarchy of centres identified within the Plan consistent with the ACS?

4.49 Yes. The ACS sets out a hierarchy of town centres at Policy 6, and the LAPP repeats this at para 3.83, with the addition of “Centres of Neighbourhood Importance” (CONIs) which the ACS explains will be designated through Part 2 Local Plans.

Q2. Are the boundaries of the City Centre, Town Centres, District Centres and Local Centres appropriate and justified?

4.50 The boundaries of the centres identified in the LAPP are considered appropriate and justified. They have been subject to review as part of the LAPP preparation process, the approach to their definition is set out in the Retail Background Paper 2016 ([LAPP-CD-BACK-10](#)), which sets out the evidential base, which includes:

- Broxtowe, Gedling, Nottingham City and Rushcliffe Retail Study (Carter Jonas 2015) ([LAPP-RETAIL-01](#))
- The Nottingham City Centre Time and Place Plan ([LAPP.NCC20](#))
- Nottingham City Local Retail Centres Survey (2009), Summary Report March 2010 ([LAPP-RETAIL-07](#))
- Local strategies, where relevant

4.51 The boundaries of the centres have been subject to extensive consultation, including specific questions in the Issues and Options consultation stage ([LAPP-NONSTAT-01](#) - page 25). Limited representation was received on the centre boundaries during the LAPP preparation (only from the Cooperative Group 3704 and 4570 in relation to the CONI boundary at PA39 Carlton Road, where the CONI boundary was changed for the Revised Publication version of the LAPP).

Q3. Is the approach to the identification of the Primary Shopping Areas appropriate, justified and consistent with the Framework and the policies of the ACS? Would the modification proposed by the Council to the City Centre Primary Shopping Area address any shortcomings in these respects?

4.52 The 2012 NPPF 2012 requires planning policies to define the extent of town centres and primary shopping areas (PSAs) It defines these as areas where retail development is concentrated, generally comprising primary shopping frontages and some secondary shopping frontages. The 2018 NPPF simplifies this definition by stating that PSA are defined areas where retail is concentrated.

4.53 For the City Centre, the PSA is the retail core, and relies on much of the same evidential base as set out at para 4.45 above (in particular the City Centre Time and Place Plan) ([LAPP.NCC20](#)), and para 7.10 to 7.13 of the Retail Background Paper ([LAPP-CD-BACK-10](#)). The PSA has also been subject to consultation at every stage of LAPP preparation. Whilst no representations were received in respect of the PSA, a Submission Change (SC167) is proposed to exclude the Eastern part of PA67, which is the location of a new Nottingham College (Skills Hub), to reflect the fact that the new use effectively precludes retail use.

4.54 In line with the 2012 NPPF, other defined centres also include PSAs, and these have been based on local knowledge and survey of the centres themselves to identify which those areas where retail is concentrated, informed by the defined primary shopping frontages (See Q4 below).

Q4. Is the approach to the identification of the primary frontages justified, effective and consistent with the Framework and the policies of the ACS? How were the primary frontages defined? Are the identified primary frontages justified and effective? Would the modification proposed by the Council to the City Centre primary shopping frontage (Colin Street and around the Clock Tower at Intu Victoria Centre) address any shortcomings in these respects?

4.55 The 2012 NPPF requires a clear definition of PSF on which to base centre boundaries and the PSA. It defines PSA as likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods.

4.56 The LAPP includes PSFs in line with the 2012 NPPF and Policy 6.2 of the ACS, and these sit within the defined PSAs of each centre. As with the PSAs, these are based on local knowledge and survey of the centres themselves, as well as the evidence in para 4.45 where this is relevant such as paras 15.9 to 15.12 of the Broxtowe, Gedling, Rushcliffe and Nottingham Retail Study, 2015 ([LAPP-RETAIL-01](#)), and paras 7.14 and 7.15 of the Retail Background Paper ([LAPP-CD-BACK-10](#)).

4.57 Representations have only been made on the City Centre PSF, by Intu Properties (NLP) 3160 at Publication Stage. INTU Properties sought changes to the PSF based on the make up of uses (Reps 4326, 4327 and 4328). The Council accepted that these were sensible suggestions, and they were subsequently incorporated into the Revised Publication Version, and assist in and making the PSF justifiable and more effective.

Q5. Do the retail development proposals in the Plan accord with the overall strategy for retail development in the ACS?

4.58 Yes. The retail strategy in the ACS is linked to the hierarchy of centres set out in ACS Policy 6, and for the City Centre, Policy 5. In particular, Policy 5 states that the City Centre will be promoted as the region's principal shopping, leisure and cultural destination. Accordingly, the LAPP provides for this, with a focus on the two "anchor" sites – Intu Victoria and Intu Broadmarsh. Both have planning permission, Intu Victoria for a significant increase in retail floorspace, and Intu Broadmarsh for a more leisure orientated redevelopment. The ACS therefore states that once these schemes are committed, retail development elsewhere in the City centre will focus on refurbishment, rationalisation and consolidation.

4.59 The LAPP provides for other retail opportunities within the City. The allocations above 1,000 sqm are listed below, together with their current status:

- PA4 Linby Street Filey Street - Edge of Bulwell Centre, now implemented (Lidl).
- PA16 Woodhouse Way - Out of Centre, now implemented (Aldi).
- PA21 Mansfield Road - In Sherwood centre.
- PA23 Radford Road - Basford Gasworks – Edge of Centre, planning permission.
- PA34 Beechdale Baths - Out of Centre – specifically identified to serve local qualitative deficiency in Western Estates. Application imminent.
- PA39 Carlton Road, Former Coop - Centre of Neighbourhood Importance, reuse/redevelopment of existing unit.
- PA 58 Green Lane - Edge of Clifton Centre, implemented, to support major urban extension in Rushcliffe Borough and to enhance the centre.
- PA60 INTU Victoria Centre - City Centre, planning permission.
- PA68 Island Site – Edge of centre, but retail only permitted to support the needs of large scale redevelopment, planning application under consideration.

- 4.60 The retail proposals of the LAPP are therefore considered to be consistent with the overall strategy for retail development in the ACS.

Issue 7: Approach to Site Allocations.

Q1. What is the policy context provided by the ACS in terms of potential site allocations to meet the development needs of Nottingham?

- 4.61 Policy 2 (The Spatial Strategy) of the ACS sets the policy basis in terms of potential site allocations to meet the development needs of Nottingham City. It states that sustainable development in the plan area will be achieved through a strategy of urban concentration with regeneration. The policy therefore aims to locate most development in or adjoining the built up area of Greater Nottingham, with development adjacent to the Sub Regional centre of Hucknall. In addition, further key settlements where significant growth is planned are identified.
- 4.62 Policy 2 also sets out the minimum number of homes to be provided in each of the local authority areas during the plan period. For Nottingham City, a number of strategic sites are identified: Stanton Tip, Boots Site and the Waterside Regeneration Zone. These are all strategic locations and the ACS clearly states that these will be allocated through Part 2 Local Plans.
- 4.63 Furthermore, Policy 2 also sets out the locational requirements for retail, health, social, leisure and cultural development, along with major new transport infrastructure and strategic green infrastructure.
- 4.64 The Spatial Strategy flows from the spatial portrait, the vision and the spatial objectives of the ACS. It has been established that the spatial strategy of urban concentration is considered to be the most appropriate strategy for the area. This is because it makes the most of existing infrastructure and because of the significant regeneration challenges faced by parts of the plan area, especially in the main built up area of Nottingham City itself, where many of the brownfield development opportunities lie. The strategy also performed well in the Sustainability Appraisal process and was originally proposed through the East Midlands Regional Plan.

Q2. Is the approach to site allocations consistent with the policy context provided by the ACS.

- 4.65 Yes. The approach to site allocations is consistent with the policy context provided by the ACS. All of the strategic sites set out in Policy 2 that fall within Nottingham City have been put forward as site allocations in the LAPP. The minimum housing provision requirements have been adhered to and enough sites have been allocated to deliver requirements (please refer to Matter 4, Issues 1, 2 and 3 for detailed justification on this point) and realise the City Council's regeneration ambitions. In line with the ACS, the housing provision elements of the site allocations are through existing deliverable sites, whilst the strategic locations at the Waterside and Stanton Tip are recognised as taking longer to deliver their full potential, so house building there is not expected early in the plan period.
- 4.66 Retail, health, social, leisure and cultural development is located in the City Centre allocations as set out in Policy 5 of the ACS and the retail hierarchy set out in Policy 6 is embodied in all of the site allocations. Major new transport infrastructure has been denoted on the Policies Map and taken into account in the site allocations and

consequent development principles where applicable. In addition, there is a strong focus in site allocations on economic development in the City Centre and the “Regeneration Zones” (now referred to as the Waterside and the four City Centre Quarters in the LAPP), and on key sites such as the Enterprise Zone, which includes the strategic site at the Boots campus and existing employment sites at such as Nottingham Science Park.

4.67 In line with the ACS, site allocations in Nottingham City Centre (particularly the City Centre Quarters) provide a focus for new office development.

Q3. How were the proposed site allocations identified?

4.68 Potential allocations were identified from a number of sources to form a “long list” of possible options. It should be noted that there was some duplication on sites between sources and that these sources included:

- **The Saved Nottingham Local Plan (2005)** - The Local Plan (2005) includes a number of site allocations which had not been implemented. The site assessment process reviewed the suitability of including these sites in the LAPP.
- **The Greater Nottingham Aligned Core Strategy (2014)** - The Core Strategy identifies three strategic locations for growth to be taken forward in the Local Plan Part 2.
- **City Council Development Options** - Options put forward by City Council Colleagues.
- **Nottingham Core Housing Market Area Local Investment Plan** - This document includes investment priorities in terms of housing supply, housing quality, inclusion and neighbourhoods across Greater Nottingham.
- **Employment Land Database** - A database containing information on all existing and future employment sites (including allocations and sites with planning permission).
- **“Call for Sites”** - A “Call for Sites” was undertaken between 7th June 2010 and 19th July 2010. This sought information from the development industry and colleagues on sites which they considered suitable for future allocation.
- **Issues and Options: 2011** - Building on the original “all for Sites”, the Issues and Options consultation sought responses on any omitted sites with the potential to be site allocations. During this phase, a number of additional sites were put forward as additional potential allocations. These sites underwent consultation in March 2012.
- **Preferred Options: 2013** - This provided a further opportunity to identify additional further sites. As a result consultation took place on two additional sites in August and October 2014 respectively.
- **Publication: January 2016**- This phase provided an opportunity for comments and new information on sites.
- **Revised Publication: September 2017** – This stage incorporated new information on sites which indicated that some sites would not be deliverable.
- **Strategic Housing Land Availability Assessment (SHLAA)**: This provides an up to date record of sites that are considered suitable for housing.

Q4. Was the identification process robust?

4.69 Yes, the identification process was robust. The City Council took every opportunity to identify new sites at the outset of, and during, the plan preparation stages. All proposed sites have been subject to consultation and this is detailed in the various Reports of Consultation prepared alongside the LAPP. Appendix 1 of the Site

Assessment Background Paper (January 2016) ([LAPP-CD-BACK-04](#)) sets out a comprehensive list of all sites considered at each stage of the plan preparation.

Q5. What factors were taken into account in the assessment process to determine the sites for allocation, was the assessment robust and why were the alternatives not pursued?

4.70 The Site Assessment Background Paper (January 2016) ([LAPP-C D-BACK-04](#)) sets out the methodology for establishing which sites should be allocated for development in the LAPP.

4.71 A two stage site assessment process has been undertaken for every site, the first stage comprising a site sieving exercise to assess:

- whether the site was less than 0.5 hectares (it is considered that sites above this size will make a significant cumulative contribution to meeting the requirements of the ACS. Their allocation provides a clear commitment to meeting the ACS requirements over the plan period. It is however, acknowledged that smaller sites are still important and the LAPP provides policy guidance for their development whilst avoiding allocation of an excessive number of sites where individual site delivery is not critical to the success of the plan. For residential development, all potential sites regardless of size are included in the SHLAA);
- whether the site was likely to come forward before the production of the DPD;
- whether there was no need for allocation as there was no change of use proposed;
- whether there was no reasonable chance of the site being delivered within the plan period due to known constraints; and
- whether there was no known developer / regeneration interest in taking the site forward during the plan period (also taking into account the regeneration and investment priorities of the City Council).

4.72 In the above cases, further assessment of sites was not undertaken and the site was not proposed for allocation.

4.73 Following on from this, a more detailed assessment was then undertaken on remaining sites which included site visits, desk-based assessments and consultation with key stakeholders such as pollution control, highways, Heritage England, Natural England, the Environment Agency, site owners and developers.

4.74 Information used to inform the assessment included:

- Site assessment (assessment of physical site characteristics e.g. planning status, existing land use, site constraint information such as flood risk, heritage designations and contamination, transport and accessibility information, wider regeneration benefits consideration, infrastructure information, potential for local energy and heat networks, existing development briefs, deliverability information etc.);
- Green Belt Assessments;
- Sustainability Appraisal;
- Equalities Impact Assessment; and
- ACS and 2012 NPPF.

4.75 The Site Assessment Background Paper (January 2016) and Addendums ([LAPP-CD-BACK-04](#), [LAPP-CD-BACK-05](#), [LAPP-CD-BACK-06](#)) provide all of the Site

Assessment Forms and “Overall Conclusion” tables showing the results of all of the different strands of the assessments undertaken for each site.

4.76 In terms of the alternatives proposed, the Inspector is referred to the Overall Conclusions Table in Section 4 of The Site Assessment Background Paper Addendum 2 (March 2018) ([LAPP-CD-BACK-05](#), [LAPP-CD-BACK-06](#)), which is the most up-to-date version of this table (with previous versions in [LAPP-CD-BACK-04](#), [LAPP-CD-BACK-05](#)). This table sets out all of the sites not taken forward (numbered A1 to A22) and details the reason for this in every case. The reasons vary from access issues, existing viable and active uses present, flood risk issues, merging of site boundaries, negative impacts on open space and biodiversity, loss of allotments, inappropriate uses proposed and low scores in terms of the Sustainability Appraisal. There are a further 8 sites (numbered B1 to B8) which were not taken forward and not subject to Sustainability Appraisal due to them being below the 0.5 hectares or having being fully or partially built out.

Q6. *In terms of its overall approach to the scale and distribution of development and the allocation of sites, has the Plan been positively prepared? Is it justified and effective and is it consistent with national policy in the context of the ACS?*

4.77 The City Council considers that in terms of the overall approach to the scale and distribution of development and the allocation of sites, the LAPP has been **positively prepared**. The ACS preparation process objectively assessed the need for jobs, homes and infrastructure and set out a Spatial Strategy approach in Policy 2 aimed at urban concentration and regeneration in order to promote sustainable development in the plan area. The LAPP upholds the Spatial Strategy approach with regards to the distribution of development and allocates sites in accordance with the scale of development set out in the ACS. Table 5 and Table 6 of the Submission version LAPP ([LAPP-CD-REG-01](#)) detail the contribution that the LAPP will make to the delivery of housing and employment provision required by the ACS and Appendices 3,4 and 5 set out the quantum of housing, employment and retail development that is anticipated to be delivered by the LAPP, which is in line with the requirements of the ACS.

4.78 Furthermore the overall approach to the scale and distribution of development and the allocation of sites is considered to be **justified** as the City Council drew on a number of sources to first of all identify site allocations and then proceeded to perform detailed site assessments for each site put forward (and not sieved out in the first stage of the site assessment process).

4.79 The City Council believes that the overall approach to the scale and distribution of development and the allocation of sites is **effective** as it will deliver the quantum of development required by the ACS. In terms of housing, the Housing Land Availability Report ([LAPP.NCC 31](#)) sets out very clearly how housing is already being delivered above the ACS targets. Furthermore, Appendices 3, 4 and 5 of the Submission version of the LAPP break down the quantum of development to be delivered by the site allocations. In addition, the City Council has prepared a Site Delivery Schedule ([LAPP.NCC30](#)) to keep track of the status and delivery of all of the site allocations.

4.80 It should also be highlighted that the City Council has looked thoroughly at the deliverability of sites throughout the LAPP preparation process and made changes to sites as new information has emerged. The Revised Publication stage of the LAPP (an extra preparation stage put forward by the City Council) is testament to the rigor

that has been applied to checking deliverability information on sites, making adjustments as required and also in inviting input into the Plan and its approach to the scale and allocation of sites.

- 4.81 The overall approach to the scale and distribution of development and the allocation of sites in the LAPP is **consistent** with national policy in the context of the ACS. In accordance with the 2012 NPPF Para 157, the LAPP allocates sites to promote development and the flexible use of land, bringing forward new land where necessary and provides detail on the form, scale, access and quantum of development, the latter of which is set out in the ACS.

Issue 8: Site Allocations (Policy SA1)

- Q1. Are the site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?**
- Q2. Are there any significant factors that indicate that any sites/parts of any sites should not have been allocated? What factors led to the proposed modification to delete allocation PA22 and amend the boundary of allocation PA85?**
- Q3. Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery? Are the sites viable and deliverable?**
- Q4. How were the site areas and capacities in terms of the various types of development determined? Are the assumptions regarding capacity and delivery justified and based on available evidence? Would the modifications proposed by the Council address any shortcoming in these respects?**
- Q5. How were the proposed uses and development principles for the allocated sites identified? What factors were taken into account? Are the proposed uses and development principles for the allocated sites effective and justified? Would the modifications proposed by the Council address any shortcoming in these respects?**

The Council is requested to address questions 1 – 5 above for all of the site allocations identified in policy SA1 (see Appendix 1).

- 4.82 Answers to these questions can be found in [Appendix A](#) (separate document due to its size).

In addition, for those sites where representations have been made, the Council is requested to respond to the particular issue(s) raised. In doing this any updated information regarding the planning and development status of the sites and existing uses should be included.

- 4.83 The Council's responses to particular issue(s) raised for sites where there are representations are provided in [Appendix B](#) (separate document due to its size). Any updated information regarding the planning and development status of the sites and existing uses can also be found in [Appendix A](#).

Proposed Post Submission Changes as a Result of this Statement

- 4.84 For completeness, listed below are all the Proposed Post Submission Changes as a result of this statement.

| PPSC number | Para Ref/Policy | Proposed Post Submission Change |
|-------------|-----------------|---|
| PPSC14 | Para 4.64g | <p>Add a subheading before Para 4.64g</p> <p><u>“Gypsies and Travellers and Travelling Showpeople Need”</u></p> <p>And amend the text in Para 4.64g to read</p> <p>“...The most likely locations to meet this need will be allocated mixed-use sites which have good access to the strategic road network and which meet the criteria of Core Strategy Policy 9. <u>Small scale infill and possibly small scale site extensions are considered to be the most appropriate form of provision, which will assist in integrating gypsy and traveller and travelling showpeople sites into local communities.</u> The City Council will continue...”</p> |

PPSC15: These changes update the housing figures to include take-up to 31st March 2018, reflect planning permissions and reassessments of sites

| Main Section Ref Point Para/ Section | Page of Submission Doc | Details and reason | Proposed Changes |
|--|------------------------|------------------------------|--|
| Making it Happen SA1 Justification 6.12a | 186 | Update 5 year supply to 2018 | Based on the 2017 8 Housing Land Availability Report the City currently has 6.84 <u>7.42</u> years supply of deliverable sites using the 'Liverpool' approach and 6.94 <u>7.87</u> Using the 'Sedgefield' approach. The Housing Land Availability Report 2017 8... |
| Making it Happen SA1 Justification 6.12d | 186 | Update figs to 2018 | Between 2011 and 2017 8 <u>4,627</u> <u>6,020</u> homes have been completed, leaving a requirement of 42,523 <u>11,130</u> . This corresponds with the number anticipated in the Core Strategy up to 2017 8 (4,470 <u>5,350</u>). |

| Main Section Ref Point Para/ Section | Page of Submission Doc | Details and reason | Proposed Changes |
|--|------------------------|----------------------------|--|
| <p>Making it Happen SA1 Justification Table 5</p> | <p>187</p> | <p>Update figs to 2018</p> | <p>Replace: 2011 – 17 Core Strategy Requirement 4,470 2017 – 28 Core Strategy Requirement 12,680 Total Core Strategy Requirement 17,150</p> <p>Housing Delivery to 31st March 2017 4,627 Total remaining requirement 2017 – 28 12,523 Allocated in LAPP from 2017 7,857 SHLAA sites below 0.5 hectares 2017 – 28 4,810 Windfalls 2017 – 28 1,815 Demolitions 2017 – 28 342 Potential delivery 2017 – 28 14,140 Total potential delivery over plan period 2011 – 28 18,767</p> <p>with:</p> <p><u>2011 – 18 Core Strategy Requirement 5,350</u> <u>2018 – 28 Core Strategy Requirement 11,800</u> <u>Total Core Strategy Requirement 17,150</u></p> <p>Housing Delivery to 31st March 2018 6,020 Total remaining requirement 2018 – 28 11,130 Allocated in LAPP from 2018 8,101 SHLAA sites below 0.5 hectares 2018 – 28 4,180 Windfalls 2018 – 28 1,785 Demolitions 2018 – 28 300 Potential delivery 2018 – 28 13,766 Total potential delivery over plan period 2011 – 28 19,786</p> |
| <p>Making it Happen SA1 Justification 6.12f</p> | <p>187</p> | <p>Update figs to 2018</p> | <p>The sites allocated in this Local Plan could accommodate some 7,857 <u>8,101</u> dwellings between 2017<u>8</u> and 2028. An additional 4,810 <u>4,180</u> dwellings are predicted on other SHLAA sites, deliverable by 2028 and 1,815 <u>1,785</u> dwellings are expected to be built on “windfall sites”, the location of which is not yet known. 342 <u>300</u> demolitions are predicted between 2017<u>8</u> and 2028.</p> |

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| <p>Making it Happen SA1 Justification 6.12g</p> | 187 | Update figs to 2018 | <p>From 2011 to 20178 there has been an over-provision of 157 670 dwellings, 3.5 <u>12.5%</u> above the Core Strategy requirement for this period. The total potential housing delivery including Local Plan allocations is therefore 44,140<u>13,766</u> dwellings from 20178, this represents a potential over-provision of 4,617<u>2,636</u> or 12.9<u>23.7%</u> of the remaining 42,523<u>11,130</u> Core Strategy requirement. Therefore taking the plan period as a whole (2011-2028) there is the potential for 4,617<u>2,636</u> dwellings above the Core Strategy requirement, or 9.4 <u>15.4%</u>, which is considered a generous buffer for non-delivery. <u>If the minimum predicted dwellings are developed on each Local Plan site during the plan period (i.e. 7,447) then there is the potential for 1,982 dwellings above the Core Strategy requirement, or 11.6%, which is also considered a generous buffer for non-delivery.</u></p> |
| <p>Appendix 3 Table A3.1</p> | 307 | Update figs to 2018 to reflect reassessment - at detailed design stage it was discovered that the topography is not as prohibitive as previously anticipated. | <p>PA03 Eastglade, Top Valley - Former Eastglade School Site Birkdale Way 44 64 44 64 44 64</p> |
| <p>Appendix 3 Table A3.1</p> | 307 | Update figs to 2018 | <p>PA09 Edwards Lane - Former Haywood School Detached Playing Field Edwards Lane 85 100 115 100 100</p> |
| <p>Appendix 3 Table A3.1</p> | 307 | 150 dwellings considered to be developed beyond the plan period to take account of potential complex site delivery | <p>PA11** Stanton Tip - Hemps Hill Vale Hemps Hill Vale 500 350 500 350 500 350</p> |
| <p>Appendix 3 Table A3.1</p> | 308 | Update figs to reflect take-up to 2017 | <p>PA15 *** Bulwell Lane - Former Coach Depot Land off Bulwell Lane 32 24 32 24 32 24</p> |

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| Appendix 3 Table A3.1 | 308 | Update figs to reflect take-up to 2018 | PA17 ****Woodhouse Way - Woodhouse Park Land Off Woodhouse Way 442 <u>52</u> 442 <u>52</u> 442 <u>52</u> |
| Appendix 3 Table A3.1 | 308 | Update figs to detailed designs | PA24 College Way - Melbury School Playing Field College Way 40 <u>55</u> 50 <u>55</u> 45 <u>55</u> |
| Appendix 3 Table A3.1 | 308 | Update figs to reflect planning permission | PA26 Denewood Crescent - Denewood Centre Denewood Crescent 90 <u>100</u> 120 405 <u>110</u> |
| Appendix 3 Table A3.1 | 309 | Update figs to reflect take-up to 2018 | PA33 ****Chalfont Drive - Former Government Buildings Robin's Wood Road 433 <u>324</u> 433 <u>324</u> 433 <u>324</u> |
| Appendix 3 Table A3.1 | 309 | Update figs to reflect planning permission | PA35 Woodyard Lane - Siemens Lambourne Drive 80 <u>110</u> 400 <u>110</u> 90 <u>110</u> |
| Appendix 3 Table A3.1 | 309 | Update figs to reflect planning permission | PA42 Ilkeston Road - Radford Mill Garden Street/ Ilkeston Road 314 <u>335</u> 314 <u>335</u> 314 <u>335</u> |
| Appendix 3 Table A3.1 | 309 | Update figs to reflect planning permission | PA44 Derby Road - Sandfield Centre Derby Road 70 <u>90</u> 100 85 <u>95</u> |
| Appendix 3 Table A3.1 | 309 | Update figs to reflect reassessment of site area and consequent capacity | PA45 Prospect Place Prospect Place 35 <u>20</u> 50 <u>25</u> 42 <u>23</u> |
| Appendix 3 Table A3.1 | 310 | Update figs to reflect planning permission | PA55 Ruddington Lane - Rear of 107-127 Ruddington Lane 46 <u>20</u> 24 <u>20</u> 20 |
| Appendix 3 Table A3.1 | 310 | Update figs to reflect planning permission | PA57 Clifton West Hawksley Gardens 255 <u>280</u> 275 <u>280</u> 265 <u>280</u> |
| Appendix 3 Table A3.1 | 310 | Update figs to reflect planning permission | PA62 Creative Quarter - Brook Street East Brook Street East 30 <u>43</u> 43 36 <u>43</u> |
| Appendix 3 Table A3.1 | 311 | Update figs to reflect planning permission | PA69 Canal Quarter - Station Street/ Carrington Street Station Street/ Carrington Street 45 <u>319</u> 55 <u>319</u> 50 <u>319</u> |

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| Appendix 3 Table A3.1 | 311 | Update figs to reflect planning permission for part of the site | PA72 Canal Quarter - Waterway Street Traffic Street 75 <u>170</u> 425 <u>170</u> 400 <u>170</u> |
| Appendix 3 Table A3.1 | 311 | Update figs to reflect planning permission for part of the site | PA73 Canal Quarter - Sheriffs Way/ Arkwright Street Meadows Way 400 <u>305</u> 450 <u>305</u> 425 <u>305</u> |
| Appendix 3 Table A3.1 | 311 | Additional asterice to reflect extra insert. Update figures to take account of potential complex site assembly. | PA82 ***** Waterside - Freeth Street Meadow Lane 450 <u>100</u> 250 <u>200</u> 200 <u>150</u> |
| Appendix 3 Table A3.1 | 311 | Additional asterice to reflect extra insert | PA83 ***** Waterside- Daleside Road, Trent Lane Basin |
| Appendix 3 Table A3.1 | 311 | Update figs to 2018 | Total 7,092 <u>7,447</u> 8,626 <u>8,756</u> 7,857 <u>8,101</u> |
| Appendix 3 | 312 | Add para as 150 dwellings considered to be developed beyond the plan period to take account of potential complex site delivery | PA11 **Stanton Tip - Hemphill Vale <u>This site is anticipated to deliver approximately 500 dwellings in the longer term, however, 350 dwellings are expected to be developed within the Plan period, to take account of potential complex site assembly.</u> |
| Appendix 3 | 312 | Add para to update figs to 2018 to reflect take-up | PA15** Bulwell Lane - Former Coach Depot The site has planning permission for 32 dwellings of which 8 were completed 2017/18 leaving 24 to be delivered |
| Appendix 3 | 312 | Update figs to 2018 to reflect take-up | PA17 ***Woodhouse Way – Woodhouse Park This site has planning permission for 290 dwellings of which 178 <u>238</u> were completed 2015/17 <u>8</u> leaving 112 <u>52</u> to be delivered |

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| Appendix 3 | 312 | Update figs to 2018 to reflect take-up | PA33****_ Chalfont Drive - Former Government Buildings This site has planning permission for 475 dwellings of which 42 <u>151</u> were completed 2016/17 8 leaving 433 <u>324</u> to be delivered |
| Appendix 3 | 312 | Update asterices to reflect extra insert. Update figures to take account of potential complex site assembly. | PA82 ****_Waterside – Freeth Street This site is anticipated to deliver between 350 and 420 dwellings in the longer term, however, between 450 <u>100</u> and 250 <u>200</u> dwellings are expected to be developed within the Plan period with a mid-point of 200 <u>150</u> , to take account of potential complex site assembly. |
| Appendix 3 | 312 | Update asterices to reflect extra insert | PA83*****_ Waterside - Daleside Road, Trent Lane Basin There were 44 completions on this site 2016/17 leaving 256-296 to be completed |
| Appendix 3 Table A3.2 | 312 | Update figs to 2018 | <p>Past Completions 2011-178 <u>4,627</u> <u>6,020</u></p> <p>Waterside 1,126 <u>1,076</u></p> <p>Boots Campus 230</p> <p>Stanton Tip 500 <u>350</u></p> <p>Other LAPP Sites 6,004 <u>6,445</u></p> <p>Other sites deliverable by 2028 (taken from Strategic Housing Land Availability Assessment) 4,810 <u>4,180</u></p> <p>Windfall Allowance 1,815 <u>1,785</u></p> <p>Demolitions - 342 <u>300</u></p> <p>Housing provision in Nottingham 2011-2028 48,767 <u>19,786</u></p> |

PPSC16: These changes update the employment figures to include take-up to 31st March 2018.

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| Making it Happen SA1 Justification Table 6 | 188 | Update figs to 2018 | Take up 2011-178 48,844 <u>20,166</u> sqm 2.3 <u>62.5</u> ha Requirement after deducting take-up 2011-178 227,859 <u>226,534</u> 22.64 <u>22.5</u> ha |
| Making it Happen SA1 Justification para 6.12k | 189 | Update figs to 2018 | In respect of office floorspace, the Core Strategy figure is 253,000. When Gross Internal Area and completions between 2011 and 20178 are factored in, the requirement to 2028 is 227,859 <u>226,534</u> . The Local Plan allocations allow for between 182,100 and 290,200, the mid- range for which is 236,150, some 8,294 <u>9,616</u> above the Core Strategy requirement. |
| Appendix 4 para A4.1 | 315 | Update figs to 2018 | Since 2011 48,844 <u>20,166</u> sqm have been developed for offices leaving a remainder of 227,859 <u>226,534</u> sqm to allocate. Since 2011 2.36 <u>2.5</u> hectares have been developed for industry & warehousing leaving a remainder of 22.64 <u>22.5</u> hectares to allocate. |