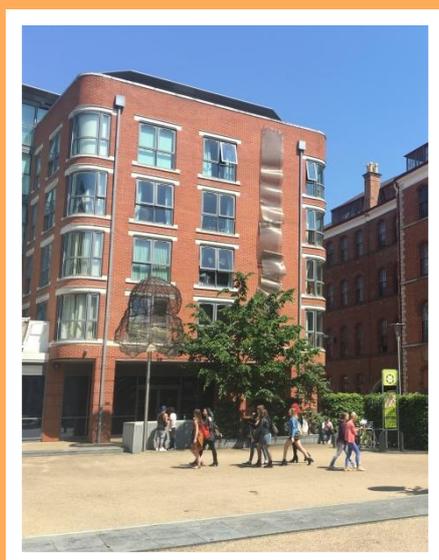


Nottingham City

land and planning policies

Development Plan Document
Local Plan Part 2



Sustainable, Inclusive and Mixed Communities
Background Paper Addendum
September 2017

Quick Guide to the Sustainable, Inclusive and Mixed Communities Background Paper Addendum to the Land and Planning Policies Development Plan Document Publication Version of the Land and Planning Policies (LAPP) document (Local Plan Part 2) (see www.nottinghamcity.gov.uk/localplan)

Purpose of this document:

The Land and Planning Policies (LAPP) document (Local Plan Part 2) forms part of the Local Plan for Nottingham City along with the [Core Strategy](#) which guides future development in Nottingham City. The Local Plan Part 2 contains development management policies against which planning applications will be determined and site allocations for future development.

The Local Plan is supported by a range of evidence and background papers. The Publication Version [Sustainable, Inclusive and Mixed Communities Background Paper](#), January 2016 sets out the context, need and evidence base underpinning the Council's approach to Housing Policies. This addendum supplements and updates the evidence base relating to policies HO1 to HO6 and sets out reasons for any proposed changes to the policies.

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1.0 Introduction

- 1.1 The Publication Version Sustainable, Inclusive and Mixed Communities Background Paper (January 2016) sets out the context, need and evidence base underpinning the Council's approach to Housing Policies. This addendum supplements and updates the evidence base relating to policies HO1 to HO6 and sets out reasons for any proposed changes to the policies.

2.0 Update on LAPP Housing Policies and Sites

Changes to Housing Policies and Sites

- 2.1 Policy HO1 (Housing Mix) minor amendments to HO1.4 to ensure viability considerations and site specific circumstances are taken into account when providing serviced self build plots or custom build homes.
- 2.2 Policy HO2 (Protecting Dwellinghouses (Use Class C3) suitable for Family Occupation) is unchanged.
- 2.3 Policy HO3 (Affordable Housing) has been amended to clarify that the threshold for affordable housing is 15 dwellings or more, or 0.5 hectares or more. It allows for any threshold the government may set for starter homes. Amendments to the policy also confirm that affordable rent housing is an appropriate form of affordable housing, and that the Government's policy on starter homes, once finalised will be a relevant factor in negotiating the type of affordable housing to be provided on a site.
- 2.4 Policy HO4 (Specialist and Adaptable Housing) is unchanged.
- 2.5 Policy HO5 (Locations for Purpose Built Student Accommodation) has been amended in response to representations to more explicitly ensure that where new purpose built student housing is proposed, that there is a suitable demonstration of need for the type of purpose built housing, or else the developer has entered into an agreement with a higher education establishment for the bedspaces provided by the development.
- 2.6 Policy HO6 (Houses in Multiple Occupation (HMOs) and Purpose Built Student Accommodation) has been amended in response to representations to ensure new purpose built student housing development includes appropriate room sizes and provides adequate communal space and facilities, and student drop off/ and collection arrangements.

- 2.7 Policy RE8 (Waterside) has been amended to better reflect the vision of creating a sustainable community with new residential development on sites fronting the river comprising predominantly family housing.
- 2.8 Table A3.1 in Appendix 4 sets out the anticipated housing delivery on sites allocated for housing in the LAPP. This table has been amended to reflect updated information since publication, for instance to reflect recent planning permissions or other information, or as a result of representations. The midpoint of the number of dwellings anticipated to be developed on these sites is now 7,942 compared to 8,415 in the Publication LAPP.

Housing Sites Anticipated Housing Development (Appendix 3 of the LAPP)

- 2.9 Table A3.1 of Appendix 3 of the LAPP shows the numbers of dwellings anticipated to be delivered on sites allocated in the LAPP. Proposed Changes have been made to anticipated delivery on some of the sites (see Table 1 on page 3).
- 2.10 The total anticipated delivery on LAPP sites has been amended to reflect these changes:
- Minimum was 7,473 and is now 7,136
 - Maximum was 9,357 and is now 8,752
 - Mid point was 8,415 and is now 7,942
- 2.11 Three footnotes have been added to the table as follows:

PA04* Linby Street Filey Street

Whilst this mixed use site is suitable for an element of residential use, inclusion of residential uses is dependent on the delivery of a wider flood risk mitigation scheme. Therefore, in agreement with the Environment Agency, the estimated dwelling numbers for this site are not included in the overall housing figures for plan period.

This follows an agreement with the Environment Agency which unfortunately was not taken into account in the Publication Draft.

PA17 Woodhouse Way – Woodhouse Park**

This site has planning permission for 290 dwellings of which 76 were completed 2015/16 leaving 214 to be delivered

PA82* Waterside – Freeth Street**

This site is anticipated to deliver between 350 and 420 dwellings in the longer term, however, between 150 and 250 dwellings are expected to be developed within the Plan period with a mid-point of 200, to take account of potential complex site assembly.

Table 1: Numbers of dwellings anticipated to be delivered on sites allocated in the LAPP

Site ref	Site Name	Address	Min	Max	Mid Point	Reason
PA03	Eastglade, Top Valley – Former Eastglade School Site	Birkdale Way	9744	9744	9744	To reflect latest information from Nottingham City Homes
PA04	*Linby Street/Filey Street	Main Street	0	26	13	Whilst this mixed use site is suitable for an element of residential use, inclusion of residential uses is dependent on the delivery of a wider flood risk mitigation scheme.
PA05	Ridgeway – Former Padstow School Detached Playing School	Ridgeway	40490	404110	404100	Range introduced following reappraisal of site capacity
PA06	Beckhampton Road - Former Padstow School Detached Playing Field	Beckhampton Road	25 0	25	25 12	Range amended following reappraisal of site capacity, and proposed site use
PA09	Edwards Lane – Former Haywood School Detached Playing Field	Edwards Lane	42485	424115	424100	Range introduced to allow flexibility in site layout, given topographic constraints
PA10	Piccadilly - Former Henry Mellish School Playing Field	Piccadilly	35 30	46 38	44 34	To accommodate larger area of open space
PA13	Edwards Lane – Former Haywood School Site	Edwards Lane	63	109	86	Site is substantially complete
PA17	Woodhouse Way – Woodhouse Park**	Land off Woodhouse Way	290214	340214	300214	The footnote and the change in numbers reflect the development that has taken place 2015-16
PA18	Vernon Road – Former Johnsons Dyeworks	Vernon Road	8760	87115	87	Range introduced following reappraisal of site capacity
PA19	Lortas Road	Perry Road	30 35	38 35	34 35	To reflect planning permission
PA20	Haydn Road/Hucknall Road – Severn Trent Water Depot	Hucknall Road /Haydn Road	60	6080	6070	Range introduced following reappraisal of site capacity
PA24	College Way - Melbury School Playing Field	College Way	56 40	56 50	56 45	To reflect reduction in site boundary to accommodate school food growing area
PA25	Chingford Road Playing Field	Wigman Road	175 120	200 160	188 140	To accommodate a larger

						area of public open space
PA26	Denewood Crescent – Denewood Centre	Denewood Crescent	11090	110120	110105	Range introduced to allow flexibility in site layout
PA27	Wilkinson Street - Former PZ Cussons	Wilkinson Street	150 65	200 90	175 77	Range amended to accommodate flexibility in mix of uses anticipated.
PA28	Ransom Road – Hine Hall	Ransom Road	40	40	40	Site owners have confirmed that the site will not be developed
PA31	Ascot Road – Speede	Ascot Road	44	44	44	Site is substantially complete
PA32	Beechdale Road – South of Former Co-op Dairy	Beechdale Road	6636	6636	6636	Site size has been reduced to reflect site ownership and a review of site deliverability. Updated residential yield reflects the planning permission for the remaining part of the site.
PA34	Beechdale Road – Former Beechdale Baths	Beechdale Road	35	50	42	Wholly retail scheme anticipated and housing numbers amended accordingly
PA35	Woodyard Lane – Siemens	Lambourne Drive	10080	100	10090	Range introduced to accommodate flexibility in site layout
PA39	Carlton Road - Albany Works Site and Former Co-op	Carlton Road	0	35	18	Albany Works part of the site has been removed as it has now been developed for retail
PA40	Daleside Road - Former Colwick Service Station	Daleside Road	25 16	25 16	25 16	To reflect planning permission
PA41	Alfreton Road – Forest Mill	Denman Street	66 290	160 310	113 300	Dwelling numbers amended to reflect emerging scheme, including an overall reduction in commercial floorspace.
PA42	Ilkeston Road - Radford Mill	Garden Street/Ilkeston Road	96 314	96 314	96 314	Dwelling numbers amended to reflect completion on rear part of site and the anticipated yield on the remaining site, taking account of the character of the site and scheme currently under consideration.
PA43	Salisbury Street	Salisbury Street	2022	2022	2022	To reflect planning permission
PA44	Derby Road - Sandfield Centre	Derby Road	190 70	225 100	207 85	To reflect the aspiration for predominately family housing on the site.
PA46	Derby Road – Former Hillside	Leengate	2930	2940	2935	Range introduced following a reappraisal of site capacity

PA47	Abbey- Street/Leengate	Abbey Street	25	25	25	To reflect uncertainty over the deliverability of housing on this site
PA54	Riverside Way	Robin Hood Way	0	100	50	Deleted due to an appraisal of site deliverability
PA55	Ruddington Lane - Rear of 107-127	Ruddington Lane	16	1624	<u>1620</u>	A higher range in density is considered appropriate to local area and to respond to consultee comments.
PA56	Sturgeon Avenue – The Spinney	Sturgeon Avenue	7740	7760	<u>7750</u>	Range introduced to accommodate flexibility in site layout
PA57	Clifton West	Hawksley Gardens	285260	285	285273	Range introduced to allow flexibility in site layout
PA58	Green Lane - Fairham House	Green Lane	25 24	75 24	<u>50 24</u>	To reflect current planning permission
PA61	Royal Quarter - Burton Street, Guildhall, Police Station and Fire Station	Burton Street	0300	45 400	<u>23 350</u>	To reflect current Developer Agreement
PA62	Creative Quarter – Brook Street East	Brook Street East	030	10050	<u>5040</u>	Range amended to reflect a review of site capacity
PA63	Creative Quarter – Brook Street West	Brook Street West	0	100	50	Site owners have confirmed that there are no plans to relocate, site therefore not considered deliverable.
PA64	Creative Quarter – Sneinton Market	Southwell Road	5020	5030	<u>5025</u>	Range introduced following reappraisal of site capacity and to accommodate flexibility in mix of uses anticipated
PA65	Creative Quarter – Bus Depot	Lower Parliament Street	102100	170	136135	Range amended to round figures
PA66	Castle Quarter, Maid Marian Way – College Site	Maid Marian Way	50	50100	<u>5075</u>	Range introduced following reappraisal of site capacity and to accommodate flexibility in mix of uses anticipated
PA67	Broadmarsh Centre	Broadmarsh Centre	50	100	75	To reflect a reassessment of the capacity of this site to deliver housing (in line with the Housing White Paper).
PA70	Canal Quarter – Queens Road, East of Nottingham Station	Queens Road	200150	200	200175	Range introduced to accommodate flexibility in mix of uses anticipated
PA72	Canal Quarter - Waterway Street	Traffic Street	42 75	42 125	<u>42 100</u>	Residential range increased to reflect a reassessment of the capacity of the site and its sustainable location (in line

						with the Housing White Paper)
PA73	Canal Quarter – Sheriffs Way/Arkwright Street	Meadows Way	150 <u>100</u>	150	150 <u>125</u>	Range introduced to accommodate flexibility in mix of uses anticipated
PA74	Canal Quarter - Arkwright Street East	Arkwright Street East	25 <u>100</u>	50 <u>140</u>	37 <u>120</u>	Residential range increased to reflect a reassessment of the capacity of the site and its sustainable location (in line with the Housing White Paper).
PA79	Waterside - Iremonger Road	London Road	67 <u>100</u>	67 <u>150</u>	67 <u>125</u>	Residential range increased to reflect a reassessment of the capacity of the site and its sustainable location (in line with the Housing White Paper)
PA80	Waterside – Cattle Market		65 <u>50</u>	65 <u>80</u>	65	Range introduced to accommodate flexibility in mix of uses anticipated
PA81	Waterside – Meadow Lane	Meadow Lane	400 <u>280</u>	500 <u>320</u>	450 <u>300</u>	Capacity of the site has been revisited in light of the aim to foster a sustainable community for the Waterside
PA82	Waterside – Freeth Street***	Meadow Lane	240 <u>150</u>	479 <u>250</u>	245 <u>200</u>	Capacity of the site has been revisited in light of the aim to foster a sustainable community for the Waterside. Footnote and housing numbers to reflect that only 200 dwellings may be developed by 2028, with the remainder developed after the Plan period
PA83	Waterside - Daleside Road, Trent Lane Basin	Daleside Road	360 <u>300</u>	360 <u>340</u>	360 <u>320</u>	Capacity of the site has been revisited in light of the aim to foster a sustainable community for the Waterside.
PA85	Waterside - Trent Lane, Park Yacht Club	Trent Lane	213 <u>150</u>	460 <u>170</u>	337 <u>160</u>	To reflect planning permission over part of the site and capacity of the site has been revisited in light of the aim to foster a sustainable community for the Waterside.

3.0 The Amount of New Housing to be Provided

2014-based Household Projections

- 3.1 Since the January 2016 Sustainable, Inclusive and Mixed Communities Background Paper was published, the Government has released new 2014-based Household Projections. If the new household projections were to indicate a significantly different objectively assessed housing need from that identified in the Core Strategy, this could trigger its review.
- 3.2 The 2014-based household projections show an increase in households over the 2012-based projections, but the level of households at 2028 is slightly lower than for the projections used for the Aligned Core Strategies. At this stage it has been concluded that the housing provision planned for in the Core Strategy remains appropriate, and all the part 2 Local Plans across the Greater Nottingham area are being prepared on this basis.
- 3.3 The partner Councils making up Greater Nottingham have concluded that it is likely to be appropriate to review housing provision after the adoption of the current round of Part 2 Local Plans, basing the objective assessment of housing need for Greater Nottingham on the next round of Household Projections, due in 2018.

Housing Completions

- 3.4 Between 2011 and 2016, 3,653 homes (net) were completed in Nottingham, leaving a requirement of 13,497 to 2028. This is slightly ahead of the 3,590 new homes anticipated in the Core Strategy. See Table 2 below.

Table 2: Nottingham City Completions (net) 2011/12 to 2015/16

Nottingham City	2011/12	2012/13	2013/14	2014/15	2015/16	Total 2011/16	Ave p.a
Actual Completions	422	799	463	1,022	947	3,653	731
Core Strategy Anticipated Completions	475	475	880	880	880	3,590	718

- 3.5 The Housing Land Availability Report (2016) shows a 5.68 years of deliverable sites using the 'Liverpool' approach and 5.89 using the 'Sedgefield' approach against a requirement of 5.25 including a 5% buffer.

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- 3.6 Since the [Sustainable, Inclusive and Mixed Communities Background Paper](#) was published in January 2016, the Council has produced a new [Housing Land Availability Report \(2016\)](#) includes an updated trajectory (the original trajectory was included in the Core Strategy, but is updated annually) indicating how much housing is expected to be delivered from different sources in each year to 2028. This is based upon an update of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA identifies all sites which are currently known about which are expected to be developed up to 2028. The developable sites which it contains, together with an indication of when they are expected to be developed, are listed in the 2016 Housing Land Availability Report.
- 3.7 The Plan shows that suitable sites are available for about 13,812 dwellings (homes) between 2016 and 2028. An additional 1,935 dwellings are expected to be built on "windfall sites", the location of which is not yet known. The LAPP housing sites are included in these figures. More details about each site can be found in the SHLAA report. These changes are reflected in the Proposed Changes to Table A3.1 of the LAPP.
- 3.8 Some 934 demolitions are expected in the same period, which together with completions for 2011/16 (3,653) means that the net increase in homes between 2011 and 2028 is anticipated to be about 18,466 against the Core Strategy requirement of 17,150. This surplus allows for flexibility if sites do not come forward as anticipated.

4.0 Affordable Housing

Affordable Housing Completions

- 4.1 Monitoring of the Core Strategy shows that between 2011/12 and 2015/16, 750 affordable homes were completed from all sources (not just S106), equating to some 20.5% of all net completions.

Policy HO3 "Affordable Housing"

- 4.2 Policy HO3 "Affordable Housing" has been amended to clarify the threshold of 15 dwellings or more for development to be eligible for affordable housing contributions, and to recognise that the Government may set its own threshold for starter homes and/or other home ownership products, which may be different from the Local Plan threshold for other types of affordable housing. The policy has also been amended to allow Affordable Rented homes to be included as affordable housing contributions (reflecting current practice at the Council).
- 4.3 The type of affordable housing to be negotiated now includes a criterion requiring the Government's policy on starter homes and other affordable home ownership products to be part of the consideration. At the time of writing, the Government's approach is not entirely clear. The Housing White Paper suggests that suitable sites (which would be

above 10 dwellings and/or 0.5ha) should include a 10% requirement for Starter Homes and/or other Affordable home ownership products. However, the final approach is yet to be announced or set out in regulations. The re-wording of the policy allows for the flexibility to respond to whatever approach the Government decides is most appropriate.

- 4.4 A revised definition of Starter Homes is also included as a footnote in the LAPP, in line with that set out in the [Housing White Paper](#). A Starter Home is a new dwelling, available to qualifying first time buyers only, sold at a discount of at least 20% of the market value, sold at less than the price cap of £250,000, and subject to restrictions on sale and letting. The 2017 Housing White Paper also proposes that a person's eligibility to purchase a starter home is also limited to those who have maximum household incomes of £80,000 a year or less (or £90,000 a year or less in Greater London).

5.0 Custom and Self Build Housing

- 5.1 A Custom/Self Build Register has now been established in Nottingham, and is coordinated alongside the Registers for the other Councils making up the Nottingham Housing Market Area. The Register is currently hosted by Gedling Borough Council, with links from the [Nottingham City Council website](#), and was established on 1st April 2016. The register currently has 37 entries (September 2017). Nine entries prefer Custom Build, and 28 prefer Self Build.
- 5.2 The level of demand expressed through the register is considered to be modest at present, and not of a scale that would merit a policy requirement for allocated sites to provide a proportion of homes as self/custom build. However, the level of demand will be kept under review, and in line with the policy, a Supplementary Planning Document will be prepared if necessary. Custom Build opportunities in the City include Brook Street East, also known as Fruit Market (PA62) and Trent Basin (PA83).

6.0 Housing Mix

- 6.1 This section updates and amplifies the Sustainable, Inclusive and Mixed Communities Background Paper (January 2016) by setting out the Council's approach to housing mix.

Background

- 6.2 The approach goes back to the 2005 Local Plan which includes saved policy ST1 (Sustainable Communities) which sought to achieve a balanced mix of housing type size and affordability in the area, particularly promoting housing for families with children and appropriate homes which allow older or disabled people to stay in their local community.

In support of this, it also contains policies on density (saved policy H2), appropriate housing types (policy H3, not saved), affordable housing (saved policy H5) and student housing (saved policy H6).

- 6.3 Subsequently the Council published the [Building Balanced Communities SPD](#) (BBC SPD - March 2006, reissued March 2007). It sets out locations where purpose built student housing would be encouraged, how it should be managed, and how purpose built student housing and Houses in Multiple Occupation¹ (HMOs) will be controlled, in response to the range of issues arising within local communities which are heavily dominated by student housing (see Appendix 2 of the BBC SPD).
- 6.4 The BBC SPD set criteria for judging whether the creation and maintenance of balanced communities is prejudiced, and this included the percentage of households within an area that are solely made up of students. The BBC includes a methodology for determining whether an area has a significant concentration of student households (see BBC SPD Appendix 2). It uses student Council Tax exemption data to identify census output areas with 25% or more of student households. In order to represent the “local community” these output areas, and those directly adjacent to them, form the area where a calculation is undertaken to determine whether there is a significant concentration. Where the output area and those directly adjacent to it have a concentration of 25% or more of student households, there is a presumption against the change of use to create further HMO provision.
- 6.5 Subsequently, in response to issues raised by concentrations of HMOs, the government introduced use class C4 HMOs², although switching between use class C3 dwellinghouses and C4 HMOs is permitted development. Concentrations of HMOs (whoever they are occupied by) are recognised as exhibiting similar impacts on local communities as concentrations of student households, and the Council introduced an Article 4 Direction in 2012 which applies City-wide, so in Nottingham change of use from C3 to C4 now requires planning permission. (See ‘[Article 4 Direction in Relation to Houses in Multiple Occupation](#)’, Report to Executive Board, 2011, and [Evidence Gathering – Housing in Multiple Occupation and possible planning responses](#), Final Report, CLG 2008.)
- 6.6 A number of negative effects have arisen in certain neighbourhoods within the City as a result of the increased use of private sector accommodation. These effects have been reported in other University towns and cities across the country and can include:

¹ At the time, there was no HMO use class, so HMOs were defined as being dwelling houses which comprise more than 6 people living together as a single household.

² small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

- An upward pressure on rents within the private rental market also resulting in increased house prices – due to the high prices a number of sharing students can pay compared with a family;
- Imbalanced and unsustainable communities;
- Increased levels of crimes can be reported as students living in shared accommodation can be more susceptible;
- Community cohesion of the area can be deteriorated – often due to the temporary and transitory nature of HMO style of living;
- Other adverse community impacts in terms of additional numbers of cars and associated parking problems, not taking care of rubbish, lack of care/maintenance of front and back gardens and other negative effects on the physical environment and streetscape;
- Noise and other antisocial behaviour late at night / early mornings;
- Restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population and other pressures upon local facilities; and
- Growth in the private rented sector at the expense of owner-occupation

Submitted Local Plan

- 6.7 Both the Core Strategy and the LAPP continue this focus on sustainable, inclusive and mixed communities. The adopted Core Strategy Policy 8 provides for an emphasis on family housing in Nottingham City outside the City Centre, and for an emphasis on flats of two bedrooms or more within the City Centre. It sets the threshold for affordable housing, and the justification text states that the approach to student housing, C4 HMOs and larger sui generis HMOs will be set out in the LAPP.
- 6.8 LAPP Policy HO1 (Housing Mix) is aimed at providing a range of home sizes and types, but particularly encouraging family housing, in response to the issues set out in section 3 of the January 2016 Background Paper. Due to the existing low proportion of larger housing in Nottingham, this is considered to be in accordance with paragraph 50 of the NPPF which requires Local Authorities to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 6.9 The principle of encouraging family housing is established by Policy 8 (Housing, Size, Mix and Choice) and Policy 5 (Nottingham City Centre) of the Nottingham Core Strategy, which places an emphasis on providing family housing, including larger family housing, to meet the strategic priorities of The Nottingham Plan to 2020 and the aims of the Housing Nottingham Plan 2013-2015.

- 6.10 The Housing Nottingham Plan states that there is a continuing need to develop larger family housing in Nottingham as part of the wider mix and balance in order to provide a wider quality of and choice for citizens. Nottingham City Council has a particularly low proportion of homes suitable for families when compared to both the Housing Market Area as a whole and the national average.
- 6.11 The policy is not aimed at preventing any non-family housing coming forward, but instead sets out that family housing is a key priority for the City and “encourages” its provision. The policy then sets out a series of criteria that are to be used to determine if a site is suitable for accommodating family housing and therefore one on which family housing is encouraged. This does not preclude a wide range of other housing types being developed as part of mixed-use schemes, or indeed no family housing being provided on sites which are not suitable, for instance where other housing types would better meet regeneration objectives by addressing viability issues associated with a site.
- 6.12 The housing policies taken together have been developed to ensure that together they provide a sustainable mix of homes within communities. Policy HO1 (Housing Mix) and HO2 (Protecting Dwellinghouses (Use Class C3) suitable for Family Occupation) seek to ensure the emphasis on family housing contained in the Core Strategy provides choice for those residents who would otherwise have to leave the City to fulfil their housing need for this type of housing, due to the low proportion of family housing in the City compared to the Greater Nottingham housing market area as a whole. In the 2011 census, only 55.6% of dwellings in Nottingham had 3 or more bedrooms compared to 63.3% in Greater Nottingham and 60.5% nationally.
- 6.13 Policy HO5 (Locations for Purpose Built Student Accommodation) identifies locations for this housing type, whilst Policy HO6 (Houses in Multiple Occupation (HMOs) and Purpose Built Student Accommodation) seeks to ensure that communities are not dominated by particular household types (HMOs and purpose built student accommodation), so that the environmental issues identified with concentrations of these types of housing can be mitigated and there are opportunities for other housing types to remain or to be provided.
- 6.14 Together the housing policies aim to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities by planning for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Where relevant, the policies identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

‘Significant Concentrations’ of HMOs and/or other student household

- 6.15 The Housing Strategy makes it clear that HMOs are a vital component of Nottingham’s housing market. They deliver a flexible, affordable housing solution for younger working people and are also the major option for people who are in receipt of benefits and are renting at Local Housing Allowance rates. The Council continues to work in partnership with landlords to support and encourage the delivery of good quality non-student HMO accommodation, and has introduced Additional Licensing³ of HMOs in some areas to achieve this aim.
- 6.16 However, policies are required to ensure communities remain balanced and to prevent them from becoming dominated by a narrow range of household types, Policy HO6 (Houses in Multiple Occupation and Purpose Built Student Accommodation) provides criteria against which applications for the development of new or extended HMOs and purpose built student accommodation will be judged. One criteria develops the concept of ‘significant concentrations’ (see BBC SPD) of HMOs and/or other student household types within local communities.
- 6.17 The LAPP considers that a significant concentration is a 10% threshold of HMOs and student households in the housing stock as a whole, calculated using a methodology set out at Appendix 6. The map in Appendix 1 on page 20 shows the extent of Census output areas exceeding a 10% threshold, and directly adjacent output areas. It shows that areas below the threshold extend over much of the City, especially to the north and north west, and in the east. The areas of concentration are focussed around the Universities and the City Centre. (In fact this area is somewhat overstated by the map, since those bigger output areas include large areas of industrial land⁴).
- 6.18 The 10% threshold has been selected because it is considered to strike an appropriate balance between meeting HMO and student accommodation needs within the City and supporting the objective of creating sustainable, inclusive and mixed communities. This is based on a review of current estimates of HMO concentration and methods recently adopted by other local planning authorities facing similar issues including Portsmouth, York, Birmingham, Lincoln, Canterbury, Brighton & Hove and Southampton, and reflects the National HMO Lobby’s view of what constitutes a concentration. The 10% threshold also enables the methodology to capture those areas that are on the brink of materially

³ Before the 1st January 2014, only HMOs which have 3 or more storeys* and are occupied by 5 or more people, that form two or more households, needed a Licence (this excludes self-contained flats). In Nottingham however, the Council has implemented an Additional Licensing scheme, which requires all privately rented HMOs, which are located within a designated area, to be licensed. Additional Licensing operates in the same way and alongside the existing Mandatory Licensing scheme. The same process is followed, with the same legal obligations and penalties for failing to comply with the requirements.

⁴ An output area contains approximately 125 households.

changing their character, and increasingly experiencing the change in character and amenity issues associated with concentrations of HMO and student households from reaching a 'tipping point', a criticism of the previous methodology made by local residents and groups.

- 6.19 The 10% threshold also reflects the concentration of people living in resident HMO and students as well as the number of actual households. Analysis by the national HMO Lobby points to larger household sizes within HMOs compared to occupation by families, they state that the average occupancy of HMOs is twice that of the average household (which is 2.4, see ODPM, Survey of English Housing 2003-04). They state that in an area where 10% of the properties are HMOs, in fact 18% of the population will be HMO occupants. These figures are very similar within the City. Using the 2011 census the average number of occupants within a household is 2.3 compared to average size of a HMO of 5.16 occupants (19.95%, using snapshot of the City's HMO database, October 2016).
- 6.20 The National HMO Lobby identifies 10% of properties or 20% of the population as the 'tipping-point' for HMO-dominance in a neighbourhood. In addition, the impact of HMOs can be greater than a traditional family living in the property with a range of amenity impacts (see para 6.6 on page 10), including, increased waste creation, increase in crime rates, increased pressure on parking provision and increase in anti-social behaviour, noise and nuisance.
- 6.21 The approach of using an area to assess proposals rather than looking at concentrations solely within a particular length of street is preferred because the aim of the policy is to support communities, and the community is much wider than a street frontage. It also allows for variations of concentrations to be taken into considerations, as the adjacent output areas are also taken into account, which may not show the same household characteristics as the output area in which the site occurs.
- 6.22 The policy is worded so that it is not only the 10% threshold that is considered when making judgments but also a range of amenity and other issues, including the individual characteristics of the building or site and immediate locality, the impact of existing HMOs and purpose built student accommodation on the character and amenity of the area. For purpose built student housing, the policy also allows consideration of whether there would be a management plan and appropriate levels of car and cycle parking, whether the proposal contributes to wider regeneration objectives, whether there is a need for the type of accommodation proposed, and whether it is capable of reconfiguration to meet general housing needs in the future, should this prove necessary. Thus the policy is flexible enough to allow for HMO and purpose built student accommodation development to be considered on its merits wherever it is located.

- 6.23 The provision of purpose built student housing in appropriate locations (Policy HO5) is another key strand to maintaining and creating sustainable, inclusive and mixed communities. By providing a high quality alternative option for student households, the policy is aimed at reducing demand for HMO accommodation, and allowing the housing that becomes available to be available to other households.
- 6.24 This policy approach has seen some considerable success. Monitoring of Student Council Tax exemptions has shown a fall across the city of just over 19% in the number of homes exempted over the last 5 years (2011-2016), when PBSA schemes are excluded (See Table 3 on page 16) . This shows that in all but one ward the number of exempt properties has fallen over the 5 years. Even in this ward (Bilborough) the number of Council Tax exemptions was relatively low and so the impact is exaggerated. At the same time, the number of Purpose Built Student Accommodation bedspaces continues to increase year on year with 4,010 additional bedspaces within the same time period.
- 6.25 Over that period, Universities enrolment numbers have generally remained reasonably static, so these findings suggests that the increase in purpose built student accommodation has helped to reverse the number of student households in the general housing stock in line with Council policy. Falling demand for student HMOs is also reported by Unipol (a student housing charity). This fall in demand will allow re-occupation of these properties either as non-student C4 dwellings or C3 dwellings.
- 6.26 As part of the [Sustainability Appraisal Addendum](#) an alternative policy approach of an alternative higher threshold (20-30%) to define significant concentration of HMO's and or student households in an area has been appraised. The general thrust of the policy approach would remain the same and help to restore imbalance of students within certain areas of the City, however the higher threshold approach is likely to be less successful in achieving the desired rebalancing. Overall it is concluded that the alternative policy approach of a higher threshold would result in a less successful policy and this supports the current proposed 10% threshold.

Table 3: Breakdown of number of Council Tax Exempt Properties by ward (2011- 2016)

Ward	2011	2016	Difference	%
Arboretum	1006	863	-143	-14.2
Aspley	60	50	-10	-16.7
Basford	58	50	-8	-13.8
Berridge	432	194	-238	-55.1
Bestwood	57	68	11	19.3
Bilborough	40	34	-6	-15.0
Bridge	892	548	-344	-38.6
Bulwell	38	29	-9	-23.7
Bulwell Forest	27	15	-12	-44.4
Clifton North	73	56	-17	-23.3
Clifton South	56	41	-15	-26.8
Dales	103	62	-41	-39.8
Dunkirk and Lenton	1508	1,454	-54	-3.6
Leen Valley	94	70	-24	-25.5
Mapperley	193	107	-86	-44.6
Radford and Park	1654	1,510	-144	-8.7
Sherwood	66	44	-22	-33.3
St Anns	917	712	-205	-22.4
Wollaton East & Lenton Abbey	233	194	-39	-16.7
Wollaton West	122	69	-53	-43.4
Grand Total	7630	6,170	-1,459	-19.1

7.0 Gypsies and Travellers and Travelling Showpeople

- 7.0 The Government's Planning Policy for Traveller Sites (2015) states that local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of travellers in their area. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Accordingly, Core Strategy Policy 9 provides criteria against which future proposals will be assessed and also safeguards existing permanent provision from alternative development.
- 7.1 The Nottingham Gypsy and Traveller Accommodation Assessment (2015) used demographic data and other data such as the number of available pitches to calculate pitch need. The assumptions used in the assessment were considered to be positive and realistic, in that they did not underplay the potential requirement. For instance the Assessment included an assumption that turnover on existing pitches in the City will have only a limited contribution to supply, due to the individual nature of sites present. Overall, the assessment concluded that there was potentially a very modest gross requirement of 2 new pitches for Nottingham over the study period; the net figure would be negative. This additional requirement would arise at the beginning of the plan period, after which the formula suggested the need would cease. The figure is shown in Table 4 below.

Table 4: Net Requirement for Traveller Pitches over the Plan Period (Source South Nottinghamshire Gypsy and Travellers Accommodation Assessment 2014-2029)

Period	No of Pitches
2014 - 2019	1.76
2019 - 2024	-1.98
2024 - 2029	-1.27

- 7.2 Nottingham City Council took this value as the starting point for its Local Plan approach. It supplemented this study further using intelligence on the ground to scrutinise this figure.
- 7.3 There has been no recent planning activity concerning provision of Gypsy and Traveller pitches in Nottingham in recent years, the most recent being the development of an 8 pitch site at Cinderhill, granted planning permission in 2009. Current provision in the City amounts to 40 pitches and this is wholly within the private sector, with no public sector managed sites. Considering the figures from the national caravan count as detailed in Table 5, there have consistently been pitches available for Gypsies and Travellers in Nottingham City. The figure of 13 caravans for January 2016 translates into 10 pitches (when one applies the 1.3 caravans per pitch figure used in the GTAA). This means that at this point in time some 30 pitches were available for use by the Gypsy and Traveller

community, a figure well in excess of the theoretical need figure of 2. The Council is confident that the evidence provided in the caravan counts dating back to 2014 consistently demonstrates a vacancy rate well in excess of the GTAA need figure, hence it does not consider there to be a requirement to allocate additional traveller pitches in the Local Plan.

Table 5: National Gypsy and Traveller Caravan Count Figures – Source : DCLG (May, 2017)

Year	Month	No. of Caravans
2014	January	30
	July	16
2015	January	28
	July	36
2016	January	13

Travelling Show People

7.4 There are currently three sites catering for Travelling Showpeople in Nottingham. Table 6 confirms the total number of caravans between 2013-16. The largest one, granted a further 5 year temporary permission in January 2017, is 1.57 ha and located off Western Boulevard. There are also small sites at Blenheim Lane and at the Relics, Greasley Street. Although the Western Boulevard site is included in this plan as development site, PA22, it will only be developed for housing and employment if it is no longer required to meet the needs of the Travelling Showpeople.

Table 6: Travelling Showpeople Caravans – Source : DCLG (May, 2017)

Year	No of Caravans
2013	16
2014	11
2015	18
2016	12

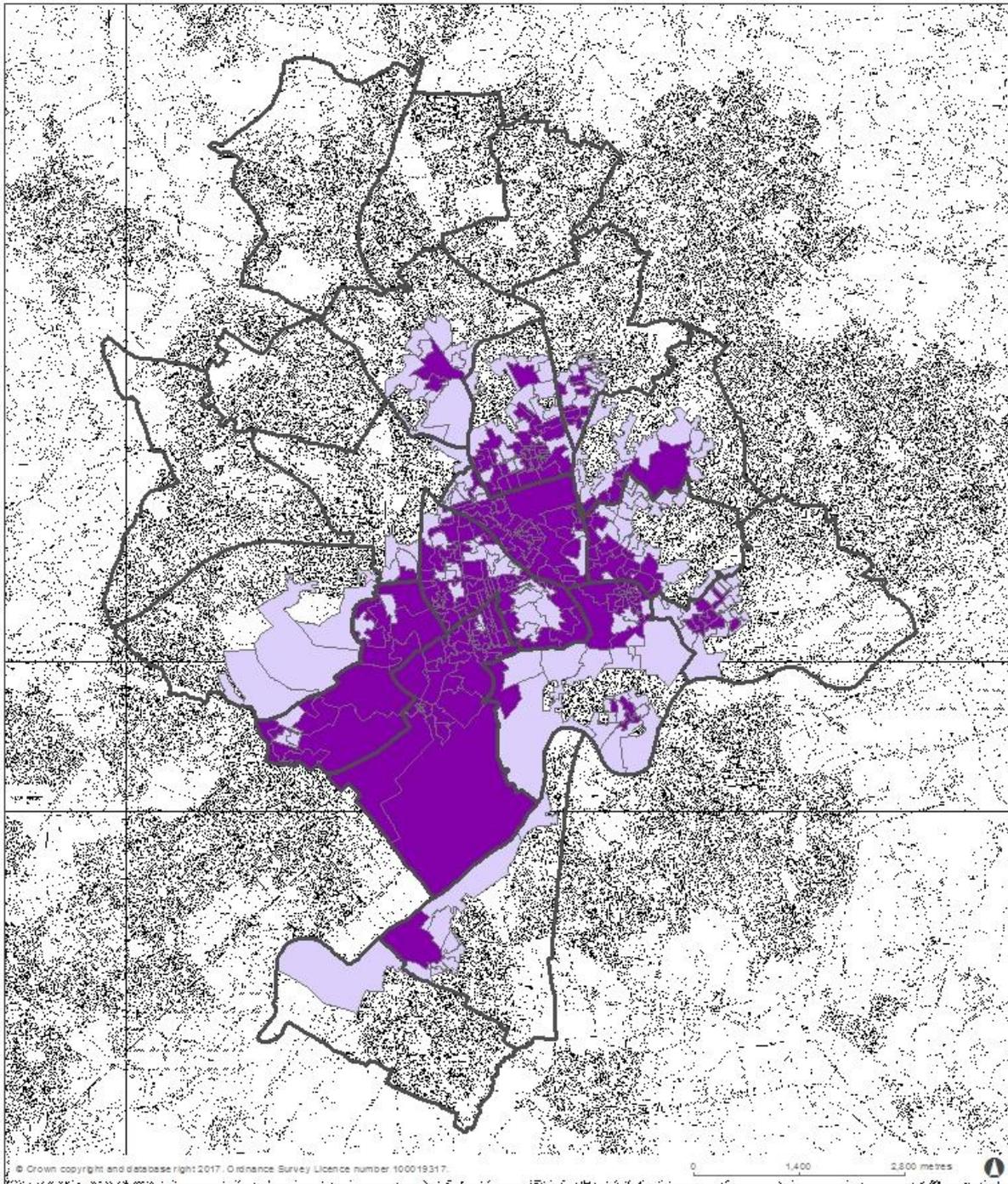
7.5 Travelling Showpeople are distinct from Gypsies and Travellers in that they are not a distinct ethnicity, rather they follow a particular economic occupation. As such, determining future needs through household projections is unreliable. The Council intends to meet their accommodation needs on existing sites. It is considered that there is capacity on these sites to cater for any additional small scale need that may arise from Nottingham’s Travelling Showpeople community. This would be achieved by an intensification of use, subject to general amenity issues, as the Travelling Showpeople do not currently occupy the entirety of the sites as shown by the caravan counts below.

7.6 If a level of need emerges beyond what can be accommodated on existing sites during the Plan period, it will be considered under Core Strategy Policy 9. 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. It is anticipated that this would be met from the private sector (i.e. the Gypsy and Traveller and Travelling Showpeople communities themselves). The City Council will continue to work with its conurbation partners on this strategic issue, and the extent of existing and new provision of pitches and plots will be kept under review.

8.0 Conclusions

- 8.1 The housing policies of the LAPP are specifically aimed at addressing NPPF paragraph 50, which is to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 8.2 The policies are a continuation of an existing policy approach, both with respect to family housing and to concentrations of single household types, but with a different threshold to reflect a widely accepted view that 10% of HMO/student households is appropriate. This approach works alongside other intervention tools, such as Additional Licensing, amenity polices to do with waste collection, restrictions on letting boards etc.

Appendix 1: Census Output Areas with more than 10% HMOs and/or student households



Key **% Student households inc purpose built and HMOs**

- 10% or higher
- Wards
- OAs adjoining 10%

Purpose built households calculated at 1 household per 5 bedspaces



Nottingham
City Council