



Ms Dawn Alvey
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Our ref: 1212 & 1222
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10 March 2016

Dear Ms Alvey

re: Nottingham City Local Plan Part 2

LAND AND PLANNING POLICIES DOCUMENT – PUBLICATION VERSION

Further to our letter of 2 December 2013, which was our response to the previous consultation on the plan, we have considered the revisions and can offer the following further advice, set out in the schedule attached. For reasons of brevity I have confined our response mainly to outstanding issues, but note and welcome the many positive changes to the plan.

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Since the previous consultation the Nottingham Heritage Strategy has been adopted, and we are keen to see that the positive messages about and objectives for the city's historic environment in that document are reflected in the plan.

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We therefore note with pleasure the evolution of the policy on caves, which brings much needed protection to this unique aspect of Nottingham's heritage. This should allow a greater understanding of the resource with the requirement for assessment, and also ensure the conservation of this precious resource.

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Many of the allocations have some useful amendments to their development principles, giving some helpful "fixed points" around which designers and developers can base their plans. However, some of the allocations could have undesirable consequences as the future of heritage assets on them is made unclear in the development principles.

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Investment in buildings is discouraged when their future is made uncertain, and uncertainty may also affect the development economics of these sites, potentially ushering in the demolition of those buildings not specified for retention, particularly where others are. The

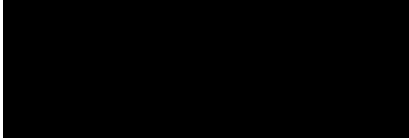



4494

resultant harm would run contrary to the principles of sustainability enshrined in the NPPF and objective 3 of the sustainability appraisal. This could (and should) be avoided by a general presumption against the demolition of buildings that contribute to the significance of conservation areas, subject to the caveats in the NPPF.

We would like to discuss this further with you, with regard to the specific policy and site allocation issues in more detail prior to the close of the consultation period.

Yours sincerely



Clive Fletcher
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General Comments

Since the last iteration of the plan the NPPG has been revised and updated, to expand on the principles set out in the NPPF. This helpfully underscores the strategic aspects of plan making to achieve identified outcomes:

4495 “ In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset.”

4496 The publication of the *Nottingham Heritage Strategy* in advance of the plan has also enabled the plan to be informed by it. A key plank of the strategy is that the identification, locally, of Heritage at Risk has identified opportunities to capitalise on under used or underappreciated heritage assets to deliver economic regeneration. This chimes well with the NPPG.

Development Management Policies

4497 EE33 Permitting change of use to non-employment uses.

We continue to advise that this should be caveated to take into consideration the historic environment.

SH8 Markets

4498 We continue to advise that a suitable caveat to the wording is added to take into account the desirability of preserving or enhancing the historic Sneinton Market, which is a conservation area at risk.

HE1: Proposals Affecting Designated and Non-designated Heritage Assets

4499 This policy was previously two policies that have been rolled together, which we welcome. The use of the phrase “character and appearance” is more specific to conservation areas however, and as the policy is intended to address heritage assets in the round the more universal term “significance” would be more appropriate, as would “better reveal” rather than “enhance” (NPPF 137).

HE2: Caves

4500 This commendable policy now provides very robust, tailored protection to this unique group of heritage assets, and should result in further improvements to our understanding of them. The presence of this policy in the plan contributes immensely to the objective of creating a positive strategy for the historic environment particular to Nottingham, and is warmly welcomed.

Sites

4501

PA28: Ransome Road, Hine Hall

We continue to question the suitability of this site as a housing allocation, although we note that reference to the development brief has been made.

4502

PA33: Chalfont Drive – Former Government Buildings

We note the reference to an “historic building” but advise that it would be worthwhile to specify this as a grade II listed building for the avoidance of doubt.

4503

PA41: Alfreton Road, Forest Mill

Our earlier advice that the Mill was worthy of retention has now unfortunately been made irrelevant following the demolition of the mill. Consideration should now be given from removing the site from the conservation area due to loss of significance, although development on the site will still affect the significance of the conservation area (via setting) if this is done.

4504

PA53: Electric Avenue

We continue to advise that development here will have to take into account the setting of the grade II* listed Church of St Wilfrid, Wilford, and that this should be included in the development principles.

4505

PA54: Boots

The layout of the Boots “campus” is more specifically a “grid” as opposed to the more informal associations the term has. A design brief informed by the conservation plan for the site would be beneficial in guiding to form of development to satisfy the objectives enshrined in the development principles.

4506

PA57: Clifton West

We continue to be concerned about the potential for this allocation to result in harm to the significance of Clifton Hall, a grade I listed building, and disagree with the findings of the sustainability appraisal which accords only moderate negative impacts. Its position overlooking the river valley is a core aspect of its significance. However, the modern housing development to the south of the hall, which is on rising land, unfortunately intrudes into the totemic views of the Hall from across the Trent. This allocation site is on a higher contour and on the same view alignment, and development of it could potentially be even more harmful.

4507

PA64: Sneinton Market

The core significance of the Sneinton Market Conservation Area lies in the early C20 Market Buildings, and we have advised that the development principles should require their retention in the spirit of the “preservation and enhancement” of heritage assets as set out in the wording. It seems inconceivable that this could be achieved other than by their retention.



4507

Past uncertainty over the future of these buildings has discouraged investment in them – establishing certainty through the plan would assist in addressing the issues of dilapidation that have resulted in the conservation area being at risk.

PA65: Creative Quarter – Bus Depot

4508

We have advised that the retention of the frontages *between* Stanhope Street and Manvers Street should be retained, as they contribute to the character and appearance of the conservation area. We note that the wording of the policy has been changed, to encourage the retention of buildings *on* Stanhope Street and Manvers Street – a subtle difference, but which refers instead to buildings *outside the conservation area*. We therefore advise that the wording is amended as originally advised.

PA66: Castle Quarter, Maid Marion Way – College Site

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We agree that substantive redevelopment of this site could better reveal the significance of Nottingham Castle, a grade I listed building. However, we advise that the contribution of the buildings to the south of the site to the significance of the conservation area (and thus a presumption for their retention) still needs to be clearly stated. “Redevelopment” typically refers to site clearance, which would be harmful not only to the conservation area but also to the setting of the Castle. Historic England has helped to organise two design workshops for this site, and the outcomes of these might make a useful update to the published but now somewhat dated design brief.

PA67: Broadmarsh

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The rationale for the boundaries of this site, now that the proposals for the enlarged Broadmarsh Centre have been dropped are unclear, as the existing (and soon to be remodelled) Broadmarsh Centre lies only in one portion of it. The policy also makes no mention of the newly extended Canal Conservation area which now encompasses part of the site.

PA68: Canal Quarter Island Site

4511

We note the mention of “heritage assets”, but the suggested wording that development “should have regard” to them is too vague and unspecific to be useful. The grade II listed building on the site – the Great Northern Warehouse, although a ruin, has statutory protection and could be the subject of an imaginative conversion which would give the site identity. This would also anchor any development among the interesting set of railway buildings which characterise the rail corridor at this point, including the grade II listed London Road Railway Station.

PA69: Station Street/Carrington Street

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We welcome the revised wording for the policy that accompanies this allocation, except to advise that it could go further and apply the same requirement for 11-19 Station Street as for 3-9 and 21 Station Street to ensure the retention of this important commercial frontage which contributes to the significance of Station Conservation Area.



PA74: Sherriff's Way/Arkwright Street

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We continue to advise that the retention of the former Queen's Hotel (No.2 Arkwright Street) is specified in the development principles. It is clear from the boundary that the conservation area was drawn specifically to include this building, which is a part of the setting of Nottingham Railway Station, and contributes to its significance. It also forms a group with no.1, with which it responds in terms of the corner treatment, to "announce" the beginning of the once famous Arkwright Street. This would give welcome certainty to the future of the building and encourage investment in it.



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EAST MIDLANDS OFFICE

Miss Jennifer Cole
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Direct Dial: [REDACTED]

Our ref: [REDACTED]

8 November 2016

Dear Miss Cole

RE: ADDITIONAL ALLOCATION SITE FOR EMPLOYMENT USE PA86 - HORIZON FACTORY, THANE ROAD, NOTTINGHAM

Thank you for your recent consultation on the above additional allocation site where it is proposed to use the land for employment use including offices (B1), General Industrial (B2) and warehousing (B8).

5099

I am writing to confirm that Historic England has no concerns to raise in relation to this allocation. The Horizon Factory was considered for listing in 2015 but the report concluded that the former factory 'does not meet the very high selection criteria for buildings of this date' and was not taken forward for listing.

5100

However, it is suggested that the appraisal section of the Sustainability Appraisal for the site, SA Objective 3 Heritage, be revised to amend the subjective text of the second sentence. Any new development would need to meet the requirements of the Nottingham City Aligned Core Strategy Local Plan Part 1 (2014).

I hope that this information is of use to you at this time.

Yours sincerely,

Rosamund Worrall
Historic Environment Planning Adviser
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