

Representations on the Nottingham City Part 2 Local Plan by Ken Mafham Associates on behalf of Calverton Parish Council

1. Context

4179 1.1 These representations develop further the representations made on the Aligned Core Strategy to the effect that the capacity of brownfield sites in Nottingham City had been underestimated and that there was scope to reduce the housing requirement figures for the other Districts within Greater Nottingham.

1.2 The submissions to the Public Examination for the Aligned Core Strategy on the level of the housing requirement and distribution between Districts were not accepted by the Inspector for the Aligned Core Strategy and an application for Judicial Review failed on the basis that any failure in the drafting of the Core Strategy to follow the principle set out in the Hunston Judgement did not justify the intervention of the Courts so as to delete the Aligned Core Strategy.

4179 1.3 It is the case, however, that the detail of the submissions on brownfield capacity were not discussed at either the Public Examination of the ACS or at any point in the subsequent judicial review. Planning is a dynamic process, all of the Districts have the power to review their Core Strategy and the Districts of Greater Nottingham are required to maintain a five year supply of housing land. We would argue that the Greater Nottingham Housing Market Area is the right spatial level of housing land availability to be assessed and that the preparation of the Part 2 Local Plan for Nottingham City is one appropriate forum for the issues to be properly discussed. The Nottingham Local Plan in general and its assessment of housing capacity, in particular, is an important part of the context for the difficult decisions on greenbelt releases that the other districts have to make in their own part 2 Local Plans.

1.4 The objectives of the Part 2 Local Plan are :-

- i) Environmentally responsible development addressing climate change
- ii) High quality new housing
- iii) Economic prosperity for all
- iv) Flourishing and vibrant town centres
- v) Regeneration
- vi) Protecting and enhancing the areas individual and historic character and local distinctiveness
- vii) Strong, safe and cohesive communities
- viii) Health and wellbeing
- ix) Opportunities for all
- x) Excellent transport systems and reducing the need to travel

xi) Protecting and improving natural assets

xii) Timely and viable infrastructure

An increase in the rate of brownfield development in Nottingham City would be particularly relevant to the achievement of the objectives we have highlighted.

1.5 Regeneration Policies

4347 We welcome Policy RE1 particularly the increased commitment by the City Council to use Compulsory Purchase Powers to unlock barriers to delivery. **4348** We note that housing is mentioned for all the City Centre related regeneration areas (Policies RE2 – RE5) but we do not see any estimate of what the residential capacity of those areas might be. We see no justification for not carrying out this exercise.

4349 Policy HO1 - attempting to influence the type of houses constructed will not assist in the bringing forward of brownfield sites. Such a policy, if it is to be included at all, should have been included in an Aligned Core Strategy, where a wider view should have been taken. The SHMAA is the right place to address issues of this kind.

4179 1. 6 Overall, the Part Two Local Plan is insufficiently proactive with regard to the unlocking of opportunities for housing development on brownfield sites. The reproduction of material on the strategic sites at Stanton Tip, Boots and Waterside adds nothing to the planning process because these were dealt with in the Core Strategy. The Part 2 Local Plan should move on to opportunities at the next scale down, some of which we mention below.

2. Housing Land Demand and Supply

4350 2.1 Site Thresholds
Whilst a 0.5 hectare cut off might be appropriate for sites outside the City Centre and the University Campuses the threshold should be 0.25 hectare in the City Centre, where high densities are the norm. The assessment of sites should also be supplemented by an assessment of buildings with a floor area of more than 1500 sq ms that have been vacant for six months or more. There should be an assessment of the likely contribution of small sites and buildings in aggregate.

4351 2.2 Capacity of brownfield and smaller sites
The Part Two Local Plan is an opportunity to look at supply and demand for housing land in the City. This is done to a limited extent in Appendix Three and this suggests that housing land supply will be sufficient to meet the Core Strategy targets and no more. We would take issue with the figures on page 300 on the following grounds:

2.3 The capacity for dwelling construction on the four University campus sites within the City is simply not assessed and we would suggest it is considerable.

2.4 At no point has the land release due to the closure of Players in Nottingham been considered, or the significant potential of underused employment sites around the Jubilee Campus of the University of Nottingham

2.5 The windfall allowance of 1610 over 15 years amounts to just 123 dwelling per year. This includes changes of use of employment and other buildings, redevelopment and infill on small sites, as well as development on larger sites that cannot be foreseen. We assume the windfall allowance covers all of these.

2.6 Windfalls

Taking the windfall point first, the 2015 Housing Land Availability Study says that:

“Because of the nature of sites in a large urban area (i.e. they were mainly formerly used for non-housing uses and may become available at short notice) Nottingham has a history of large numbers of windfall sites coming forward for development. Even with the introduction of SHLAAs, which are intended to list all sites which may be suitable for housing and are likely to be developed, and the housing market slump, they are continuing to come forward, albeit at a slower rate than previously. For instance, 194 sites totalling 1,189 dwellings were granted planning permission between April 2008 and March 2013 without having been included in the 2008 SHLAA (excluding garden sites). This is an annual rate of 238 dwellings. By 31st March 2013, there were 541 dwellings completed on these sites, 468 of them purpose-built student flats. This amounts to 108 dwellings per annum or 135 if the first year is excluded.”

2.7 It is regrettable that the data only covers the period 2008 to 2013. That period included the slump in housing completions following the 2007/08 recession. It also included a period of uncertainty about student numbers when Government introduced a massive increase in the level of tuition fees that Universities could charge. The number of vacant pubs, factories and former filling stations is likely to continue to increase in the Plan period and the prior approval regime is likely to accelerate the rate these are brought forward for residential conversion. Taking all these factors into account, we suggest that windfall permissions outside the City Centre and the University campuses are likely to be in the region of 257 per annum in the plan period with around 80% being developed at some point in the Plan period. All in all an allowance of 200 per annum for windfalls is reasonable; this would be an additional 1130 dwellings capacity.

2.8 The City Centre

The housing capacity of the various quarters in the City Centre is simply stated on page 300 and no justification offered. The total capacity for the whole City Centre is just over 1700. No attempt has been made to compare this with past rates of contribution of the various quarters or the City Centre as a whole. We see no assessment of the capacity for conversion of vacant office space. In fact we have been unable to find any assessment of the amount of vacant office space in the City Centre. From the figures set out on page 299, it seems that no allowance has been made for the conversion of office space to residential and the most minimal residential content for redevelopment schemes has been allowed; this is particularly striking in the following areas:

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Royal Quarter	23 dws
Bus depot Lower Parliament Street	136 dws
Castle Quarter Maid Marian Way	50 dws
Canal Quarter Station Street Carrington Street	50 dws

2.9 We note that in the table on page 302 the City Council is proposing a net addition of 200,000 sq ms (2 m sq feet). It is unclear how this relates to past rates of development, to vacancy rates and whether it takes into account recent changes in the Broxtowe Local Plan - to propose significant new employment space at Toton close to the proposed HS2 station n for Nottingham and Derby. In 2012 Lambert Smith Hampton estimated that there were almost 1.8 million square feet of vacant Grade B and C office space in Nottingham. It is regrettable that the City Council has not included up to date figures in the evidence base for the Local Plan. We suggest that perhaps 50 % of this space is converted to residential in the Plan period 900,000 square feet, at an average of 800 square feet per dwelling this would add 1125 to the capacity in the City.

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2.10 The Universities

Jubilee Campus

The Jubilee Campus of the University of Nottingham is now firmly established on land formerly occupied by Raleigh and Sturmeay Archer. The area adjacent has greatly increased in prosperity as a result but there remains a large amount of vacant and under occupied employment land and premises. Furthermore Players have announced they are ceasing operations in Nottingham and so their bonded warehouses may well become surplus. There is clearly potential for residential development in this area at a scale well beyond that envisaged in the Plan. We estimate a capacity of around 500 dwellings from this source

2.11 Clifton Campus

There is scope for a development sites of around 7 hectares at the Eastern end of the Clifton site. At a density of 60 dwellings to the hectares this would provide a further 400 dwellings.

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2.12 Space over shops and conversion of vacant pubs outside the City Centre

Based on pilot studies of Radford Road and Mansfield Road, we estimate that an additional capacity of 500 dwellings could be found. This would have very considerable regeneration benefits. Bringing this capacity forward would be a suitable job for a specialist officer within the City Council

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3. Employment Land

3.1 Two recent policy decisions will tend to reduce the demand for employment land in Nottingham City:

- Approval to a large Distribution Depot at Junction 24 with road and rail access.

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- The announcement of Toton as the preferred location for the Derby / Nottingham station for HS2. Broxtowe Borough Council has adopted an interim policy for Toton that involves the development of at least 40 hectares of land for economic development.

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3.2 In strategic highways terms Nottingham City is not the correct location for large scale distribution due to the low capacity, congested road system that cannot cope with existing levels of development, let alone the traffic from another 10000 houses.

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3.3 The office market is heterogeneous. Nottingham City Centre will be the preferred location for firms with large numbers of lower and middle income employees who rely on public transport. For those firms, high value added firms that serve the East Midlands and beyond, there is not a location within the City that can meet the standards of accessibility available at Toton; with or without HS2.

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3.4 Policy EE4 is at odds with the NPPF. The application of the policy to the office market is made clear in para 3.30 “ Where there is a potential large loss of lower grade offices to other2.12 uses on any site, the priority in the LAPP will be to achieve a balance of new development with either a mix on the site which includes the provision of new grade „A“ offices and/or to ensure grade „A“ offices sites are provided and protected elsewhere.”

The amount of grade A office space provided in Nottingham will be determined by the market . Attempts to “ force” the market will simply delay the redevelopment or conversion of obsolete office space for housing and other uses and lead to a continuation of the down beat appearance of many parts of the City Centre at the present time. This is a further example of a tendency in the Plan to translate aspirations into policy without a great deal of thought about market consequences

4 Conclusion

4.1 We estimate there is a further 3000 dwellings capacity in the City over and above the estimate set out in the Local Plan Part Two. We accept this is a very approximate figure and we look forward to working with officers of the City Council to refine the estimate.