



Nottingham
City Council

Nottingham City Council

Local Plan Part 2: Land and Planning Policies

Document Publication

Version Response Form

Ref:

For official
use only

You are advised to read the [guidance note](#) before completing this form, but if you have any questions, please call 0115 876 4594. For the [online](#) form if your response to any question is longer than 10,000 characters or contains maps/diagrams you can either upload your response using the [online](#) form or send it via [email](#).

Please return this response form to localplan@nottinghamcity.gov.uk or Nottingham City Council, LH BOX 52, Planning Policy Team, Loxley House, Station Street, Nottingham, NG2 3NG.

Your response will be regarded as a formal response on the Local Plan Part 2: Land and Planning Policy Document.

Responses must be received by 5.00pm Friday 11 March 2016.

Part A – Contact Details and Future Notifications

Q1 Are you responding as?

- Individual
 Landowner/Developer
 Organisation
 Other _____

Q2 If you have commented before on the Local Plan and have your consultee ID number (this will have been provided on your consultation letter) please provide it.

ID No. _____

Q3 Your Details

Title	
First Name	
Last Name	
Job Title (if relevant)	
Organisation (if relevant)	Deancoast Ltd
Address Line 1	c/o Agent
Address Line 2	
Address Line 3	
Address Line 4	
Address Line 5	
Post Code	
Telephone Number	
E-mail Address	

Q4 Agent's Details (if relevant)

Mr
Ben
Holmes
Oxalis Planning
Unit 7
Wheatcroft Business Park
Landmere Lane
Edwalton
Notts
NG12 4DG

Q5 Do you wish to be notified of any of the following?

(please tick yes or no for each question)

Submission of the Local Plan Part 2 for Examination?
Publication of the Recommendations of the Inspector?
Adoption of the Local Plan Part 2?

- | | |
|--------------------------------------|--------------------------|
| <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Part B – Your Response

If you wish to make more than one response you will need to fill out another form for each response.

Q6 What does your response relate to? (please select **one only** from a-e below).

a) Does your response relate to a site (whether included or not included within the Plan)? (if yes, please specify the site and move to **Q7**)

Which site? (please provide details of the site including ref number and site name. If your comments relate to a site not included in the Plan please provide details so that the site can easily be identified).

- | |
|--------------------------------------|
| <input checked="" type="radio"/> Yes |
| <input type="radio"/> No |

<input checked="" type="radio"/> Site included within the Plan (please give details)

Site Ref: **PA55**

Site Name: **Ruddington Lane, Wilford**

<input type="radio"/> Site not included in the Plan (please give details)
--

Site Name and address:

b) Does your response relate to a Policy? (if yes, please give the Policy, give details then move to **Q7**)

Which Policy? (please provide the Policy reference)

- | |
|---------------------------|
| <input type="radio"/> Yes |
| <input type="radio"/> No |

Policy

Does your response relate to the Policy text or justification text?

- | |
|--|
| <input type="radio"/> Policy text |
| <input type="radio"/> Justification text |

Which part of the text? (please provide the related Policy criteria or paragraph number)

Paragraphs 6.13 to 6.16

c) Does your response relate to another part of the document? (if yes, please state which section then move to **Q7**)

- | |
|---------------------------|
| <input type="radio"/> Yes |
| <input type="radio"/> No |

Which part?

- | |
|--|
| <input checked="" type="radio"/> Policies Map |
| <input type="radio"/> Section 1: Introduction |
| <input type="radio"/> Section 2: Background |
| <input type="radio"/> Appendix 1: Parking Guidance |
| <input type="radio"/> Appendix 2: Schedule of Proposed Transport Network Schemes |
| <input type="radio"/> Appendix 3: Housing Delivery |
| <input type="radio"/> Appendix 4: Employment Delivery |
| <input type="radio"/> Appendix 5: Retail Delivery |
| <input type="radio"/> Appendix 6: Methodology for Significant HMOs Concentration |
| <input type="radio"/> Appendix 7: Schedule of Caves |

d) Does your response relate to supporting documents? (if yes, please specify which document, then move to **Q7**)

- Yes
 No

Which document?

- Sustainability Appraisal
- Equalities Impact Assessment
- Preferred Option Report of Consultation
- Employment Background Paper
- Retail Background Paper
- Green Belt Background Paper
- Climate Change Background Paper
- Site Assessment Background Paper
- Minerals Background Paper
- Sustainable, Inclusive and Mixed Communities Background Paper
- Transport Background Paper
- Infrastructure Delivery Plan

e) Does your response relate to another item not listed?
 (please specify then move to **Q7** where you can provide more details)

- Yes (please give details)

Q7 and **Q8** are required by Planning Regulations. Please refer to the [guidance note](#) for more information

Q7 Do you consider the Local Plan Part 2 to be legally compliant? (please tick yes or no)

- Yes
 No

Q8 Do you consider the Part 2 Local Plan to be 'sound'? (please tick yes or no)

- Yes
 No

If you consider that the Plan is unsound, explain why (please select all that apply and explain in the box to Q9)

a) Do you consider the Plan is unsound because it is **not 'positively prepared'**?

- Yes
 No

b) Do you consider the Plan is unsound because it is **not 'justified'**?

- Yes
 No

c) Do you consider the Plan is unsound because it is **not 'effective'**?

- Yes
 No

d) Do you consider the Plan is unsound because it is **not 'consistent with national Policy'**?

- Yes
 No

Q9 Please explain why you 'support' or 'do not support' the Local Plan Part 2 (ie why you think the Plan is/is not legally compliant/sound). Try and be as precise as possible.

4187

The allocation of land at Ruddington Lane, Wilford (ref PA55) is supported. This is a sustainable location, on land which is currently underused or disused.

The allocation should however recognise the potential for the site to deliver a greater number of dwellings with the potential for higher density and apartments on part of the site. The site is located immediately adjacent to the new tram route and the Compton Acres tram stop. In this regard it is highly sustainable and provides the opportunity for higher density development, including a mix of apartments and family houses.

The Plan should also recognise that additional land could be included in any development in this location.

(please continue on a separate sheet if necessary)

Q10 Please set out what change(s) you consider necessary to make the Plan legally compliant or sound, having regard to the reasons you identified in **Q9**. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any Policy or text. Try and be as precise as possible.

4187

The text under site ref PA55 should be amended to

1. acknowledge the location of the site immediately adjacent to the tram stop
2. acknowledge that the site could provide a mix of dwelling types including apartments as well as family homes
3. acknowledge that the site could be extended to include additional land.

(please continue on a separate sheet if necessary)

Please note your response should cover succinctly all the information, evidence and supporting information necessary to support/justify the response and the suggested change, as there will not normally be a subsequent opportunity to make further responses. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q11 If your response is seeking a change, do you consider it necessary to participate at the examination in person?

- Yes, I wish to participate in person at the examination
- No, I do not wish to participate in person at the examination

Q12 If you wish to participate in person at the examination, please outline why you consider this to be necessary.

To discuss the issues with the Inspector and to ensure the wording helps to facilitate the development of the site

(please continue on a separate sheet if necessary)

Please note the Inspector will determine who participates at the Examination and the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination.

Responses must be received by 5.00pm Friday 11 March 2016.

Thank you for taking the time to have your say on the Nottingham City Council Local Plan Part 2: Land and Planning Policy Document. For further information about this consultation and / or the Local Plan document please contact: Local Plans team on 0115 876 4594 or email localplan@nottinghamcity.gov.uk

Data Protection - The response(s) you submit on the Local Plan Part 2 will be used in the plan making process and may be in use for the lifetime of the Local Plan in accordance with the Data Protection Act 1998. The information will be analysed and the Council will consider issues raised. Please note that responses cannot be treated as confidential and will be made available for public inspection. All responses can be viewed at the Council offices. If you provide your email address this will be the method of communication used in the future by default unless you advise us otherwise.

Q9 Do you wish to be notified of any of the following?

(please tick yes or no for each question)

**Submission of the Local Plan Part 2 for Examination?
Publication of the Recommendations of the Inspector?
Adoption of the Local Plan Part 2?**

- | | |
|---------------------------|--------------------------|
| <input type="radio"/> Yes | <input type="radio"/> No |
| <input type="radio"/> Yes | <input type="radio"/> No |
| <input type="radio"/> Yes | <input type="radio"/> No |

Part B – Your Response

If you wish to make more than one response you will need to fill out another form for each response.

Q10 What does your response relate to? (please select one only from a-e below).

a) Does your response relate to a site (whether included or not included within the Plan)? (if yes, please specify the site and move to **Q7**)

Which site? (please provide details of the site including ref number and site name. If your comments relate to a site not included in the Plan please provide details so that the site can easily be identified).

- | |
|--|
| <input type="radio"/> Yes |
| <input checked="" type="radio"/> No |
| <input type="radio"/> Site included within the Plan
(please give details)
Site Ref:
Site Name: |
| <input type="radio"/> Site not included in the Plan
(please give details)
Site Name and address:

_____ |

b) Does your response relate to a Policy? (if yes, please give the Policy, give details then move to **Q7**)

Which Policy? (please provide the Policy reference)

- | |
|---------------------------|
| <input type="radio"/> Yes |
| <input type="radio"/> No |

Policy

Does your response relate to the Policy text or justification text?

Which part of the text? (please provide the related Policy criteria or paragraph number)

- | |
|---|
| <input type="radio"/> Policy text |
| <input checked="" type="radio"/> Justification text |

Paragraphs 4.3 to 4.4

c) Does your response relate to another part of the document? (if yes, please state which section then move to **Q7**)

Which part?

- | |
|--|
| <input type="radio"/> Policies Map |
| <input type="radio"/> Section 1: Introduction |
| <input type="radio"/> Section 2: Background |
| <input type="radio"/> Appendix 1: Parking Guidance |
| <input type="radio"/> Appendix 2: Schedule of Proposed Transport Network Schemes |
| <input type="radio"/> Appendix 3: Housing Delivery |
| <input type="radio"/> Appendix 4: Employment Delivery |
| <input type="radio"/> Appendix 5: Retail Delivery |
| <input type="radio"/> Appendix 6: Methodology for Significant HMOs Concentration |
| <input type="radio"/> Appendix 7: Schedule of Caves |

d) Does your response relate to supporting documents? (if yes, please specify which document, then move to **Q7**)

- Yes
 No

Which document?

- Sustainability Appraisal
- Equalities Impact Assessment
- Preferred Option Report of Consultation
- Employment Background Paper
- Retail Background Paper
- Green Belt Background Paper
- Climate Change Background Paper
- Site Assessment Background Paper
- Minerals Background Paper
- Sustainable, Inclusive and Mixed Communities Background Paper
- Transport Background Paper
- Infrastructure Delivery Plan

e) Does your response relate to another item not listed?
(please specify then move to **Q7** where you can provide more details)

Yes (please give details)

Housing provision

Q11 and **Q12** are required by Planning Regulations. Please refer to the [guidance note](#) for more information

Q7 Do you consider the Local Plan Part 2 to be legally compliant? (please tick yes or no)

- Yes
 No

Q8 Do you consider the Part 2 Local Plan to be 'sound'? (please tick yes or no)

- Yes
 No

If you consider that the Plan is unsound, explain why
(please select all that apply and explain in the box to Q9)

a) Do you consider the Plan is unsound because it is **not 'positively prepared'**?

- Yes
 No

b) Do you consider the Plan is unsound because it is **not 'justified'**?

- Yes
 No

c) Do you consider the Plan is unsound because it is **not 'effective'**?

- Yes
 No

d) Do you consider the Plan is unsound because it is **not 'consistent with national Policy'**?

- Yes
 No

Q9 Please explain why you 'support' or 'do not support' the Local Plan Part 2 (ie why you think the Plan is/is not legally compliant/sound). Try and be as precise as possible.

See attached re Housing Delivery

(please continue on a separate sheet if necessary)

Q10 Please set out what change(s) you consider necessary to make the Plan legally compliant or sound, having regard to the reasons you identified in **Q9**. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any Policy or text. Try and be as precise as possible.

See attached

(please continue on a separate sheet if necessary)

Please note your response should cover succinctly all the information, evidence and supporting information necessary to support/justify the response and the suggested change, as there will not normally be a subsequent opportunity to make further responses. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q11 If your response is seeking a change, do you consider it necessary to participate at the examination in person?

- Yes, I wish to participate in person at the examination
- No, I do not wish to participate in person at the examination

Q12 If you wish to participate in person at the examination, please outline why you consider this to be necessary.

To discuss housing supply issues and examine the Council's calculations on supply and delivery.

(please continue on a separate sheet if necessary)

Please note the Inspector will determine who participates at the Examination and the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination.

Responses must be received by 5.00pm Friday 11 March 2016.

Thank you for taking the time to have your say on the Nottingham City Council Local Plan Part 2: Land and Planning Policy Document. For further information about this consultation and / or the Local Plan document please contact: Local Plans team on 0115 876 4594 or email localplan@nottinghamcity.gov.uk

Data Protection - The response(s) you submit on the Local Plan Part 2 will be used in the plan making process and may be in use for the lifetime of the Local Plan in accordance with the Data Protection Act 1998. The information will be analysed and the Council will consider issues raised. Please note that responses cannot be treated as confidential and will be made available for public inspection. All responses can be viewed at the Council offices. If you provide your email address this will be the method of communication used in the future by default unless you advise us otherwise.

Housing Delivery Matters

4296

The Core Strategy, Policy 2, sets out the housing requirements for the City and neighbouring authorities. The delivery requirements are based on an uneven delivery rate, with rates increasing through the Plan period. The difficulties with this approach are that it does not deliver housing at the time needs arise and it does not boost supply. Importantly it also potentially stores up supply/delivery problems until later in the Plan period when there is less opportunity to address shortfalls, both because of the delivery rates that would need to be achieved and the time in which a further increase in delivery is expected to be executed.

Given these issues it is clearly imperative that the City does not fall behind this uneven trajectory, further exacerbating these issues now, in terms of meeting needs now, and storing up insurmountable problems later in the Plan period.

Unfortunately however, this is exactly what appears to have happened. The Council's Annual Monitoring Report (December 2015) shows that the City is falling behind on required delivery rates. Even in a relatively buoyant housing market, as has been experienced over the last few years, and with an uneven back loaded delivery trajectory, the City has been unable to meet its requirements. This is resulting in an increasing shortfall such that it is now highly unlikely that the City will be able, realistically, to meet its housing requirements over the Plan period.

The approach set out in the draft Local Plan Part 2, does not provide the evidence that an appropriate number of 'deliverable' sites are available to meet the housing requirement. Indeed the Plan does not set out in a Policy or supporting text, how the Plan is expected to ensure the City is able to meet its full housing requirement.

The Council have undertaken an exhaustive search for sites, but the combined supply from all the sites identified falls some considerable way short of being able to address the City's full requirements. The City is therefore reliant on windfall sites and the full delivery of all allocated sites, to meet its requirement. The assumptions made are unrealistic and unsound.

Given the exhaustive search for sites, the number of 'unknown' sites which will come forward will be considerably less than previous levels. Furthermore it is unreasonable to expect all the allocated sites to be delivered, and the Council should apply a 10-20% non-delivery allowance to these sites.

It is becoming clear therefore that the City will not be able to meet its housing requirement.

Within this context the Plan is unsound and the Council's approach to the Duty to Cooperate not legally compliant. The Council could undertake a further review of development opportunities in the City, however given the exhaustive exercise already undertaken it is unlikely that additional sites will be identified. There are several key actions that are therefore required:

4296

1. The Council should apply greater flexibility, particularly regarding developer contributions including affordable housing, to help facilitate the delivery of 'marginal' sites which might otherwise not be delivered. The City must ensure that it does all it can to maximise delivery by removing the potential barriers to development.
2. Accept that it will not be able to meet its housing requirement as set out in the Core Strategy. Produce an updated housing trajectory based on reasonable assumptions about delivery rates, windfall and non-supplementation to identify the City's likely shortfall and then, through the Duty to Cooperate work with neighbouring authorities to ensure that the shortfall is addressed.