



BY EMAIL ONLY

Our ref. 14.009 10-03-2016

Planning Policy Team
Nottingham City Council
Loxley House
Station Street
Nottingham
NG2 3NG

10th March 2016

Dear Sir/Madam,

Re: Nottingham City Local Plan Pt 2 - Consultation (March 2016)

P&DG are submitting this representation on behalf of Nottingham Trent University as a response to the consultation on the draft Pt2 Local Plan. As the University's City and Clifton Campus' are covered specifically, we are pleased to have the opportunity to provide comments on the emerging development plan prior to its submission to the Secretary of State for Examination. Our comments are as follows on a policy by policy basis.

PA61 – Royal Quarter, Burton Street Guildhall, Police Station and Fire Station

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Nottingham Trent University remains committed to its city campus and its presence in offering world class learning, teaching and conference facilities within the city. We support the inclusion of this site as an allocation for the variety of uses proposed in the policy wording, as this is considered to be an appropriate mix to facilitate the onward progression of the area in line with the policy and the City Council and University's mutual aspirations to innovate and further the regenerative improvements in this area.

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The success and continued growth and vitality of this area depends upon a suitable 'flagship' site coming forward. In part due to the quality and variety of buildings that already exist, including the Guildhall and adjacent Arboretum Conservation Area, there is already a suitable foundation upon which to bring added value and footfall, maximise the opportunities of the site along all frontages and increase its desirability as a place to live, work, study, enjoy and learn. This is a prominent, highly recognised site in the city centre,

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within the Royal Quarter and on the edge of the Primary Shopping Area. It is agreed that the proposals seek to deliver a variety of regenerative outcomes for Nottingham, making it an altogether more inclusive and accessible area than it is at present and supporting both uses that are more active during the daytime as well as during the evening. The proposals are also supported in that they would deliver a positive degree of change to the footfall on

4298 all street frontages; Burton Street, Shakespeare Street, North Church Street and South Sherwood Street.

4299 The presence of significant heritage assets in the Royal Quarter should not be to the detriment of realising the potential of this site for new development, which can, as part of exemplary and sustainable design techniques, complement each other successfully as has already been demonstrated in other flagship developments in this quarter over the past decade as part of the University Campus.

Policy EE1 – Providing a range of employment sites

4300 This policy is supported particularly for the inclusion of part C which recognises a future need to provide employment sites in association with universities and higher education establishments, and to meet the needs of the technology sector. Certain employers will value
4301 being in close proximity to the University for improved collaborative planning and for research and development and training opportunities. This would also have a wider impact on the regenerative outcomes the City Council is seeking to achieve.

Policy EE4 – Local employment and training opportunities

4302 The policy is supportive, making it easier to obtain a job in the Nottingham by increasing the number of training opportunities available, promoting labour agreements to secure employment during and after the city's regeneration programmes. As a key partner in the
4303 delivery of these outcomes by training highly skilled graduates and seeking their retention in Nottingham after their studies, NTU supports a policy that foresees an altogether more inclusive and accessible process of finding employment and training in the future.

Policy SH4 – Development of Main Town Centre Uses in Edge of Centre and Out of Centre Locations

4304 The policy appropriately acknowledges the role of edge of centre uses adjacent to the City Centre Primary Shopping Area and their potential for significant retail investment and other main town centre uses including offices, leisure, culture and tourism facilities. While it is
4305 acknowledged that proposals must not be detrimental towards the economy of the City Centre, there are a range of key employers that lie on the edge of the Primary Shopping Area, such as NTU, that would create a degree of localised demand for certain land uses and which can help to make the quarters of the city more sustainable. Another dynamic of the
4956 location around the University is its strong links with the entertainment and food and drink industries; the presence of the Theatre Royal, Royal Concert Hall, the Cornerhouse and adjacent venues are likely to remain key destinations in this part of Nottingham where a demand exists for complementary land uses in a short walking distance and near to key
4957 public transport corridors. It is also considered that the presence and attractiveness of residential development in these areas, for instance in parts of the Royal Quarter, would be influenced in part by how vibrant the community is in its service and amenity offer.

Policy RE1 – Facilitating Regeneration

- 4958 We consider the policy's links with Site PA61 in the Royal Quarter to be complementary to one another, to take forward regenerative links desired by the City. With land in short supply
- 4959 in the centre and on its immediate periphery, maximising the potential of sites is essential, not only for viability reasons, but to create long term, positive social, economic and environmental impacts as a true representation of sustainable urban development. In turn
- 4960 this aids the vitality of the immediate area, and the city centre too, as people are encouraged to spend their time and money between both localities during their time in Nottingham.
- 4961 Regeneration provides added competition between markets and locations in the city, adding choice for future occupiers. This would support an NPPF led principle to plan proactively to meet the development needs of business and support an economy fit for the 21st century, where barriers to investment and access to other complementary land uses are improved. A
- 4962 clear regeneration message is the overarching umbrella for achieving this coherently; this could perhaps be improved further by way of linking the policy more closely with the Council and NTU's City Campus Development Accord and its place leadership approach towards the regeneration of place and space.

Policy RE3 – Creative Quarter

- 4963 We support the encouragement of policy to provide specialist training and education facilities that are complementary to the creative industries sector. Such training support is absolutely vital if the knowledge economy is going to thrive and deliver the regeneration opportunities in the quarter. However, we consider that the policy could go further. In line
- 4964 with national planning policy, in endorsing the redevelopment and regeneration of lower quality previously developed site to provide for flagship higher education facilities which have the potential to act as physical and educational gateways to the Creative Quarter.

Policy RE5 – Royal Quarter

- 4965 We support the breakdown of land uses and the strategic aims that the City Council considers to be essential to successfully bringing forward the proposed Royal Quarter. The
- 4966 balance of uses would allow the area to bring additional levels of footfall into the Royal Quarter, its commitment to uses associated with the University, support the city's housing delivery, and encourage new inward investment from businesses, leisure and cultural promoters. We agree with the Council's statement that the proposed balance of uses in the
- 4967 Royal Quarter would diversify the area's offer and support an element of ancillary use to maintain viable levels of footfall in this area. This can be successfully achieved to complement the heritage assets, and with the substantial improvements to the environment and amenity for pedestrians in this area.
- 4968 Within the context of the emerging plan, Nottingham City Council and Nottingham Trent University have been working collaboratively to develop a Regeneration Partnership, appended by a Development Accord for the City Campuses (City Campus and Confetti). These documents seek to establish and develop a partnership approach to place

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management across the dual control of the city estate. With the draft agreement shortly to be signed by both organisations, we consider that paragraph 3.176 should make direct reference to the Development Accord, to ensure that its positive place management message is widely disseminated and understood.

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We consider that the provision of additional employment land in the Royal Quarter would help assist the Council in meeting its objectives for economic development associated with the universities and higher education establishments and their expansion (Policy EE1 part C). Such inward investment not only allows these establishments to continue to expand and broaden their profile within a highly competitive environment, it supports the local economy by offering a range of new full and part time job and training opportunities for local residents, students, as desired by EE1 part D. Training opportunities could have an added

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remit for external users, with the proposed allocation of conferencing facilities in the Royal Quarter would increase the scope for the University to host training and corporate functions, exhibition space and other events.

Policy LS2 – Safeguarding Land for Further and Higher Education Uses

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Direct references in this policy are welcome towards supporting the growth of higher education, research and development and communication technology facilities and relevant ancillary facilities.

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In recognition of the significant new facility at the Confetti Campus and its regenerative and educational potential to support the development and growth of the Creative Quarter, bullet (b) should also make direct reference to the Confetti site. The Confetti Campus is

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currently centred on a block formed by Lower Parliament Street, Huntingdon Street, Beck Street and Convent Street. It is currently a partly connected block of individual buildings and uses all within the ownership of NTU. The block has clear opportunity for consolidation and greater visual and operational unity through partial redevelopment works that will bring the elements together and will form a more logical and identifiable entity. There is potential for a new feature building on the corner of Convent Street and Lower Parliament that will provide greater focus and help to draw together the form of the campus. New development may seek to reflect the quirky, creative nature of the Campus, while respecting the spatial and architectural context. It is intended that the Confetti Campus should emerge as a consolidated and vibrant hub of an invigorated Creative Quarter – innovative, high-tech, creative, buzzing.

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With the University being a key partner in delivering the requirements of this policy, it is also

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welcome that the policy is standalone in its emphasis within the plan. This recognises the value of the University in bringing forward the development of cross campus facilities beyond the successful developments and regeneration projects already achieved by the University during the course of the existing Local Plan period. We consider that the policy

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could usefully go further than simply 'safeguarding' land that is already in the ownership of educational institutions, and should be called 'Supporting the Growth of Further and Higher Education Facilities'. The plan must recognise that in a post-industrial Nottingham, low skills

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4977 are the key threat to the local economy and the city's educational institutions, in partnership with the City Council must take the lead in improving educational expectations. In order to do so, the growth and development of further and higher educational institutions need active support and encouragement to grow and develop. The policy should support opportunities to raise the profile and status of existing facilities to develop world leading establishments.

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4979 NTU's Clifton, City and Confetti Campus sites are instrumental in the University's Business Plan and ambitions to meet anticipated increases in demand from student enrolment, learning and teaching capacity, research and development, conferencing and hospitality facilities. The policy would give support to the University in meeting these ambitions in the future, taking leadership in evolving the knowledge economy, improving the training and skills locally and engendering a workforce that is appropriately trained for the employment offer (both existing and for future growth) across Nottingham.

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4981 With students contributing on average 10% of our cities' economies, further growth of higher education institutions has a proven basis for the economic outputs of the areas in which they are sited; the desire for students to remain in the city after they have graduated and/or to pursue additional degree programmes remains a key driver for the University and key stakeholders in the city alike, with the student experience in Nottingham (learning, teaching, living, socialising and job prospects) being testament to the decision being made to stay.

Proposed Housing Allocation PA57 (Clifton West)

4983 NTU continue to support the delivery of PA57 for an identified 285 dwellings as part of the City's housing requirements, along with the safeguarding works TR2 18. Clifton West is still a deliverable site that can be brought forward early in the plan period to support the City Council in meeting its housing requirement. Along with the desired ecology and landscaping schemes, proposals at this site would be designed sympathetically to the character of the setting and local heritage assets. Its relationship on the edge of the Green Belt and the Landscape Character Area, will assist in creating a desirable location to live within suitable commuting distance of the city, rail, tram and bus links and the motorway in equal measure.

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Overall Summary

4988 The broad intentions of what the new Local Plan is seeking to achieve, its vision, objectives and spatial strategy, are welcomed in principle. It proposes a series of well-defined policy principles for supporting the regenerative, employment and training led growth of the city centre and sees the role of universities and higher education establishments as a significant part of this. The plan appears to have been prepared as a framework that seeks to achieve each of the economic, social and environmental dimensions of sustainable development; the aspects of the plan commented in this representation appear to provide net gains in all three as desired by national policy. Further collaborative work is welcome going forward, perhaps between the City Council and other partners to truly realise the ambitions in the plan.

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I trust that these representations are of assistance to the Council and will be considered during the ongoing preparation of the City's Local Plan. In the meantime if any further information is required please do not hesitate to contact me. We request that we continue to be notified by the City Council as the Local Plan progresses.

Yours Faithfully

Bob Woollard BA (Hons) MA MRTPI
Director