

From: [REDACTED]
Sent: 17 November 2017 16:54
To: Matthew Grant
Cc: Matt Gregory; Joanna Briggs; Martin Poole
Subject: Local Plan Review Consultation

Dear Matthew,

Please find attached the final comments of the Lenton Drives and Neighbours Residents Association on the Local Plan Part 2.

We have tried to incorporate the views of all our group that replied to our consultation, in one way or another. We have nearly 100 members of the group who are long-term residents in the Lenton area, so the comments we have made are representative of the views of many in the community.

Thank you for your support in allowing us the opportunity to submit our comments.

If you have any queries, please do not hesitate to contact me.

Kind regards

[REDACTED]

Chair of Lenton Drives and Neighbours Residents Association

www.lentondnra.co.uk

Comments of the Lenton Drives and Neighbours Residents Association with regard to the review of the Local Plan 2

Policy HO1: Housing Mix

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1. Outside of the City Centre where sites are capable and suitable for accommodating family housing, and in line with Policy 8 of the Core Strategy, the City Council will encourage development of sites for family housing, including larger family housing (within use class C3), as opposed to other forms of residential accommodation.
2. In assessing whether sites are capable and suitable for accommodating family housing, and whether the resulting development will be in character with the local area, the following criteria will be taken into account:
 - a) whether the site is allocated and the corresponding development principles indicate that an alternative use or mix of housing will be more appropriate;
 - b) whether the resulting development would fulfil other regeneration aspirations of the City Council;
 - c) whether local evidence of housing need and demand (such as that set out in the Housing Nottingham Plan) indicates that an alternative mix of housing is appropriate; or
 - d) whether alternative provision meets other aims of the City Council, such as provision for elderly persons (including bungalows) and a proportion of the site can still be developed as family housing.
3. On sites within the City Centre, the mix of housing should address the need to diversify the existing housing stock by including flats of two or more bedrooms. Innovative family housing will be sought as part of the overall housing mix on the City Centre fringes.
4. Where sites provide for 10 or more homes, consideration should be given to including either provision of serviced plots for self or custom builders, and/ or the provision of custom homes by other delivery routes, subject to viability considerations and site specific circumstances. If there is sufficient demand for this type of provision, a SPD may be prepared to provide further guidance on how custom and self-build housing should be delivered on such sites.

5349 The LDNRA broadly approve of the policy wording as given.

5350 However, we would like to see a stipulation that sites capable of providing 30 dwelling houses or more that are located in areas with **less** than 10% C4/Student houses, will be **required** to include suitable student housing, either as purpose built accommodation or as C4 properties at the target rate of 10%. This fits with the Housing Nottingham Plan 2013 aspiration that in order to maintain and promote balanced communities, Nottingham want to encourage more PBSA.

5351 An alternative to including a percentage of student/c4 housing on site could be provided to developers by way of a requirement to purchase (open market) and convert current C4 properties in oversubscribed areas and return them to C3 use by way of an approved scheme (with consultation of council and local resident representatives). This is in line with the Core Strategy aim to assist in enabling existing HMO's to be occupied by other households, thus reducing the concentration of student households.

5352 We would also like to see a policy restricting the provision of 2-bedroom flats in areas with a greater than 10% concentration of C4 properties. It is our experience that a significant proportion of 2 bedroom flats constructed in the Lenton and Dunkirk area have become predominately student occupied. Irrespective of the potential occupiers we find that 2 bed properties are more likely attract residents who have only a short-term interest in the area in which they live. 2 Bed housing does not contribute to building a sustainable community in the Lenton Areas and does not contribute towards the provision of Family Housing.

Policy HO2: Protecting Dwelling houses (Use Class C3) suitable for Family Occupation

In order to both address the shortage of homes throughout the City which are suitable and attractive to families, and to encourage the provision of sustainable, inclusive and mixed communities, there will be a presumption against the loss of dwellinghouses (Use Class C3) for family occupation through either sub-division, conversion to Use Class C4, conversion to other non-residential uses or demolition and redevelopment unless:

- a) the property/properties is/are located within a site allocation and the corresponding development principles indicate that an alternative use or mix of housing will be more appropriate;
- b) the proposed development fulfils other regeneration aspirations of the City Council;
- c) local evidence of housing need and demand (such as that set out in the Housing Nottingham Plan) indicates that an alternative mix of housing is appropriate;
- d) alternative provision meets other housing priorities of the City Council, such as provision for elderly persons (including bungalows);
- e) the property/properties is/are proposed for development of main town centre uses and are located in or on the edge of a defined centre, and are subject to Policies SH2 and SH3; or
- f) an applicant can demonstrate that the property/properties is/are no longer suitable for family occupation, in which case, replacement with a new Class C3 dwellinghouse(s), suitable for family occupation will be the preferred approach, unless one of the criteria set out above can be satisfied.

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The LDNRA welcome the desire to protect use class C3 properties within areas of concentration greater than 10% but object to such protection being extended to areas that do not have an existing oversubscription of C4 properties.

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The Lenton area, parts of Dunkirk, Arbouretum and Radford have suffered significant harm as a result of the continued expansion of the Universities and it is essential that policies are included in the Plan to redress this damage. In areas of Nottingham with good transport links to the university and student accommodation rates less than 10%, such as parts of Wollaton, Bilborough, Broxtowe, Mapperley, Sherwood, The Meadows and Bridge Ward, a proportion of student housing could be supported without prejudicing the social welfare of the host area. Given the total number of students now living in the City (12%) it is difficult to see how the imbalance in resident/student ratio within oversubscribed areas can be addressed without distributing the accommodation more evenly throughout the city and suburbs.

Whilst we concur with the sentiment that family housing is urgently required in the Nottingham City Area, we would suggest that the needs for family housing would be better met by conversion of the existing eminently suitable housing stock located in Lenton, Dunkirk and the Arboretum which has been taken over for C4 usage. Policies that meet this objective will better serve the overall Aims of Nottingham City as a whole.

Policy HO5: Locations for Purpose Built Student Accommodation

Purpose built student accommodation of an appropriate scale and design will be encouraged in the following locations, subject to developers demonstrating that there is a need for additional student accommodation or that they have entered into a formal agreement with a University or another provider of Higher Education for the supply of bedspaces created by the development:

- a) allocated sites where student accommodation use accords with site specific Development Principles;
- b) University campuses;
- c) within the City Centre boundary (as shown on the Policies Map), subject to accordance with site and area specific policies, including relevant 'Quarter Policies' but excluding the areas of predominantly family housing;
- d) above shopping and commercial frontages within defined Town, District and Local Centres, and within other shopping and commercial frontages on main transport routes where this assists in the regeneration of underused sites and premises and is consistent with relevant defined Centre policies;
- e) sites where student accommodation accords with an approved SPD.

5355 Broadly speaking, the LDNRA agree with the intent of the Policy but we are concerned that the policy is too restrictive in terms of location. There are sites within Wollaton, Bilborough, Broxtowe, Mapperley, Sherwood, The Meadows and Bridge where sustainable student accommodation could be located without exceeding a 10% threshold in student numbers and without compromising the social cohesion of the host area. These areas provide good transport links to various campuses. Only in areas where existing concentrations exceed the 10% threshold should additional student accommodation in the form of PBSA or C4 properties be refused.

5356 The policy should be amended to clarify that in areas with existing student accommodation numbers above the threshold 10% threshold PBSA will not be permitted.

We would also like to amend the policy to allow potential developers to create the need by converting existing C4 properties back to C3 usage. We would suggest an amendment as follows: -

"subject to developers demonstrating that there is a need for additional student accommodation or that they have entered into a formal agreement with a University or another provider of Higher Education for the supply of bedspaces created by the development:"

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or:-

subject to developers contributing to a scheme to buy back existing C4 properties from the HMO marketplace in oversubscribed areas and return them to c3 use at rate of 0.8 community bed spaces per provided student bed space thereby creating demand for the proposed development.

In all cases this provides developers with an opportunity to create needed student bed spaces whilst redressing the balance of oversubscription of housing numbers. (There is also potential that this could be used in areas outside a,b,c and d) where it does not conflict with other policies.

Policy HO6: Houses in Multiple Occupation (HMOs) and Purpose Built Student Accommodation

1. Planning permission for the following development will only be granted where it does not conflict with Policies HO1 and HO2 above and does not undermine local objectives to create or maintain sustainable, inclusive and mixed communities:
 - a) changes of use and / or the erection of buildings to create new Houses in Multiple Occupation (HMOs);
 - b) extension / alteration of existing HMOs including development that facilitates an increase in the number of occupiers / bedspaces;
 - c) changes of use and the erection of buildings to create residential accommodation for exclusive occupation by students (e.g. purpose built student accommodation);
 - d) extension / alteration of purpose built student accommodation resulting in an overall increase in the number of student bed spaces.
2. In assessing the development's impact on local objectives to create or maintain sustainable, inclusive and mixed use communities, regard will be given to the following criteria:
 - a) the existing proportion of HMOs and / or other Student Households in the area and whether this proportion amounts or will amount to a 'Significant Concentration' (calculated using the methodology shown in Appendix 6);
 - b) the individual characteristics of the building or site and immediate locality;
 - c) any evidence of existing HMO and purpose built accommodation provision within the immediate vicinity of the site that already impacts on local character and amenity;
 - d) the impact the proposed development would have on the character and amenity of the area or site having particular regard to the criteria set out in Policies DE1 and DE2;
 - e) whether the proposal would incorporate adequate management arrangements, and an appropriate level of car and cycle parking having regard to the location, scale and nature of the development;
 - f) whether the proposal would result in the positive re-use of an existing vacant building or site that would have wider regeneration benefits;
 - g) whether adequate evidence of the need for new purpose built student accommodation of the type proposed has been provided; ~~and~~
 - h) whether new purpose built student accommodation is designed in such a way that it can be capable of being re-configured through internal alterations to meet general housing needs in the future; and
 - i) whether the proposal in respect of purpose built accommodation includes appropriate room sizes and provides adequate communal space/ facilities, and student drop off/ collection arrangements.

The LDNRA are concerned with the wording of policy HO6 and would request that consideration is given to the following elements.

Section 1 c

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1 C) – Why say ‘exclusive use of students’ – please remove the exclusive element. The inclusion of the word exclusive could provide developers with an opportunity to create non-exclusive student development that includes a token “3-bed apartment”

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Section 2

Instead of

In assessing the development’s impact on local objectives to create or maintain sustainable, inclusive and mixed-use communities, regard will be given to the following criteria:

We would prefer

*In assessing the development’s impact on local objectives to create, maintain or **re-establish** sustainable, inclusive and mixed-use communities, regard will be given to the following criteria:*

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In our view the primary point of assessment should be simple and should consist of the following statement.

In areas where student accommodation numbers exceed 10%, planning will not normally be given for PBSA or C4 Dwelling houses. This should form the **principal clause** of policy HO6 and *only* when this criterion is established, should consideration be given to sub-clauses b-j.

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We are particularly concerned by the inclusion of subsection b and c – the intent of these sections is ambiguous and could be interpreted in two completely different ways. It is our view that evidence of existing HMO’s in the vicinity of a proposal site could be used to **support** the conversion of a c4 property or the creation of PBSA.

Both of these sections *could* be interpreted as legitimising creep associated with studentified neighbourhoods. We are of the view that all neighbourhoods in Lenton and Dunkirk could continue to provide acceptable accommodation for families regardless of the percentage of Student HMO’s already present. We find that the more concentrated the area of student housing the more likely it is that anti-social and high-risk behaviour will occur both within and adjacent to these areas. This adjacent impact has, over years, led to long term residents on neighbouring streets becoming disenfranchised with their areas and electing to move out hence the rate of studentification has increased.

Furthermore, we know of local residents suffering extreme distress and harm within areas of the highest concentration of HMO’s. Whilst these areas provide the greatest challenges in respect of rebalancing the community they also offer the greatest potential improvements in terms of the local and wider area. Protecting and rebalancing areas that already have significant concentrations of HMO’s, even at percentages of 80%+, must be a priority of the plan.

Policy LS2: Supporting the growth of Higher Education Facilities

Planning permission will be granted for Higher Education, Research and Development and Information and Communication Technology facilities, and ancillary uses such as accommodation and catering facilities for staff and students, at the following locations as shown on the accompanying Policies Map:

- a) The University of Nottingham (University Park and Jubilee Campus);
- b) The Nottingham Trent University (the Clifton Campus and City Site);
- c) ~~nen~~ Basford Hall [education campus](#);
- d) ~~nen~~ Clarendon [education campus](#).

[In addition, provision is made at PA67 \(intu Broadmarsh Centre\) for a further education Skills Hub in the eastern part of the site.](#)

The Lenton Drives and Neighbours Residents Association (LDNRA) acknowledge the significant benefits our two universities bring to the City. However, there is now ample evidence to suggest that the negative social and environmental impacts of the universities' expansions in the last 20 years, far outweigh any benefit to the communities in which the universities are located. The LDNRA do not, therefore, agree with the wording or justification in regard to this policy in respect of a and b.

We believe a benefit to the overall Local Plan would be to make a direct link between planning permission for further development of either university, and methods to alleviate the negative impacts caused in past years from the largely uncontrolled loss of family housing in neighbouring communities to C4 student HMOs.

Further expansion of either of the two universities and a concomitant increase in student numbers without an accommodation requirement will exacerbate the already extreme social imbalance in key areas of the City. As the City is concerned about this, it is incumbent upon it to develop policies that complement the NPPF and actively contribute not only to sustainable development but returning balance to residential neighbourhoods. The development of the Universities and the rapid expansion of student numbers have over-ridden the needs of families and neighbourhoods. The current expansion of purpose built student accommodation has not, as intended, significantly reduced the over-concentration of students in Lenton or Arbouretum.

The LDNRA does welcome the contribution that both Universities make to the City but would wish to highlight that the Universities did not foresee or act to minimise the impacts on family housing and social cohesion resulting from thousands of students choosing to live off-campus.

We believe that future, well managed development of the university could bring benefits to the community.

Any policy related to the development of either University must include conditions that the development must be demonstrated not to prejudice the aims of policies HO1-H06.

We would suggest that the policy could be reworded/ appended as follows: -

Permission will only be granted where it does not conflict with policies H01-H06 and that any proposed expansion will not increase the strain, but reduce the strain on existing housing stock by: -

- a) Increasing the demand for HMO's within the oversubscribed areas as defined in policy HO?
- b) Increasing the likelihood of existing HMO's being expanded under permitted development rights to accommodate greater numbers
- c) Dilute the impact of planned or consented Purpose-Built Student Accommodation in reducing the demand in the oversubscribed areas.

In practice, the Universities should demonstrate that proposed development will not serve to attract or encourage increasing numbers of students to study at either university without sufficient accommodation being built to accommodate them.

Moreover, we would suggest that any development of the University given consent, should include suitable 106 clauses requiring the University to submit audited numbers on a yearly basis showing that numbers using the facilities have not increased on the 5-year preceding average.

Should the Universities not be able to commit to expansion without prejudice to the aims of HO1 – HO6 and in circumstances where the proposed development would serve to increase the demand for student accommodation we would suggest that development could be accommodated by the university proceeding one of the following ways:

- a) The University must provide accommodation for the increased numbers in purpose built student accommodation at a rate of 1.2 places for every potential additional student (20% betterment required). Such accommodation must not prejudice the aims of H01-H06 and must be sited in an area where current student occupation is less than 10%.

Or

- b) The university must commit to a scheme whereby existing HMO's within the oversubscribed areas are purchased by the university and brought back into C3 occupation. Such a scheme, including location of properties, to be agreed between the University, City Council and Community Representatives. Such a scheme should be implemented at the rate of 0.8 community bed spaces per additional student.

LDNRA's reasoning behind a lower number of community bed spaces per additional student in option b is the hope that the Universities would be more willing to adopt this scheme, thus working towards rebalancing the community by replenishing the family housing stock. Provision of additional required accommodation could continue to be provided by private developers of PBSA's, thus a continued economic benefit to the local workforce. In this scenario, the University gets to carry out their development, the balance in nearby communities is improved, students are provided with accommodation and the local economy still benefits. There is no doubt that this is a win win situation for all involved.

Land Allocations

PA54 Boots site

PA86 Thane Road

The availability of these two development sites provide clear opportunity to accommodate significant numbers of PBSAs in locations with good transport links to the University of Nottingham and the City. Furthermore, current proposals do not include for sufficient student housing within the allocation. The areas in which these parcels are sited have no immediate residential neighbours and could accommodate a substantial number of student bed spaces that could alleviate the existing pressure on residential areas within the city. Provision could be by way of PBSAs, but also by the provision of C4 dwelling houses designated for student accommodation – thus providing the shared living facility that some desire.

Allocations of this size are rare within the Nottingham City boundary and failing to include substantial student housing numbers on this site in such close proximity to the university, would represent a significant missed opportunity to repair some of the damage to communities elsewhere.

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These comments have been written following consultation with members of the LDNRA.

Below area an example of some of the thoughts of residents behind our comments.

“While the accommodation of nearly 20,000 students in the general housing stock has had an undermining effect on local objectives to create and maintain sustainable and mixed communities due to the loss of family houses and the negative social, economic and environmental effects on neighbourhoods, Policy HO5 in encouraging purpose built student accommodation is not sufficiently explicit on how the policy serves to rectify the profound problems accommodating students has created. In fact, if students continue to choose tenancies in the general housing stock and there is no further demand for additional student accommodation demonstrated, purpose built student accommodation will not be built. This approach does little to improve the neighbourhoods with over concentrations of houses in multiple occupation and students. The Housing Nottingham Plan 2103 is clear that in order to promote and maintain balanced communities, Nottingham wants to encourage more purpose built student accommodation, understanding that where student housing reduces the need for possible interventions to bring about a return to family housing.

While some data indicate student occupation has shown signs of falling in the neighbourhoods close to the universities as a result of purpose built student accommodation it does not weigh the increases in bed spaces through permitted development in the same neighbourhoods. There is very little indication of houses in multiple occupation returning to family houses.

If it is accepted that shared accommodation within private rented housing close to the universities remains the preferred choice for some students, then Policy HO5 is conflicted between accommodating students and promoting and maintaining balanced communities. The policy cannot have it both ways.

The Local Plan aims at stopping the rot through Policy HO2, the Article 4 and by Policy HO6, and reduce the demand on the general housing stock without a clear intent at the rectification of the damage already done to family housing and neighbourhoods. The Local Plan would achieve more consistency with the Housing Nottingham Plan 2012-2015 by being explicit on its intention to return houses of multiple occupation to family homes.

It is not well demonstrated how purpose built student accommodation will play a broader role in the creation of sustainable communities in those communities already made unsustainable by student accommodation.” AL, member of LDNRA

- I want to live in a vibrant and healthy Lenton
- I value diversity in the community and enjoy the variety of people here
- I recognise that in the past the Council have allowed the Universities to expand without a balanced growth plan and the University (not sure about Trent) have grown without due regard to the impact on their local community and as a result the community of Lenton has become unbalanced with too many students taking over the housing stock with a detrimental affect on the vibrancy and health of the community and its amenities.
- I recognise that the Council is now creating a policy of rebalancing the community in Lenton and encouraging families back into the area and that planning policy should reflect this.
- I do not believe that the University takes responsibility for, or is concerned with, the detrimental effect it's students and it's growth plans have on this community CT Member of LDNRA