



Nottingham
City Council

Nottingham City Council
Local Plan Part 2: Land and
Planning Policies Document
Revised Publication Version

Ref:

For office use only

Response Form

A number of changes have been made to the previous 'Publication Version' of the Local Plan. These changes cover Site Allocations and Development Management Policies with additions shown in blue underline and deletions in ~~red strikethrough~~ in the Revised Publication document. A full schedule of changes is also available as are updates/addendums to the supporting documentation and these can be found at www.nottinghamcity.gov.uk/revisedpublication. This consultation is focusing on these changes and comments made in response to the previous 'Publication Version' consultation need not be repeated.

You are advised to read the [guidance note](#) before completing this form, but if you have any questions, please email the Planning Policy and Research Team 0115 876 4594 or localplan@nottinghamcity.gov.uk

Please return this response form to localplan@nottinghamcity.gov.uk

The Council is encouraging electronic responses for ease of processing, however, should you need to submit comments in writing, these should be addressed to:
Local Plan Revised Publication Consultation, Planning Policy and Research Team, Nottingham City Council, LH Box 52, Loxley House, Station Street, Nottingham, NG2 3NG.

Responses must be received by 5.00pm Friday 10th November 2017

Part A – Contact Details and Future Notifications

Please tick the boxes as appropriate.

Q1 Are you responding as?

- An individual
 A Landowner/Developer
 An 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.
3653 _____

Q3 Your Details

Title	Mr
First Name	James
Last Name	Cook
Job Title (if relevant)	Planning Manager (North)
Organisation (if relevant)	Veolia ES Nottinghamshire Ltd

Q4 Agent's Details (if relevant)

N/A

Address Line 1	FAO: Julie Adams	
Address Line 2	Trentside Offices	
Address Line 3	Freeth Street	
Address Line 4	Nottingham	
Address Line 5		
Post Code	NG2 3GT	
Telephone Number		
E-mail Address		

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? ✓Yes ○ No
Publication of the Recommendations of the Inspector? ✓Yes ○ No
Adoption of the Local Plan Part 2? ✓Yes ○ No

Part B – Your Response

If you wish to comment on more than one issue please complete a separate form for each response (although you only need to complete Part A once).

Q6 If you know the Proposed Change reference number provided in the Schedule of Changes to the Nottingham City Land and Planning Policies Development Plan Document (Local Plan Part 2), Publication Version, please provide it and move to Q8.

Proposed Change reference: _____

Q7 Alternatively, if you do not know the Proposed Change reference please answer the following questions:

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

a) A site? (if yes, please specify the site and move to Q8)

Which site? (please provide details of the site including ref number and site name).

✓ Yes ○ No

○ **Please give site details:**
Site Ref: PA82 & PA83 _____
Site Name:
Freeth Street & Daleside Road,
Trent Lane Basin _____

b) A Policy? (if yes, please give the Policy reference then move to Q8)

Which Policy? (please provide the Policy reference)

✓ Yes ○ No

Policy Ref _____
RE8 - Waterside _____

Policy text or justification text?

✓ **Policy text**
✓ **Justification text**

Which part of the text? (please provide the related Policy criteria or paragraph number)	See below response_____
c) Another part of the document? (if yes, please state which section then move to Q8)	<input type="radio"/> Yes <input type="radio"/> No If yes, please specify which section below.

Which section?	<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
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d) Supporting documents? (if yes, please specify which document, then move to Q8)	<input type="radio"/> Yes <input type="radio"/> No
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Which document? (e.g. Sustainability Appraisal)	_____ _____
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e) Another issue? (please specify then move to Q8)	<input type="radio"/> Yes (please give details) _____ _____ _____
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Q8 and Q9 are required by Planning Regulations. Please refer to the guidance note for more information.

Q8 Do you consider the Local Plan Part 2 to be legally compliant? (please tick yes or no and explain in the box to Q10. You will also need to answer Q9).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Q9 Do you consider the Local Plan Part 2 to be 'sound'? (please tick yes or no).	<input type="checkbox"/> Yes (go to Q10) <input checked="" type="checkbox"/> No (answer a-d below)
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a) Do you consider the Plan is unsound because it is not 'positively prepared'?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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b) Do you consider the Plan is unsound because it is not 'justified'?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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c) Do you consider the Plan is unsound because it is not 'effective'?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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d) Do you consider the Plan is unsound because it is not 'consistent with national Policy'?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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If you consider that the Plan is unsound, explain why in the box to Q10).

Q10 Please explain why you 'support' or 'do not support' the Proposed Changes set out in the Revised Publication Version of the Local Plan Part 2 (i.e. why you think the Plan is/is not legally compliant/sound). Try and be as precise as possible.

Veolia ES Nottinghamshire Ltd (referred to as 'Veolia') was awarded the long-term Waste Disposal Contract with Nottinghamshire County Council in 2006. Veolia is responsible under the Contract to provide waste management facilities to deliver more sustainable waste management and contribute towards meeting national and local waste targets. A key element of Veolia's solution is the network of Transfer Stations across Nottinghamshire allowing recyclable and residual waste material to be transported more efficiently to recycling, recovery and disposal facilities. The Freeth Street Transfer Station forms part of this essential, long-term network and must be adequately safeguarded through the life of the Local Plan.

Given the strategic significance of Veolia's Freeth Street facility which has a clear need for safeguarding of the facility, in line with WCS10 of the Nottinghamshire & Nottingham Waste Core Strategy, and the implications for this strategic cross-boundary issue to be addressed with the County Council prior to submission.

This is also supported by national planning policy. Paragraphs 109 and 123 of the National Planning Policy Framework state "*planning policies and decisions should aim to...avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development*" and "*planning policies and decisions should aim to recognise that...existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established*".

Similarly, Paragraph 8 of the National Planning Policy for Waste states that local planning authorities should ensure that the impact of proposed, non-waste related development on existing waste management facilities is acceptable and does not prejudice the waste hierarchy and/ or the efficient operation of facilities.

The current policy, as drafted, does not adequately satisfy local or national policy requirements.

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Q11 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 Q10. 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.

Veolia is pleased to note that the City Council has moved some way towards addressing our previous objections to the Revised Publication Plan and now recognises the importance of Veolia's existing strategic facility to local, long-term waste management across Nottinghamshire.

To be considered 'sound' Veolia request the following changes to the wording of Policy RE8 (Waterside) and associated background text:

- Explicitly require proposed developments contribute towards the potential relocation of existing businesses which the City Council deem non-compatible with the regeneration of the Riverside. Veolia have no plans to relocate its existing operational facility. If the

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cont

City Council deems this activity to be incompatible to the regeneration of the Riverside area then Policy RE8 must require proposed developments contribute towards any relocation onto a comparable, alternative site;

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- The wording of Policy RE8 (Waterside) should go further and explicitly reference a minimum stand-off/ buffer to afford the transfer station sufficient safeguarding for the life of the Plan or until relocation occurs. This should be backed by suitable evidence reflecting the scope of consented activities at the facility. The stand-off is mentioned in paragraph 3.189b of the Background Text but is not required as a mitigation measure;

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- Further reference to the Freeth Street Transfer Station as a strategic waste management facility forming an essential element of sustainable waste management infrastructure for Nottinghamshire;

With reference to the above, we would like to make the following more specific wording suggestions and request further discussions are held with the City Council ahead of submission:

Policy RE8: Waterside (suggested changes in red and strikethrough):

Within the Waterside area, as shown on the accompanying Policies Map, planning permission will be granted for development that is consistent with and does not undermine the delivery of the following strategic aims:

- a) provision of new housing (including custom build) that exploits the riverside and canal setting comprising predominantly family housing. Other forms of residential accommodation formats are acceptable above active frontages on Meadow Lane and Daleside Road, delivered as part of mixed use schemes.

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Developments will be expected to contribute towards the relocation of any uses deemed by the City Council to be incompatible to the regeneration aims of the Waterside.

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Prior to the relocation, of such uses incompatible with the regeneration aims of the Waterside, any residential development proposals or other sensitive uses shall include adequate mitigation (including an adequate stand-off/ buffer), where this is required, to avoid adverse impacts on new occupiers and existing consented uses and businesses;

- b)

Background Text (proposed changes in red):

3.189a The Nottingham Core Strategy identifies the Waterside as a priority for regeneration. However, there are a number of existing businesses in the Waterside which may not be compatible with the long term regeneration aspirations for the area, in particular, the presence of existing waste management facilities ***(including a strategically significant facility for the long-term management of some of the County's waste)***,

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and Policy WCS10 of the Nottinghamshire and Nottingham Waste Core Strategy seeks to safeguard the operation of waste management facilities.

3.189b Residential or other sensitive development in close proximity to these existing facilities is unlikely to achieve a satisfactory environment or be compatible with existing operations. Therefore, in order to deliver the planned comprehensive and sustainable

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regeneration of the area it may be necessary for development proposals to make provision for **by contributing towards** the timely relocation of existing facilities. Such development proposals should be sensitively phased with regard to operational needs **of the existing strategic waste management facility,** and relocation undertaken in a manner which minimises disruption to both the proposed development and existing **operational** facilities. Prior to relocation of these facilities, residential proposals (or other appropriate uses as set out in the Development Principles) may **will** need to make provision for interim **substantial** stand offs, buffers to active operations, ~~or~~ **and** the incorporation of other forms of mitigation such as screening or landscaping strips. Careful layout design will also be required to protect both the amenity of new occupiers and existing business operations **which will continue to serve the wider strategic need of Nottinghamshire and the City of Nottingham.**

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The suggested amendments above should also be reflected in the 'Development Principles' of PA82 Waterside - Freeth Street and the adjoining PA83 Waterside - Daleside Road, Trent Lane Basin.

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 may not 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.

Q12 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

Q13 If you wish to participate in person at the Examination, please outline why you consider this to be necessary.

It is essential that Veolia is afforded opportunities to emphasis the importance of the operational transfer station to: i) Veolia's existing business, ii) fulfilling contractual obligations and iii) providing a secure sustainable waste management service to residents across Nottinghamshire.

The facility has been constructed for long term waste management needs and must be afforded adequate safeguarding to fulfill its role throughout the life of the Local Plan.

In the interim period, ahead of submission and Examination, Veolia would be willing to meet with the City Council to resolve any remaining difficulties with the wording of the proposed policies.

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 on Friday 10 November 2017.

Thank you for taking the time to have your say on the Nottingham City Council Local Plan Part 2: Land and Planning Policies Document. You are kindly requested to complete the Equality Opportunities Monitoring questions on page 6, however this is OPTIONAL.

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 although address, telephone and email details will not be published.. 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.