
Nottingham City Council

Response to Matter 2

Spatial Strategy



Nottingham
City Council

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Issue 1: Spatial Strategy

Q1. Does the Plan accord with the vision and objectives set out in the ACS?

- 2.1 Yes. Para 2.1 to 2.5 of the LAPP explain the relationship between the LAPP and the ACS, clarifying that together they form the statutory development plan for Nottingham City. It refers to the vision set out in the ACS, and summarises the 12 spatial objectives set out in more detail in the ACS ([LAPP-CROSS-01](#)). (The Spatial Vision is section 2.3 of the ACS, whilst the Spatial Objectives is at section 2.4).
- 2.2 The LAPP's purpose is to implement the strategic policies of the ACS. The policies of the LAPP are broken down into sections reflecting the structure of the ACS Delivery Strategy, and LAPP Table 1 (page 8) shows how each LAPP policy relates to the appropriate ACS policy. The range of development management policies and site allocations are considered to fully accord with the vision and objectives set out in the ACS.
- 2.3 Policy SA1 Site Allocations was a new policy introduced at the LAPP's Revised Publication stage to clarify the status of the site allocations, and this policy has been missed from Table 1. A Post Submission change (PPSC13) is therefore proposed to the table, to include Policy SA1 as the last line under the "Making it Happen" theme.

PPSC number	Para Ref/Policy	Change		
PPSC13	Table 1	Theme	Core Strategy Policies	LAPP Policies
		<u>Making it Happen</u>	<ul style="list-style-type: none"> • <u>Policy 2: The Spatial Strategy</u> • <u>Policy 4: Employment Provision and Economic Development</u> • <u>Policy 5 Nottingham City Centre</u> • <u>Policy 6: Role of Town and Local Centres</u> 	<ul style="list-style-type: none"> • <u>SA1: Site Allocations</u>

Q2. Does the Plan accord with the spatial strategy in the ACS, in particular with respect to:
i. the identification and assessment of reasonable alternatives;
ii. the overall scale and distribution of development; and
iii. the removal of land from the Green Belt?

- 2.4 Yes. Policy 2 of the ACS sets out a strategy of urban concentration and regeneration. It states that most new development will be in or adjoining the main built up area of Nottingham. Given Nottingham City's tight administrative boundaries,

there are no reasonable alternatives to the overall strategy, and therefore a limited number of reasonable alternative sites have been proposed.

- 2.5 For development management policies, all reasonable alternatives put forward by the Council or suggested by representations have been tested through SA and addendums ([LAPP-CD-REG-08](#), [LAPP-CD-REG-09](#), [LAPP-CD-REG-10](#)).
- 2.6 For sites, reasonable alternatives were subject to a comprehensive assessment process. Nottingham City is a tightly constrained area, so sites were not excluded on the basis of their geographic location, as the ACS is based on a strategy of urban concentration and regeneration. For this reason, relatively few sites assessed as reasonable alternatives were rejected through the site selection process.
- 2.7 The sites were subject to the process set out at para 6.12I to 6.12O (page 189 of the LAPP). Of particular relevance are the Site Assessment Background Paper and Addendums ([LAPP-CD-BACK-04](#), [LAPP-CD-BACK-05](#), [LAPP-CD-BACK-06](#)) which give more detail on site selection, and also include conclusions from the SA for all sites, including reasonable alternatives.
- 2.8 Section 2 of the Site Assessment Background Paper ([LAPP-CD-BACK-04](#)) sets out the rationale for site selection for sites over 0.5 hectares (the threshold for allocation in the plan), and other factors such as:
- Site assessment (assessment of physical site characteristics, planning status and so on);
 - Green Belt Assessments;
 - Sustainability Appraisal;
 - Equalities Impact Assessment; and
 - ACS and National Policy.
- 2.9 Note that Issue 7 (Approach to Site Allocations), question 5 sets out further detail on the site allocation process.
- 2.10 The identification and assessment of reasonable alternatives has resulted in a suite of allocated sites comprising sustainable development capable of accommodating the objectively assessed need for development in Nottingham City.

ii. the overall scale and distribution of development; and

(a) Housing

- 2.11 Policy 2 of the ACS sets out Nottingham City’s housing requirement as a minimum of 17,150 new homes between 2011 and 2028. The provision is stepped with lower anticipated annual completions at the beginning of the period increasing in the middle and end of the plan period as follows:

Table 1: Nottingham City’s Minimum Housing Provision over the Plan Period (2011-2028)

	2011 - 2028	2011 - 2013	2013 - 2018	2018 - 2023	2023 - 2028
ACS Provision	17,150	950	4,400	5,950	5,850

- 2.12 The submission version of the LAPP provides for a total of 18,767 new homes, including homes completed since 2011, LAPP allocated sites, non allocated sites and windfall sites. The figures are net, i.e. they take account of demolitions.
- 2.13 Thus the submission version of the LAPP provides for a buffer of around 1,600 homes (or 9.4%) above the minimum requirement set out in the ACS. This is considered to be an appropriate buffer to allow flexibility should sites not come forward as anticipated. Note that Matter 4 includes more detail on housing provision, including proposed Post Submission Changes which update the housing position.

(b) Employment land

- 2.14 Strategic policies to provide for the employment needs of the area are set out in Policy 4 of the ACS. However, Councils across the Nottingham Core Housing Market Area (HMA) and the Nottingham Outer HMA commissioned planning consultants in 2014 ([LAPP-EMP-01](#))¹ to provide a more up-to-date assessment of employment land and office floorspace needs that has led to slight revisions to the quantity and distribution of employment space, as set out in the Employment Land and Economy Background Paper ([LAPP-CD-BACK-01](#)). The table below shows the revised distribution (column A), the distribution included in the ACS (column B) and comparison between the two (column C).

Table 2: Industrial, Warehouse and Office Distribution Across Greater Nottingham

	A		B		C	
Council	Revised distribution		ACS provisions		ACS comparison	
	<i>I+W ha</i>	<i>Office Sq. m</i>	<i>I+W ha</i>	<i>Office Sq. m</i>	<i>I+W ha</i>	<i>Office Sq. m</i>
Broxtowe	15	34,000	15	34,000	same	same
Erewash	10	42,900	10	42,900	same	same
Gedling	19	10,000	10	23,000	+ 9	- 13,000
Nottingham City	25	253,000	12	253,000	+ 13	same
Rushcliffe	50	80,000	20	67,900	+ 30	+12,100
Core HMA	119	419,900	67	420,800	+52	-900

¹ Employment Land Forecasting Study Nottingham Core HMA and Nottingham Outer HMA, Nathaniel Lichfield and Partners, August 2015.

2.15 Thus for Nottingham City, the LAPP provides for a requirement for around 253,000 sqm of offices and 25 hectares for industry and warehousing. The office target is Gross External Area (GEA), but the figures in the LAPP at Appendix 4 are expressed as Gross Internal Area (GIA). The target of 253,000 sqm GEA equates to a target of around 246,700 sqm GIA. Since 2011, 18,841sqm have been developed for offices leaving a remainder of 227,859sqm to allocate. Since 2011, 2.36 hectares have been developed for industry and warehousing, leaving a remainder of 22.64 hectares to allocate. Appendix 4 includes details of how these requirements are anticipated to be met, showing provision as a range.

(c) Other development

2.16 The ACS policies do not quantify other development needs, although they do provide location guidance for town centre uses and other cultural and leisure facilities, and for locational preferences for certain house types. Where these are provided for in the LAPP, the distribution accords with the guidance in the ACS.

iii. the removal of land from the Green Belt?

2.17 Please note that the City Council's response to Matter 3 – Green Belt is also relevant to this question.

2.18 The principle of Green Belt review is set out in ACS Policy 3. Policy 3 Section 2 includes a sequential approach to guide site selection, with Green Belt release only being considered after non Green Belt sites have been considered, whilst Policy 3 Section 3 sets out criteria for the review of the Green Belt boundaries.

2.19 The 2012 NPPF ([LAPP.NCC14](#)) includes guidance on Green Belt review. However, the process followed by the LAPP is considered to also be in accordance with the 2018 NPPF, in particular the need to promote sustainable patterns of development, and when releasing land for development giving first consideration to previously developed land, and offsetting the impact of removing land from the Green Belt by compensatory measures. All changes are justified and evidenced in the Green Belt Background Paper ([LAPP-CD-BACK-12](#)).

2.20 Only one development site is proposed for removal from the Green Belt by the LAPP, PA59 – Farnborough Road - Former Fairham Comprehensive School. This is a brownfield site adjacent to the built up area, capable of delivering defensible boundaries and where compensatory measures are proposed in terms of open space/nature conservation enhancements. Further information on this allocation in the context of Green Belt review is set out at pages 46 to 49 of the Green Belt Background Paper ([LAPP-CD-BACK-12](#)).

2.21 Further changes to the Green Belt are proposed through the LAPP, but these are being implemented to correct previous drafting errors, to reflect actual development patterns or follow clearer defensible boundaries. All of these changes are minor, but the need to accurately reflect defensible Green Belt boundaries in the LAPP is considered to constitute exceptional circumstances, and is fully evidenced and justified in the Background Paper.

Post Submission Changes as a Result of this Statement

2.22 One Proposed Post Submission Change (PPSC13) is proposed as a result of this hearing statement, to table1 of the LAPP, to include Policy SA1 as the last line under the “Making it Happen” theme:

PPSC number	Para Ref/Policy	Proposed Post Submission Change		
PPSC13	Table 1	Theme	Core Strategy Policies	LAPP Policies
		<u>Making it Happen</u>	<ul style="list-style-type: none"> • <u>Policy 2: The Spatial Strategy</u> • <u>Policy 4: Employment Provision and Economic Development</u> • <u>Policy 5 Nottingham City Centre</u> • <u>Policy 6: Role of Town and Local Centres</u> 	<ul style="list-style-type: none"> • <u>SA1: Site Allocations</u>