

Greater Nottingham  
Planning Partnership



# Preferred Approach: Assessment of Housing Need and Capacity in Nottingham City

December 2022



**This page is deliberately blank**

## **Contents**

- 1 Purpose**
- 2 Housing Delivery, Housing Need and Housing Supply in Nottingham City**
  - **Background**
  - **Housing Delivery**
  - **Housing Need**
  - **Housing Supply**
- 3 Boosting the Supply of Housing**
- 4 Approach to Identifying Supply**
  - **Strategic Housing Land Availability Assessment (SHLAA)**
  - **Windfall**
  - **Density Assumptions**
  - **Greater Nottingham Growth Options Study, 2020 (AECOM)**
- 5 Sources of Housing Supply**
  - **Student Housing**
  - **Greenfield Development**
  - **Green Belt**
  - **Brownfield Sites**
  - **Brownfield Register**
  - **Employment Land**
  - **City Centre**
- 6 Proactive Action to Boost Housing Supply**
- 7 Balancing the Maximum Development with Other Factors**

## **1 Purpose**

- 1.1 In short, this paper provides evidence to show to what extent Nottingham City Council is capable of meeting its own housing need which includes a 35% uplift to that need, imposed on those urban local authorities in the Government's top 20 cities and urban centres list.
- 1.2 The National Planning Policy Framework 2021 (NPPF) requires local planning authorities to determine the minimum number of homes needed for their area, informed by a local housing need assessment, conducted using the government's standard method as set out in national planning policy guidance (PPG), unless exceptional circumstances justify an alternative approach.
- 1.3 The standard method in the PPG ([Housing and economic needs assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-and-economic-needs-assessment)) uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The standard method identifies a minimum annual housing need figure. (It does not produce a housing requirement figure, and there may be good reasons for planning for a level of housing either above or below the identified need.)
- 1.4 Once the standard need has been calculated, a 35% uplift is then applied for those urban local authorities in the top 20 cities and urban centres list. Currently Nottingham City is one of the 20 on the list.
- 1.5 Prior to the introduction of the 35% uplift, Nottingham City was projected to be able to meet its own housing need for the proposed Strategic Plan period to 2038 within its administrative boundaries. However, it is not projected to be able to meet the 35% uplift in full.
- 1.6 In order to justify a housing target and level of provision for Nottingham City in the Greater Nottingham Strategic Plan that is lower than the full amount of housing indicated by the standard method, it is important to demonstrate that Nottingham City is maximising the opportunities to develop housing within its own area, and meeting as much of its housing need plus 35% as is possible.

## **2 Housing Delivery, Housing Need and Housing Supply in Nottingham City**

### **Background**

- 2.1 Currently Nottingham is the smallest of the eight English Core Cities geographically (7,461 hectares), and in 2020 had a density of 45.2 residents per hectare, the second highest of the Core Cities.
- 2.2 The City Council is a strong promoter of new housing development, for a number of reasons:-
  - It supports regeneration by bringing brownfield land and buildings back into productive use, and drives up land values, enabling other development to be more viable.

- The more housing is provided, the more affordable housing is also provided, and the City Council's affordable housing need is the highest of the Greater Nottingham Councils.
  - It supports revenue, through additional Council Tax (with the exception of student housing) and New Homes Bonus payments, and brings more spending to local centres, services etc.
  - Jobs are provided during the construction phase, and for some types of housing (especially student housing) for the operational phase too.
- 2.3 It is also of note that the City has the largest employment base of the partner Councils, with significant net in-commuting to employment opportunities from all the partner Councils, and providing regional centre facilities to Greater Nottingham residents such as shopping, leisure and culture. These aspects need to be considered alongside the delivery of housing.

### **Housing Delivery**

- 2.4 Nottingham City is a highly sustainable location, and has a key objective of regenerating both the City Centre and its neighbourhoods. Indeed, Theme One of the emerging Nottingham City Housing Strategy is proposed to be "Driving housing growth and regeneration for a green and prosperous Nottingham" which is about supporting developers to deliver new homes to support the Council's broader strategic context, including the economic growth of the City and its regeneration.
- 2.5 In line with this ambition, Nottingham has a history of strong housing delivery as a result of promoting new housing development, and has exceeded the housing provision set out in its Part 1 Local Plan (Aligned Core Strategy 2014) in 9 of the 11 past years (2011-2022) by a total of 2,301 homes. This equates to an average of 1,128 new net homes per year (i.e. taking into account demolitions).

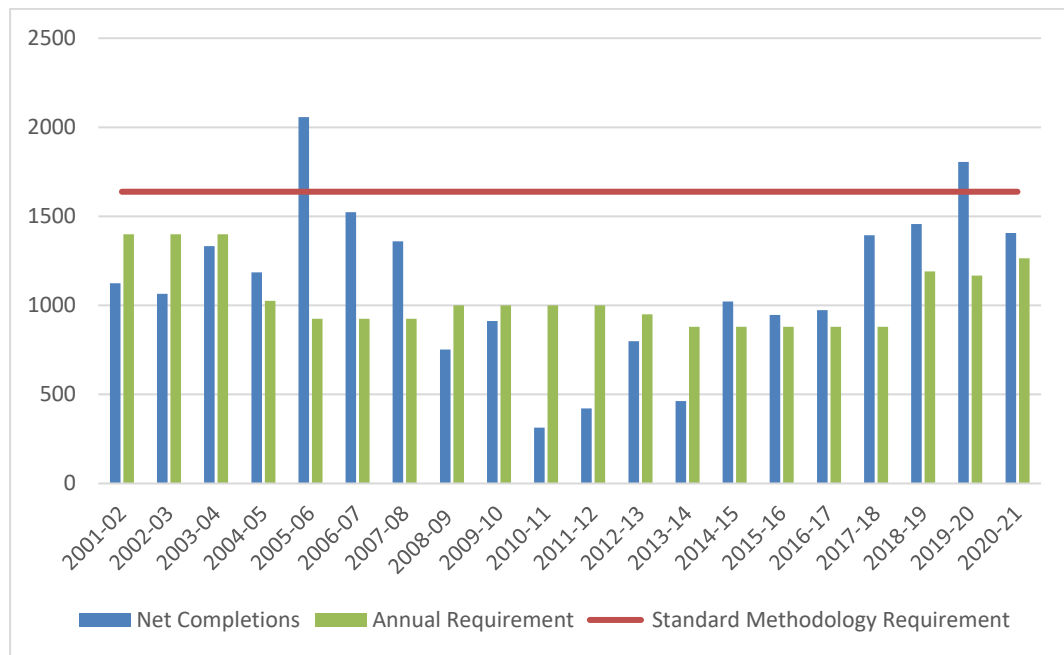
**Figure 1 – Housing Delivery in Nottingham vs Local Plan Provision**

	Nottingham City Council (Local Plan provision)	Nottingham City Council (actual completions)
<b>2011 to 2022</b>	<b>10,110</b>	<b>12,411</b>
<b>2011 to 2012*</b>	475	422
<b>2012 to 2013*</b>	475	799
<b>2013 to 2014</b>	880	463
<b>2014 to 2015</b>	880	1,022
<b>2015 to 2016</b>	880	947
<b>2016 to 2017</b>	880	974
<b>2017 to 2018</b>	880	1,393
<b>2018 to 2019</b>	1,190	1,456
<b>2019 to 2020</b>	1,190	1,806
<b>2020 to 2021</b>	1,190	1,407
<b>2021 to 2022</b>	1,190	1,722

### **Housing Need**

- 2.6 The annual housing target for Nottingham according to the standard methodology at April 2022 (including 35% uplift) is 1,773 homes per year. The 35% uplift represents an **extra 460** homes per year over the base need of 1,313. The scale of the challenge in delivering this target can be illustrated by comparing it to past performance, as shown in figure 2, below. 1,773 new homes per year is significantly above past delivery rates, with a **10 year delivery average of 1,199** and a **20 year delivery average of 1,146 homes per year**. The annual requirement of 1,773 has only been exceeded in one year in the last 10 years (which is 2019/20) and in two years in the last 20 years (2005/06 and 2019/20).
- 2.7 In terms of the emerging Strategic Plan 2022-2038, the 35% uplift gives a total housing need of 28,368 and equates to an additional 7,360 dwellings to the City's base requirement of 21,008 from 2022-38.

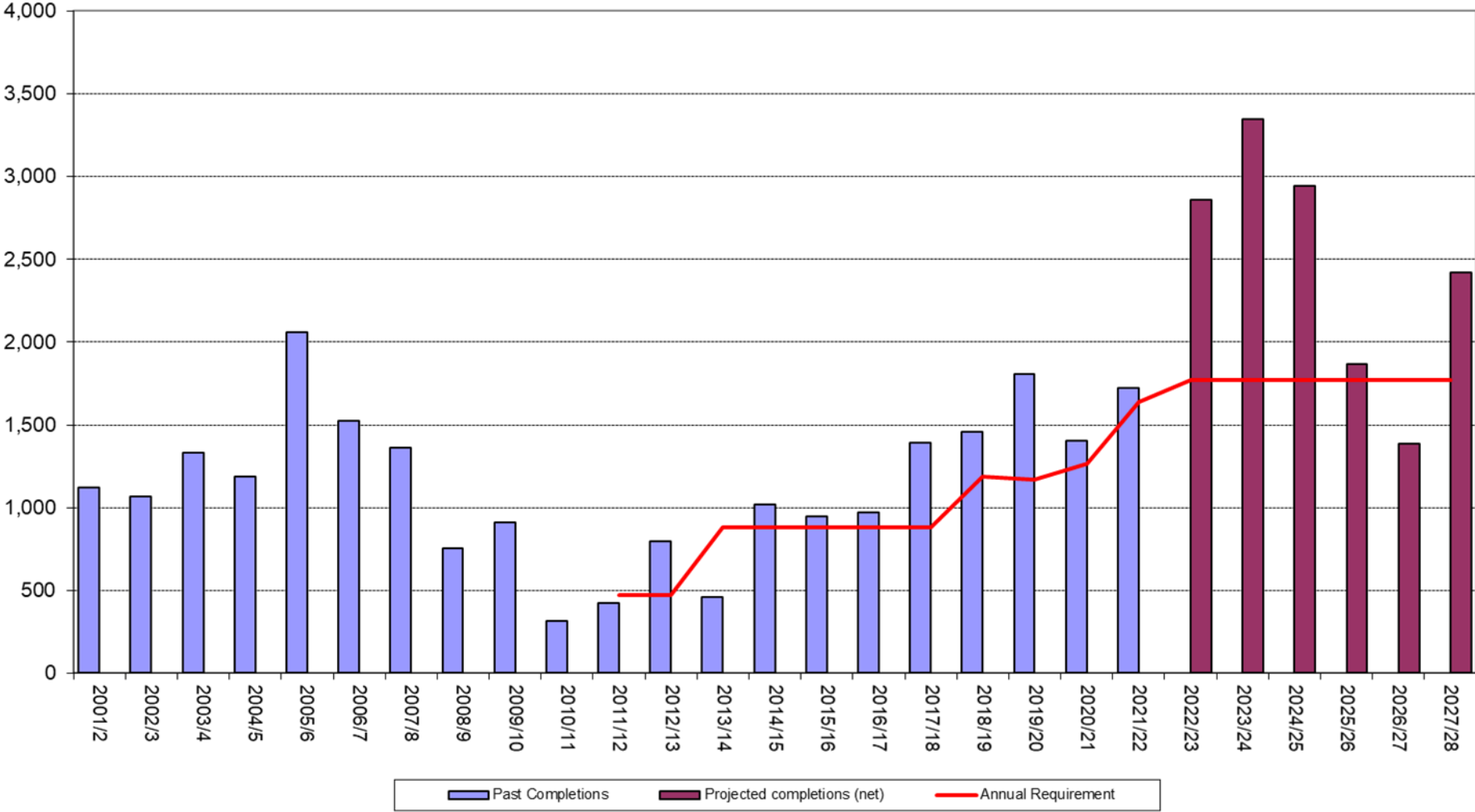
**Figure 2 - Historic Annual Completions in Nottingham City and Standard Methodology**



2.8 It is worth noting that there is no evidence that the Covid-19 pandemic during 2020 and 2021 has impacted on completion levels, which remain buoyant. The City Council’s trajectory (see below) shows that high levels of completions will continue in the short term, and indeed should exceed the 1,773 target. Completions are anticipated to fall off after 2028, due to allocated sites being developed and an anticipated fall in demand for purpose built student accommodation due to demographic factors (see Student Housing section below). **This means that the shortfall in meeting need plus 35% will only become an issue later in the Strategic Plan period.**

Figure 3 – Nottingham City Housing Trajectory 2021

Housing Trajectory - Nottingham City (net completions)





## Housing Supply

- 2.9 Housing supply is not static, but is kept under continual review through SHLAAs. The SHLAA review process, and revisiting some key assumptions, has resulted in an increased supply of housing land in Nottingham, as demonstrated below.
- 2.10 As of the 1<sup>st</sup> April 2020 the City had a supply of 19,278 dwellings for the period between 2020-38. 3,129 dwellings were developed 2020-22 meaning supply dropped to 16,149. However, as part of the latest 2021 and 2022 SHLAA reviews, 70 new sites totalling 2,646 dwellings were identified. Additionally, windfall estimates have been increased by 3,628 from 4,545 to 7,885 (adjusted to take account of 480 anticipated demolitions). The estimated capacity of some existing sites also increased, some significantly, for example the City Council is now promoting an increase in the residential element of the wider Broad Marsh area from 75 homes prior the closure of the Broad Marsh centre to a current estimate of 1,000 homes. Together, these changes represent an increase in total supply for 2022-38 of 9,608, i.e. increasing supply from 16,149 to 25,758.

**Figure 4 Housing Supply in Nottingham City (source: 2022 SHLAA)**

	<b>Supply as at 31/3/21</b>
<b>1. All deliverable sites (i.e. within five years)</b>	12,169
<b>2. Existing LP allocations not in the above category</b>	2,074
<b>3. Other developable sites</b>	2,114
<b>4. Potential GNSP site allocations not included above (i.e. 1,000 Broad Marsh, 500 at Stanton Tip and 230 at Boots)</b>	1,730
<b>5. Windfall allowance</b>	8,335
<b>6. Non-implementation allowance* (as no buffer provided)</b>	- 184
<b>7. Demolitions</b>	- 480
<b>HOUSING SUPPLY TOTAL</b>	<b>25,758</b>

\* A Non-implementation allowance is applied to planning permissions and allocations to account for development which is expected to happen, but does not come forward in the Plan period. It is only required where the local plan target does not include a buffer above the housing need requirement.

- 2.11 The shortfall in provision for Nottingham City for the Strategic Plan period is **2,608 homes**, which is the difference between housing need plus 35% uplift of 28,368 and identified housing supply of 25,760.

### **3 Boosting the Supply of Housing**

3.1 The sections which follow describe the steps Nottingham City has taken to significantly increase its supply of housing as described in section 2. These initiatives continue and include:-

- Regular “calls for sites” issued to developers, agents and landowners
- Active consideration of City Council owned sites for development and/or disposal
- Critical review of existing sites in terms of density, deliverability and developability (via the SHLAA review)
- Critical examination of past windfall levels, and reassessment of trends via the SHLAA
- Working with Universities to understand future impact of growing student numbers
- Allocation of several greenfield sites (and former Green Belt sites) in the Local Plan Part 2 – Land and Planning Policies Document (LAPP), which are currently being developed
- A thorough Green Belt review in preparation for the Strategic Plan
- Recently conducting an Open Space audit
- Assessing employment land sites in the City for appropriateness for release or mixed use development including housing.
- Strongly promoting brownfield development, including developing sites itself through its ALMO, Nottingham City Homes and development partner Blueprint
- Brokering land deals between land owners and established development partnerships, using Compulsory Purchase Orders (or the threat of them) to release land owner blockages.

### **4 Approach to Identifying Supply**

#### **Strategic Housing Land Availability Assessment (SHLAA)**

- 4.1 The Review of Greater Nottingham SHLAAs, Final Report, 2019 was undertaken by ARUP, to review the different methodologies taken to SHLAAs by each Council, to ensure robustness and consistency (as far as this is appropriate). It made a number of recommendations on how this could be achieved, using their best practice experience from similar SHLAA reviews undertaken elsewhere.
- 4.2 Based on the advice contained in the Study, the Greater Nottingham Planning Partnership prepared the Greater Nottingham Joint Methodology Report for SHLAAs, which sets out the joint approach. Where deviation from the joint methodology is justified by the ARUP report, this is set out in appendices specific to each authority.
- 4.3 Using this methodology, the SHLAA is updated on an annual basis and provides valuable intelligence to track progress on existing sites, identify new sites to provide for the City Council’s housing requirement, and make the annual assessment of the five year housing supply.
- 4.4 The annual review process includes directly contacting developers and landowners etc, who are asked to provide updated information on site capacity and delivery or anticipated delivery, and detail any issues that are causing sites to stall. They are also invited to submit new sites for consideration. The previous applicant/developer/agents of lapsed sites are

contacted to ascertain future delivery prospects with the aim of identifying more developable and deliverable sites.

- 4.5 The annual review also involves City Council officers from various sections of the City Council, including Major Projects, Parks & Open Spaces, Property, Housing & Regeneration who review and provide up to date site information on which capacity and delivery assumptions are made and future potential sites are identified. Sites previously classified as 'may be suitable' and non-deliverable/non-developable are reconsidered.
- 4.6 The review allows indicative trajectories to be produced and these are sense checked with officers at the City Council and with developers and landowners. In terms of assessing site capacity, where planning permissions exist, this figure has been used for the number of houses and employment hectareage. The most up to date intelligence from Development Management and Property Services colleagues, based on local site and developer knowledge, has allowed these figures to be verified and revised as appropriate. Where sites do not benefit from planning permission, a judgement on an appropriate 'range' of development has been made. The range is based on officer expertise, an assessment of achievable densities and any comparable planning permissions in the locality, as well as a desire to promote brownfield development and make the best use of land. From this range, an estimate of the development potential uses the mid-point of the range to robustly compare the potential delivery against housing and employment land targets.
- 4.7 Other assumptions contained in the SHLAA are also monitored to refine and validate housing yield; such as site lead in times and build out rates. The City's SHLAA process is closely aligned with those of the partner Councils, and is considered to be robust.

### **Windfall**

- 4.8 In line with the ARUP report, and in recognition of the different nature of housing supply in the City Council area, the City has adopted higher assumptions in relation to windfall allowance than the Boroughs/Districts which has resulted in a significant increase in supply. This is based on workings in the Greater Nottingham Joint Methodology Report for SHLAAs Document – City Appendix (<https://www.gnplan.org.uk/media/3371771/shlaa-joint-methodology-report.pdf>).
- 4.9 Unlike the surrounding Boroughs, the City uses a 5 year average rather than 10 years as the basis for its windfall allowance. This is because data collection before 2015/16 is incomplete as it only related to schemes which received planning permission since that date, rather than also counting completions on sites granted permission prior to this. Taking a 10 year average therefore resulted in an artificially low windfall allowance, so based on past trends a windfall allowance of 616 dwellings per annum from year 4 onwards has been used. The annual SHLAA review will allow the assumptions to be reviewed and revised where necessary.

**Figure 5 – Windfall in Nottingham City**

	A	B	C	D	E	F
Year	Dwellings built on former employment site	Windfall dwellings on former employment site	Dwellings on sites of 5 or more dwellings	Dwellings on sites of less than 5 dwellings	Total Windfall	% of windfall >5 dwellings on previous employment sites
2016/17	791	N/A	238	144	382	N/A
2017/18	464	N/A	469	111	580	N/A
2018/19	428	N/A	650	83	733	N/A
2019/20	965	163 (inc 9 former industry)	392	79	471	41.6%
2020/21	310	280 (inc 10 former industry)	561	87	648	49.9%
2021/22	482	88 (inc 9 former industry)	560	90	650	1%
Average	573 pa	177 over past 3 years	478 over past 6 years	99 over past 6 years	577 pa over 6 years	35.1% over the past 3 years

- 4.10 The windfall allowance of 616 dwellings per annum compares with the 10 year net housing delivery average of 1,199 dwellings per annum and a 20 year delivery average of 1,146. This is 51% and 54% of total delivery respectively and significantly above the rates in partner Councils, due in large part to the different nature of housing supply in Nottingham City.
- 4.11 A significant number of these windfalls are in the City Centre and many are also for student housing (see section 5 below on the contribution of student housing to Nottingham’s City’s housing supply). The reuse of former offices is a key source of supply, and although the introduction of permitted development rights for office conversions did lead to new supply, this has now largely tailed off, as the supply of suitable buildings has reduced. The introduction of other permitted developments has not yielded significant new supply.
- 4.12 The windfall allowance is therefore considered to be justified, and there is currently no evidence that would support a higher windfall figure, although figures are monitored annually, and adjustments can be made should windfall rates change.

## Density assumptions

- 4.13 The City Council also uses relatively high density assumptions when compared with the partner Councils. For City Centre flats and student housing, the densities are very high, usually in excess of 100 per hectare and often significantly more. The LAPP does not have a specific density policy, rather density is considered in the context of all design considerations to achieve an attractive development which takes the local context into account. Policies are not designed to lower density, but to secure appropriate densities in the context of scale, massing and urban grain.
- 4.14 The City currently secures high density development where appropriate, with some 50 sites at over 300 dwellings per hectare identified in the SHLAA. These are typically private flats and purpose built student accommodation. For family housing, average density in the City is over twice the 30 dwellings per hectare national average and are above comparable sites in partner Councils, for instance, Piccadilly (Former Henry Mellish School Playing Field) at 50 dwellings per hectare, Elms School at 59 per hectare, and Eastglade in Top Valley at 43 per hectare, a site which also includes a significant amount of open space. Only where site-specific information is not available are generic assumptions used, these are set out in the SHLAA methodology, and are:
- 30-35 dph for low density (suburban);
  - 40-50 dph for medium (e.g. Victorian terraces);
  - 50+ dph for City Centre (flats and maisonettes).
- 4.15 Nottingham City Council has a particularly low proportion of homes suitable for families when compared to both the Housing Market Area as a whole and the national average. In 2011, only 55.6% of dwellings in Nottingham had 3 or more bedrooms compared with 63.3% in Greater Nottingham and 60.1% nationally. The part 2 Local Plan supports the current Nottingham City Housing Strategy aim of ensuring sufficient homes suitable for families to live in. It contains policies strongly in favour of the provision of family housing, HO1 promoting family housing on appropriate sites, and HO2, protecting existing houses suitable for family occupation from development. These policies seek to address the longstanding issue of families and family aged people migrating from the City to surrounding areas.
- 4.16 Although family homes are perceived to be developed at lower densities, analysis demonstrates that the City Council is achieving this policy aim in the context of higher densities, and between 2011 and 2021 39.2% of the private dwellings completed outside of the City Centre had three or more bedrooms.
- 4.17 Density in the City Centre is subject to the same design considerations as elsewhere, but in addition, the City Centre Urban Design Guide (2009) promotes taller buildings particularly in the east side of the City Centre and around the station hub. It notes that the issue of tall buildings in Nottingham is of particular importance because the city's skyline is revealed along a ridge between the high points of the Castle Rock and the Lace Market Cliff, from where St Mary's contributes so much to the city's character. The City Council uses a 3D model to ensure building heights are appropriate for their location, and recent tall buildings either developed or approved include the former petrol station at the north end of London Road (447 dwellings per hectare) former car park adjacent to the station on Queens Road (483 per hectare), and the former Gala Club in the Eastside (334 per hectare).

- 4.18 The City Centre Urban Design Guide was prepared by URBED, independent design consultants, and many major schemes are also appraised by the City Council's Design Review Panel, which is made up of independent experts. As a result, there is a high degree of confidence that the City Council's approach to high density development is appropriate to its location.

### **Greater Nottingham Growth Options Study, 2020 (AECOM)**

- 4.19 The partner councils jointly commissioned AECOM to undertake a study of potential growth options for Greater Nottingham to inform the Growth Options consultation. Part of the study was a 'call for sites' whereby developers were invited to submit potential strategic development sites for assessment. Only one site was submitted in Nottingham City, a site abutting the new development at Woodhouse Park to the west of Nottingham (site ref BO8.5). The site is in the Green Belt and subject to a number of environmental constraints. It is therefore currently considered to be unsuitable, non-deliverable and non-developable.
- 4.20 Due to its relatively small size (7.9 hectares) and likely housing yield, the site is not of a strategic scale. Accordingly its appropriateness for development and associated policy restrictions will be re-assessed as part of the review of the Nottingham City Part 2 Local Plan.

## **5 Sources of Housing Supply**

- 5.1 This section explores the nature of the City Council's land supply in more detail, describing its contribution to date, and prospects for continuing contribution/delivery going forward.

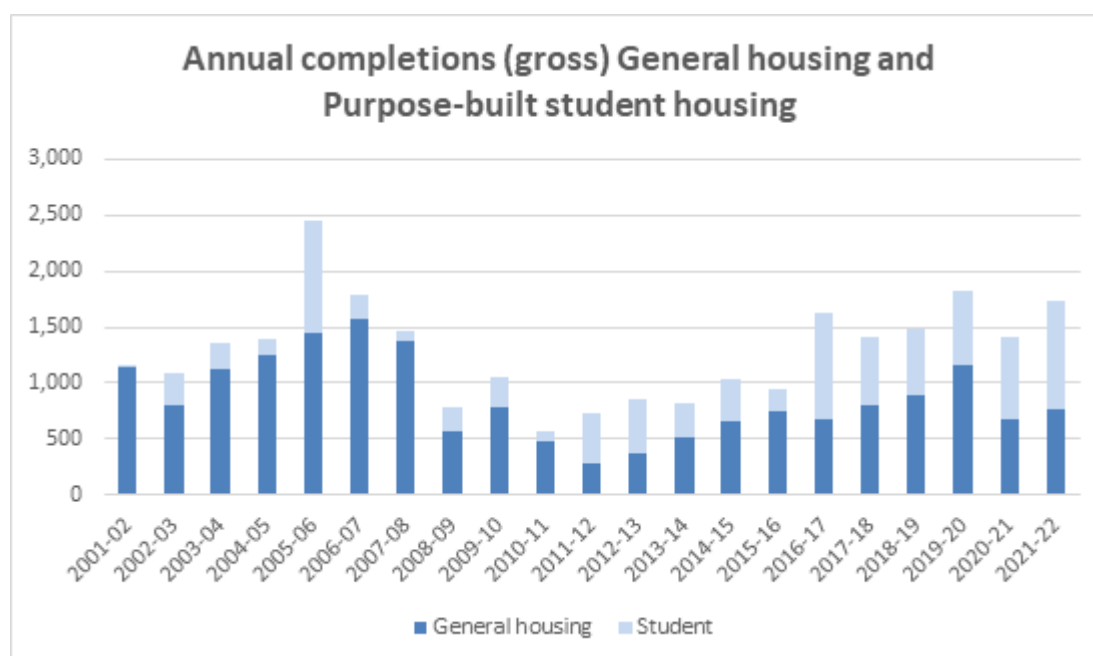
### **Student Housing**

- 5.2 More than one in eight of Nottingham's population is a student and as such Purpose Built Student Accommodation (PBSA) forms a significant part of the City's housing supply. It is a form of accommodation that is strongly encouraged in the City Centre and on University campuses (and other specific locations) through proactive Local Plan policies. The aim of the policy approach is to provide an attractive alternative to student Houses in Multiple Occupation, freeing these up for more general occupation including family accommodation, and housing students in well managed high quality suitably located accommodation. National Planning Practice Guidance explains that student housing can contribute to overall housing provision, on a one for one basis for studio flats, and on a proportion of bed spaces for cluster flats.
- 5.3 The Government has issued guidance on how student accommodation can contribute to housing targets. Using that methodology, between 2016 and 2022 there were 4,504 student dwellings built in Nottingham, representing over 50% of net new dwellings. However, predicting how the PBSA market might develop is driven by three factors; the growth in student numbers generally, the need to meet previous undersupply of PBSA, and the shift from HMO or shared housing to PBSA.
- 5.4 Whilst the Universities are planning for continuing growth, their plans are relatively short term and only look ahead 5 years. Given that the growth in student numbers has not been matched by the delivery of PBSA, there is still strong demand for further provision. This is evidenced by the City Council's annual PBSA vacancy survey, which indicates very low levels of vacancy year on year. In addition, the Council is promoting innovation in the PBSA

market to bring forward new PBSA schemes which will be more attractive to under-represented student groups who choose PBSA such as returners (2<sup>nd</sup>/3<sup>rd</sup> years) and post graduates which should encourage a further switch from HMOs to PBSA.

5.5 There is currently a substantial pipeline of PBSA schemes with or seeking planning permission, and therefore, there is some confidence that for at least the next 5 years, PBSA will continue to contribute significantly to meeting Nottingham’s housing need. (The pipeline is approximately 9,500 bedspaces, estimated to equate to approximately 1,000 PBSA units per year). However, beyond this period, the future is more difficult to assess, as the Universities may not continue to grow at their current levels, and the supply of PBSA is likely to catch up with demand. It is therefore considered prudent to expect a decline in this source of housing around the end of the decade, as the student aged population is projected to decline thereafter.

**Figure 6: Purpose Built Student Accommodation as a proportion of total housing completions**



## Greenfield Development

- 5.6 In order to maximise housing delivery the Council has allocated a significant hectarage of former open spaces (largely former school sites and associated playing fields) for residential development. There are nearly 200 sites in the City considered suitable for housing, set out in the SHLAA. A quarter of these sites, the larger ones, are allocated in the Local Plan Part 2. Of these, 12 are former open spaces and playing pitches, and there is also a former allotment site. The sites total about 90 hectares which will provide for over 1,800 dwellings.

**Figure 7: Greenfield Development Sites**

Site Name	Local Plan Ref	Hectares	Dwellings
Farnborough Road - Former Fairham Comprehensive School	SR51	7.71	196
Clifton West, Hawksley Gardens	SR49	9.59	285
Russell Drive - Radford Bridge Allotments	SR30	3.85	43
Denewood Crescent - Denewood Centre	SR22	3.04	120
Chingford Road Playing Field, Wigman Road	SR21	6.03	150
College Way - Melbury School Playing Field	SR20	1.3	50
Stanton Tip - Hempshill Vale	SR11	42.65	500
Piccadilly - Former Henry Mellish School Playing Field	SR10	1.15	57
Edwards Lane - Former Haywood School Detached Playing Field	SR09	4.38	118
Beckhampton Road - Former Padstow School Detached Playing Field	SR06	5.13	129
Ridgeway - Former Padstow School Detached Playing Field,	SR05	2.56	55
Eastglade, Top Valley - Former Eastglade School Site, Birkdale Way	SR03	2.43	106
<b>TOTALS</b>		<b>89.82</b>	<b>1809</b>

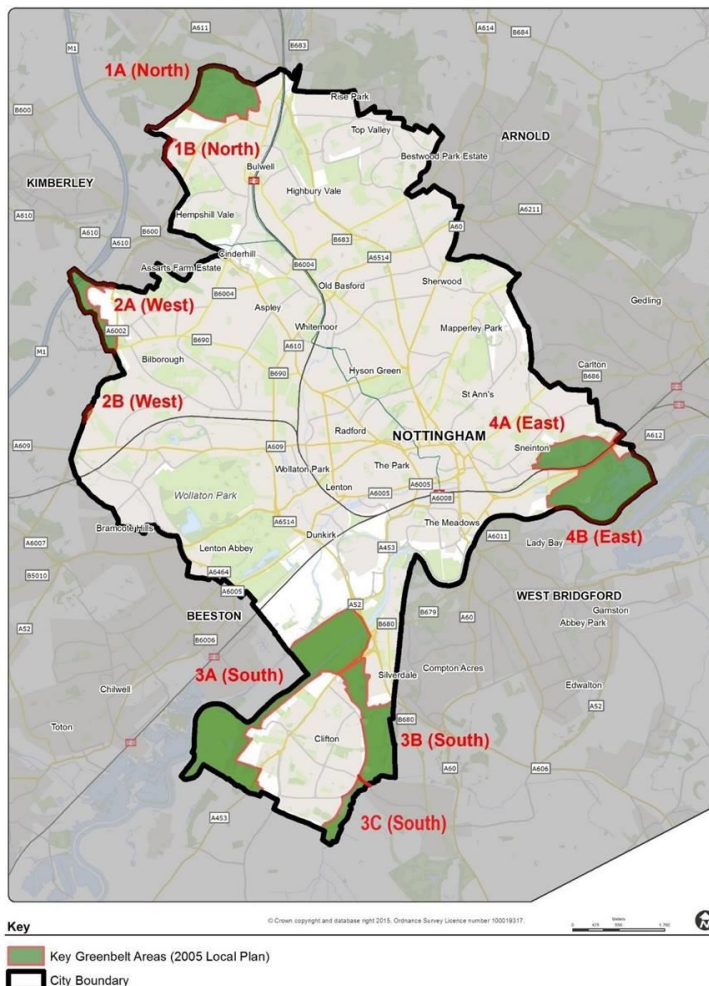
- 5.7 A recent (2021) Open and Green Space Quality Audit for Nottingham City was undertaken by LUC consultants. It assessed the quality and accessibility of the City's open space typologies and recommended quantity and accessibility standards per head of population of various open space typologies, and that these standards be secured through planning policy. Given population projections for the City, Open Space standards per head of population will be less likely to be met over time, and the Audit states that by 2050 Nottingham as a whole will be below the quantity standards for Public Open Space and Provision for Children and Young People. For this reason, it is unlikely that open space will form a significant source of housing land into the future.



## Green Belt

- 5.8 Two of the sites identified in Figure 7 were formerly in the Green Belt. The Green Belt reviews provided the evidence for Farnborough Road to be removed from the Green Belt and allocated for housing in the current Local Plan Part 2, and Clifton West was originally allocated in the previous Local Plan. These sites will provide for almost 500 new homes.
- 5.9 The City along with the surrounding Boroughs has undertaken a Green Belt Review (with a common methodology, and peer review of areas adjacent to Council boundaries). This will be used to inform the site selection process.
- 5.10 10% of the City is Green Belt, much of which is subject to other policy constraints such as being in the floodplain, parkland or ancient woodland. The Green Belt review highlights that Green Belt land continues to play a critical role in preventing coalescence and sprawl.

**Figure 8: Green Belt in Nottingham**



- 5.11 All the Green Belt sites also have multiple designations in the current LAPP as shown in Figure 9 below which would also need to be taken into account as part of any site selection process.

**Figure 9: Green Belt Assessment 2021 and Other Local Plan Designations**

Broad Green Belt Area Reference	Other Designations
<p><b>1A</b> Bulwell Hall Park &amp; Nottingham Golf Club (Assessment NC1)</p>	<p><b>Local Wildlife Sites (EN6) – Bulwell Hall Park – most of the area</b></p> <p><b>Local Nature Reserves (EN6) – Bulwell Hall Park</b></p> <p><b>Open Space Network (EN1) – all of area except a small area of residential streets excluded from the network</b></p> <p><b>Ancient Semi-Natural Woodland (EN7) – Barker’s Wood – part of area</b></p> <p><b>Plantation on Ancient Woodland Sites (EN7) – Barker’s Wood – part of area</b></p> <p><b>Rivers, Canals, Waterways (EN5) – north of area</b></p> <p>Mineral Safeguarding Area – most of area</p> <p>AQMA (IN2) - City-wide</p>
<p><b>1B</b> Land to West of Seller’s Wood Drive West (Assessment NC2)</p>	<p><b>Local Wildlife Site (EN6) – all of area</b></p> <p><b>Local Nature Reserves (EN6) – Seller’s Wood</b></p> <p><b>Open Space Network (EN1) – all of area</b></p> <p><b>Ancient Semi-Natural Woodland (EN7) – Seller’s Wood, covers most of the area</b></p> <p><b>SSSI (EN6) – Seller’s Wood</b></p> <p>Mineral Safeguarding Area – part of area</p> <p>AQMA (City-wide)</p>
<p><b>2A</b> Land around Nottingham Business Park</p>	<p><b>Conservation Area (HE1) – Strelley</b></p> <p><b>Open Space Network (EN1) – all of area except a small area of residential streets excluded from the network</b></p> <p><b>Local Geological Site (EN6) - Stone Pit Plantation Quarry, Strelley</b></p> <p><b>Local Wildlife Site (EN6) – Stone Pit Plantation – 2.4ha. Also a small area of Strelley Hall Park Local Wildlife Site is within the City boundary</b></p> <p><b>Ancient Semi-Natural Woodland (EN7) – Broadoak Plantation</b></p>

	<p><b>Archaeological Constraints Area – Strelley Rd West</b></p> <p>Mineral Safeguarding Area – part of area</p> <p>AQMA (City-wide)</p>
<p><b>2B</b> Land West of Bilborough Road</p>	<p><u>2B (West)</u></p> <p>Not in the Open Space Network</p> <p>AQMA (City-wide)</p>
<p><b>3A</b> Land North-west of Clifton</p>	<p><b>Open Space Network</b></p> <p><b>Conservation Area – Clifton Village – small part of area</b></p> <p><b>Registered Parks and Gardens – Clifton Hall – small part of area</b></p> <p><b>SSSI – Holme Pit</b></p> <p><b>Local Wildlife Site (EN6) – Clifton Wood</b></p> <p><b>Local Nature Reserve (EN6) – Holme Pit Pond</b></p> <p><b>Local Geological Site (EN6) – Holme Pit, Clifton – small area</b></p> <p><b>Rivers, Canals, Waterways – River Trent</b></p> <p><b>Archaeological Constraints Area – Wilford, Clifton Grove/Trentside, Clifton Village, Clifton Fox Covert Lane, and Clifton Barton Lane</b></p> <p>Indicative Proposed Cycle Route improvements</p> <p>PEDL</p> <p>Mineral Safeguarding Area – all of area</p> <p>AQMA (City-wide)</p> <p>Flood zone 2 and 3 – majority of the area</p>
<p><b>3B</b> Land north-east of Clifton (Assessment NC6)</p>	<p><b>Open Space Network</b></p> <p><b>Local Wildlife Sites (EN6) - Fairham Brook (North of Fairham Bridge)</b></p> <p><b>Rivers, Canals, Waterways</b></p> <p><b>Allotments – Merevale Allotments, and Farnborough Rd Allotments</b></p> <p><b>Archaeological Constraints Area - Wilford</b></p> <p>PEDL</p>

	<p>Mineral Safeguarding Area – all of area</p> <p>AQMA (City-wide)</p> <p>Flood zone 2 and 3 – northern part of the area</p>
<p><b>3C</b> Land between Ruddington and south east of Clifton (Assessment NC7)</p>	<p><b>Open Space Network</b></p> <p><b>Local Wildlife Sites (EN6) - Fairham Brook Nature Reserve</b></p> <p><b>Rivers, Canals, Waterways – River Trent</b></p> <p><b>Allotments – Summerwood Lane Allotments</b></p> <p>PEDL</p> <p>Mineral Safeguarding Area – all of area</p> <p>AQMA (City-wide)</p>
<p><b>4A</b> Colwick Woods (Assessment NC8)</p>	<p><b>Open Space Network</b></p> <p><b>Local Nature Reserves (EN6) – Colwick Woods</b></p> <p><b>Local Wildlife Sites (EN6) – Colwick Woods</b></p> <p><b>Local Geological Site (EN6)– Colwick Wood Cliffs</b></p> <p><b>SSSI – Colwick Cutting</b></p> <p>PEDL</p> <p>Mineral Safeguarding Area</p> <p>AQMA (City-wide)</p>
<p><b>4B</b> Colwick Park/ Racecourse</p>	<p><b>Open Space Network</b></p> <p><b>Rivers, Canals, Waterways</b></p> <p><b>Scheduled Monuments - St John Baptist's Church and graveyard, Colwick</b></p> <p>Indicative Proposed Cycle Route improvements</p> <p>PEDL</p> <p>Mineral Safeguarding Area</p> <p>AQMA (City-wide)</p> <p>Flood zone 2 and 3 - majority of area</p>

## Brownfield Sites

- 5.12 In accordance with policies of the Aligned Core Strategy, most housing has been developed on brownfield sites or by conversion of existing buildings -between 2011 and 2022, 95.7% of dwellings were built on brownfield sites. A frequent argument put forward at recent Local Plan examinations is that if more brownfield sites were to be developed, then there would be less need for greenfield development. However, Inspectors have always supported the City Council's arguments that all appropriate brownfield sites are already included in the housing land supply.
- 5.13 Plans showing all the brownfield sites in the City Council's SHLAA are included in Appendix 1 below.
- 5.14 The three most significant brownfield sites in the City are the Waterside area (1,234 homes), the Island Quarter (1,316 homes), and Broad Marsh (1,000 homes currently anticipated). There are also a large number of smaller Brownfield sites included as allocations in the Local Plan, or identified in the SHLAA. It is appropriate that the larger brownfield sites (especially those in the City Centre) include a range of uses to support the economy of the City Centre, provide for sustainable communities, and provide employment opportunities and functions appropriate to a Core City. The map at Appendix 1 shows all brownfield sites of over 50 homes allocated or identified for development.

### Case Study - Sherwood Library

An opportunity was identified to improve a dated and unattractive 1970's street frontage in Sherwood District Centre, owned by the City Council, and comprising retail units with a library above, together with the adjacent public shoppers car park.

There was a strong community desire for a replacement good quality library, to replace the old and outdated one present on the site, and the site was allocated in the 2019 Local Plan. The site was marketed with a brief requiring re-provisioning of the library, new homes and active frontage to Mansfield Road. Following an evaluation of bids, the site was sold to a specialist developer, and granted planning permission in 2021 for library, retail unit and 7 flats above with further development to provide 12 houses, 22 flats and a (smaller) public car park.

Phase 1 is now underway, and includes the 7 apartments above the new Library, and is anticipated to complete in September 2022, Phase 1a – the other 22 flats are anticipated to complete in March 2023, and Phase 2 - the 12 houses, are due to complete in June 2023.

## **Brownfield Register**

- 5.15 The Brownfield Register is a subset of the SHLAA, and therefore does not represent additional supply, but nonetheless it is published annually to promote opportunities to interested parties. See section above for more detail on brownfield sites.

## **Employment Land**

- 5.16 Nottingham provides an employment base for the whole of Greater Nottingham, based on 2019 figures, 194,600 of 310,400 jobs in Greater Nottingham were based in the City, i.e. 63%.
- 5.17 Former employment sites can provide a significant source of new housing land. National and local policies support redevelopment or change of use where existing employment sites are of poor quality, and no longer meet the needs of business. These types of sites usually come forward at short notice, and are therefore included in the windfall figures already. Over the last 6 years, an average of 573 dwellings per annum have been developed on former employment sites. This represents 39% of net completions.
- 5.18 Nottingham City monitors employment sites, and they were assessed for their suitability for development as part of Local Plan preparation. The employment land study which informed the Local Plan concluded that about 35 hectares of industrial and warehousing were needed in the City for 2011-38. As this exceeded the amount of industrial and warehousing land available, the target was reduced to 21 hectares, with the remainder being provided elsewhere in Greater Nottingham. Employment land is therefore in short supply in Nottingham City, and the study recommended the local plan limit losses of good quality employment land or land that served a particular employment need. (It should be noted however, that Nottingham provides 77% of Greater Nottingham's office floorspace requirements to 2038, reflecting its role as a regional office hub).
- 5.19 Most recently, the Nottingham Core HMA and Nottingham Outer HMA Employment Land Need Study (2021) undertaken by Lichfields has similarly identified a need for more employment land than is available in the City, and concludes that in the City the existing approach to policy protection for employment sites should continue.
- 5.20 Permitted Development allowing changes of use to residential, particularly of offices has provided additional supply. The number of dwellings developed on previous office sites peaked in 2016/17 and have tailed off since then, as the most attractive opportunities are taken up. This is shown in the table below.

**Figure 10: Annual number of dwellings provided by Office Development Permitted Development**

Year	Annual number of dwellings provided by Office Development Permitted Development
11/12	0
12/13	0
13/14	0
14/15	29
15/16	131
16/17	582
17/18	190
18/19	101
19/20	51
20/21	32
21/22	160
<b>Total '11 to '21</b>	<b>1,276</b>

- 5.21 Given the already significant proportion of housing supply from former employment sites, the need to retain good quality employment sites, and the depletion of Permitted Development opportunities, it is not considered realistic to expect this source of housing supply to increase in the future.
- 5.22 The Government has introduced further permitted development rights in respect of retail, restaurants, light industry, nurseries and gyms. However, given these uses are likely to involve changes beyond simple change of use, they are therefore likely to require planning permission, and it is considered that the scope for housing delivery is already accounted for in the windfall allowance (paragraph 4.8-4.12).

### **The City Centre**

- 5.23 The City Centre is a continuing strong focus for residential development, including student housing, office conversions, and build to rent schemes. The population of the City Centre was 13,854 in 2011, and had more than doubled to 28,275 by 2020.
- 5.24 In the future, at least in the short term, it is anticipated that the current level of development will continue. The emerging proposals for the wider Broad Marsh site include 1,000 new homes, and the development of the Island Quarter will also provide 1,316 new homes.
- 5.25 There is much speculation about the future of City centres post Covid 19, and certainly there will need to be adaption and change as there is a move towards diversifying the offer away from retail, with more food and beverage and other leisure development likely. It is too soon to say what the scale and nature of this change will be, and how it will impact on land use (residential in particular) in the City Centre, but the current high level of vacancies shows encouraging signs of reducing, and in the medium term new developments such as Broad Marsh will help to restore vitality and viability.

5.26 At present there is little evidence that the recent broadening of permitted development will have a significant impact on housing delivery, and as noted above, the conversion of existing office buildings is unlikely to reach past levels, as many of the more attractive opportunities have now been developed. Despite Covid 19, there is still strong demand for good quality office space, with several schemes in the pipeline. Whilst conversions and changes of use of non office buildings are probable, the scale of development is likely to be much smaller, and as noted above will help to support the level of windfall development at its current levels.

#### Case Study: Island Quarter

Located within the south east of Nottingham City Centre, the Island Quarter is a 17 hectare site that has been a longstanding ambition of the City Council, it being a prominent brownfield site that has remained available but undeveloped for over 20 years. It is one part of wider jigsaw of regeneration initiatives, linking the City Centre to the Waterside area, and complementing the development centred on the area between the railway station and the Broad Marsh area, known as the Southern Gateway.

The Council's vision for the site was for a new urban business and residential community within the City's Creative and Canal Quarters, a safe, attractive, high quality and mixed neighbourhood, with its own identity and character.

The site was bought from Boots by the City Council in 1994, who sold it shortly thereafter to Simons, with the intention of achieving early development. The City also acquired the Railway Lands to the south and east of the site. A masterplan was approved, involving largely offices and some workshops, and the site was remediated using public funding.

Apart from some piecemeal development to the west of the site, (NHS walk in centre, BBC offices etc) no substantive development took place. In 2003 the Simons' interest was acquired by developers Eastside and City, who started assembling the remaining land.

An application for a mixed use project, comprising 131,000 sqm of offices, 123,000 sqm of apartments, and 16,000 sqm of retail and leisure was granted in 2008. Apart from an early proposal for a large supermarket, there was very little activity on the site, and the City Council bid for the land unsuccessfully in 2014. This long period of inaction on the site has undermined the regeneration of the southern part of the City Centre, and has been a source of significant frustration to the City Council. This led to approval to consider the potential use of Compulsory Purchase powers to acquire the site, to facilitate accelerated development. However, the sale of the site to a new owner ultimately resulted in planning permission being granted in 2020 for 17,300sq.m of Creative Market uses; 58,885 sqm of offices; 14,413 sqm of non-residential institution; 91,888sq.m of residential; 4,153 sqm of local retail; 8,118 sqm of hotel (Class C1) and 27,030 sqm of student accommodation. The first phase is now under development, with a second phase subject to a planning application.



## **6 Proactive Action to Boost Housing Supply**

- 6.1 Housing delivery is very much a corporate priority for Nottingham City Council, and is a key theme of the Nottingham City Housing Strategy. Though Nottingham has had many successes in delivering new housing against challenging targets, it remains challenging due to a constrained land supply and lack of larger (100+ unit) sites, poor land values and the brownfield/post industry nature of potential sites that require remediation often being outside the remit of funding and assistance.
- 6.2 It is therefore necessary for the City Council to take proactive action to deliver or bring delivery to sites where the market has failed to do so, and there are many examples of where it adopts and is adopting an ambitious and creative approach. In support of this aim, a Housing Delivery Action Plan has been completed, despite there being no requirement to do so in terms of its housing Delivery test results. The Plan sets out the proactive action taken by the Council in delivering housing on both its own sites and on those owned by others.
- 6.3 The City Council has two partner organisations who directly undertake housing delivery in the City on the council's behalf; its Arm's Length Management Organisation, Nottingham City Homes (NCH), and its part ownership of Blueprint, a multi-award winning developer specialising in the development of sustainable homes on sites that are often unattractive to mainstream developers, such as Trent Basin in the Waterside which has been successfully delivered with a high 'specification, aspirational homes. Blueprints market leading activities at Waterside have had a catalytic effect in the regeneration zone, with a range of private sector developers now investing in the area following Blueprint's success.
- 6.4 The City Council encourages new products to the market and the private rented sector continues to grow at pace, with purpose built student accommodation and built to rent gaining traction. The City Council and its partners have particular experience in delivering new homes on highly constrained sites, with significant abnormal costs. These are often sites which would not be viable for commercial developers or where the council needs to prepare the sites in order to de-risk and make them more attractive to the market.
- 6.5 In partnership with NCH, the Council has delivered or is on site with over 90 new homes on smaller more challenging sites, for example at former garage sites at Knights Close, Tunstall Drive and Kieron Close. The same partnership, with NCH as managing agent, is also bringing forward the smallest of the former/school and playing field sites at Eastglade for a further 106 new homes. Development of the Beckhampton site for a further 129 Council homes is now in contract, pre-start.
- 6.6 For sites not owned by the City Council, partnerships are established with landowners and developers in the interest of bringing land forward for development. However, consideration will be given to using Compulsory Purchase powers in line with policy RE1 of the Local Plan Part 2, where negotiations are not successful, as it resolved to do at the Island Site (see case study above), and working with agencies such as Homes England to assist in brokering a way forward.
- 6.7 An internal project team – The Private Partnership Housing Delivery Group - has been assembled to examine ways to accelerate housing delivery and raise awareness of potential development sites - both with land owners and developers – and to tackle blockages. The Council has also set up a programme of disposal of Council owned sites

whereby sites are parcelled together to sell to one developer. This group feeds into the council's overall Building a Better Nottingham group and vision.

- 6.8 The Council has disposed of a number of vacant former playing field sites for housing development including Denewood and Chingford. Others such as the Haywood detached site and the Fairham site are in preparation for disposal. The Council worked to de-risk these sites prior to sale, creating access and carrying out a suite of investigations to maximise developer confidence. The Padstow and Ridgeway sites were packaged together and used as part of a procurement exercise to secure a quality 350+ housing development across these sites involving 30% new Council Housing.
- 6.9 A Development Protocol has been adopted to ensure efficiency in the planning application process. This includes developers, infrastructure providers and government agencies such as the Environment Agency and Highways England, and other statutory consultees. All parties are encouraged to sign up to the principles of this advisory document to demonstrate their commitment to the sustainable development and growth of the area.
- 6.10 Under the existing Housing Delivery Action Plan, unimplemented planning permissions are monitored to investigate underlying causes of sites stalling and necessary actions are identified and undertaken to progress these sites. In this respect, the Council works with developers to challenge unrealistic expectations regarding land values and scheme compositions.
- 6.11 The City Council also helps to reduce the risk of site ownership fragmentation by establishing development partnerships to facilitate joint working and cooperation between different land owners/developers and coordination with relevant service providers. The City Council is proactive in promoting collaboration agreements and brokering cross working between land owners, as demonstrated by the approach taken at the Trent Basin resulting in the waterside development, Clifton West with plans for a large mixed tenure residential development, and the Chronos Richardson Local Plan site, which is being taken forward as a mixed commercial and residential development.
- 6.12 The City Council continues to engage regularly with key stakeholders to obtain up-to-date information on the build out of current sites, identify any barriers, and discuss how these can be addressed. This is via direct contact with developers and agents, and also SHLAA annual monitoring/mail outs. On large sites opportunities are taken to work with developers to see if there are any options to partner with other house builders to secure and accelerate housing delivery.
- 6.13 The Council has also worked hard to maximise the contribution of smaller sites to its overall housing delivery vision. It has been successful in a pilot of gaining outline planning permission on small, former garage sites (3-5 homes) before taking them to market. These sites have sold, at or above estimate, to small local firms, who intend to build them out and then re-sell individual properties or as a whole. As a result the Council and NCH are continuing to build a pipeline of smaller sites for the above sale route, and have also secured funding via the LGA for expert advice on the potential of these and other small/challenging sites, for residential development including by Registered Providers and for specialist housing.
- 6.14 Balanced with general neighbourhood traffic management issues that a lack of parking can cause, a flexible approach to car parking provision in developments is promoted which optimises the number of homes that can be delivered on sites. This is having a marked

impact on some of the more constrained or landlocked sites, particularly where viability is marginal. The Council is also encouraging facilities for electric vehicles and bicycles, such as charge points and storage, to enable fit with its “Carbon Neutral 28” agenda and encourage uptake of sustainable transport options.

- 6.15 Masterplans and Development Briefs are prepared for key sites and recent examples include the preparation of SPDs for the Island Site and for the Waterside area, both of which are complex brownfield sites which have now commenced development. An SPD is also to be prepared to guide the development of the Broad Marsh site.
- 6.16 Where infrastructure delivery is holding up supply, the City Council identifies funding opportunities, bids for monies, and/or evolves new local infrastructure funding mechanisms. The Council explores how new delivery vehicles can help drive delivery, for example housing development companies, joint ventures and statutory vehicles such as development corporations. The development of Waterside has been complimented by securing a new primary school, link road and footbridge over the Trent. City Council driven partnerships have also had a significant impact in the Meadows area, with Blueprint’s developments at Green Street and around providing confidence to allow private sector developments to follow, for instance along Arkwright Street. Blueprint’s pipeline developments also include the Former Elms School and Bath Street in the City centre.
- 6.17 Nottingham City Council continues to work closely and build a strong relationship with Homes England, utilising their expertise, influence and networks to find development solutions or request funding that can overcome barriers such as decontamination and flood risk.

## **7 Balancing the Maximum Development with Other Factors**

- 7.1 Of course, housing is not the only priority for Nottingham City, and many factors need to be taken into account when balancing maximum development of housing whilst maintaining quality of life, employment and leisure opportunities.
- 7.2 As noted above, Nottingham is the smallest geographically (7,461 hectares) of the Core Cities and has a density of 45.2 residents per hectare in 2020. Currently Nottingham City has the 7th highest population and the 2nd highest density of the eight English Core Cities. Given the tight geographical boundaries, there is a need to ensure that the full range of opportunities are provided for all development types.
- 7.3 The City is currently ranked 11th most disadvantaged out of 317 areas and there is therefore a significant risk that prioritising housing over all other land uses will result in an unsustainable City, town cramming, loss of viable job opportunities and all the associated environmental, social and health issues.
- 7.4 These balancing factors include the need to provide employment opportunities for the City and Greater Nottingham, in the context of a constrained employment land supply, the danger of creating unsustainable/unbalanced communities, including pressure on infrastructure such as health facilities, unacceptable living conditions and poor residential amenity.
- 7.5 Even if theoretically possible, meeting the full standard method housing need plus 35% uplift would also increase the pressure to release open space and remaining open space would fall below recommended standards, and thus be unable to satisfy leisure needs.

This would likely also result in a loss of biodiversity and inadequate Blue and Green Infrastructure, involve building on land at high risk of flooding, and harm the City's built heritage.

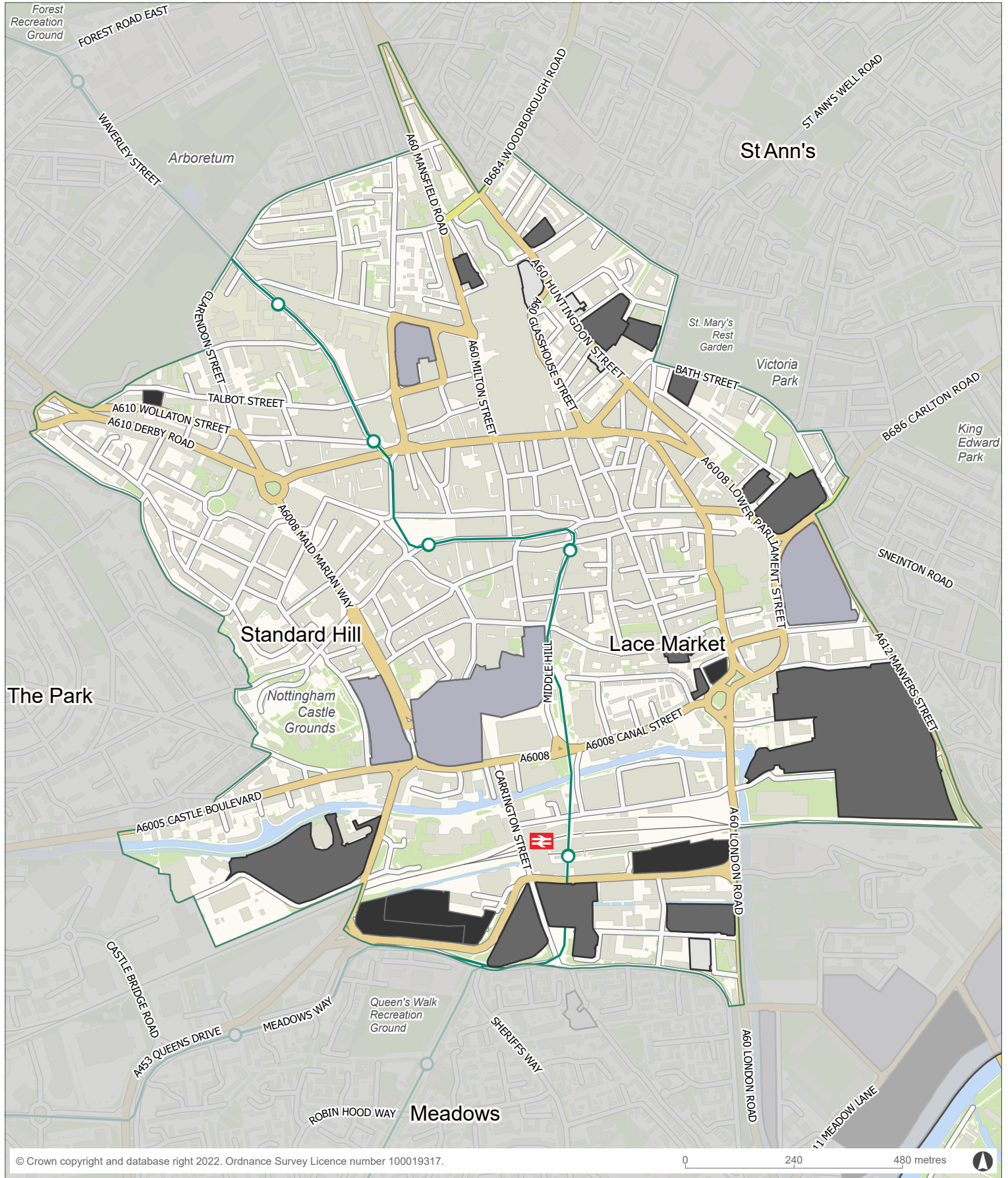
- 7.6 It could also prejudice the provision of new services and facilities, such as the Nottingham College Hub in the City centre, harm night time economies through proximity of incompatible uses, and potentially harm the historic environment of the City centre.
- 7.7 The City Council's approach to housing supply seeks to maximise the delivery of new housing whilst taking these factors into account. It is considered to be an approach that provides the most housing possible, but does mean that some of the 35% uplift cannot be met within the City Council's area.
- 7.8 This unmet need amounts to approximately 2,608 homes in the context of 25,760 anticipated new homes over the Strategic Plan period. To meet the housing needs of Greater Nottingham as a whole would therefore require land to be allocated for these homes outside of the City Council's area.

**APPENDIX 1**

**BROWNFIELD SITES OF OVER 50 DWELLINGS INCLUDED IN NOTTINGHAM CITY SHLAA**

Map 1	City Centre
Map 2	Nottingham Central
Map 3	Nottingham South
Map 4	Nottingham North

# Map Showing Brownfield Sites - Nottingham City Centre | Nottingham City Council

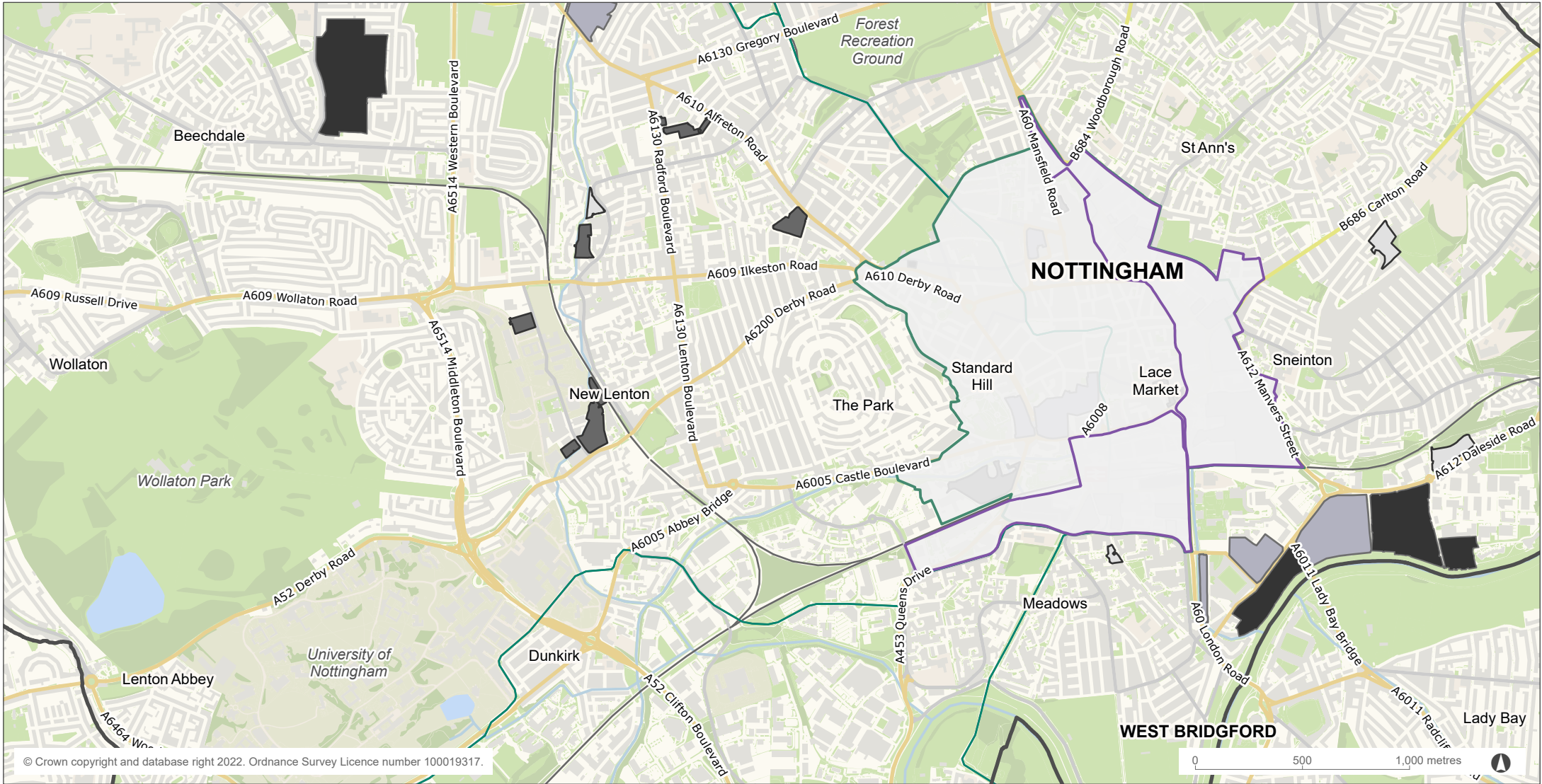


© Crown copyright and database right 2022. Ordnance Survey Licence number 100019317.

0 240 480 metres

- Brownfield Sites > 49 Dwellings Allocated or Identified for Development**
- Simplified Reporting Status**
- Not permitted
  - Local Plan Allocation
  - Permissioned
  - Under Construction
- City Centre
  - City Boundary

# Map Showing Brownfield Sites - Nottingham Central | Nottingham City Council



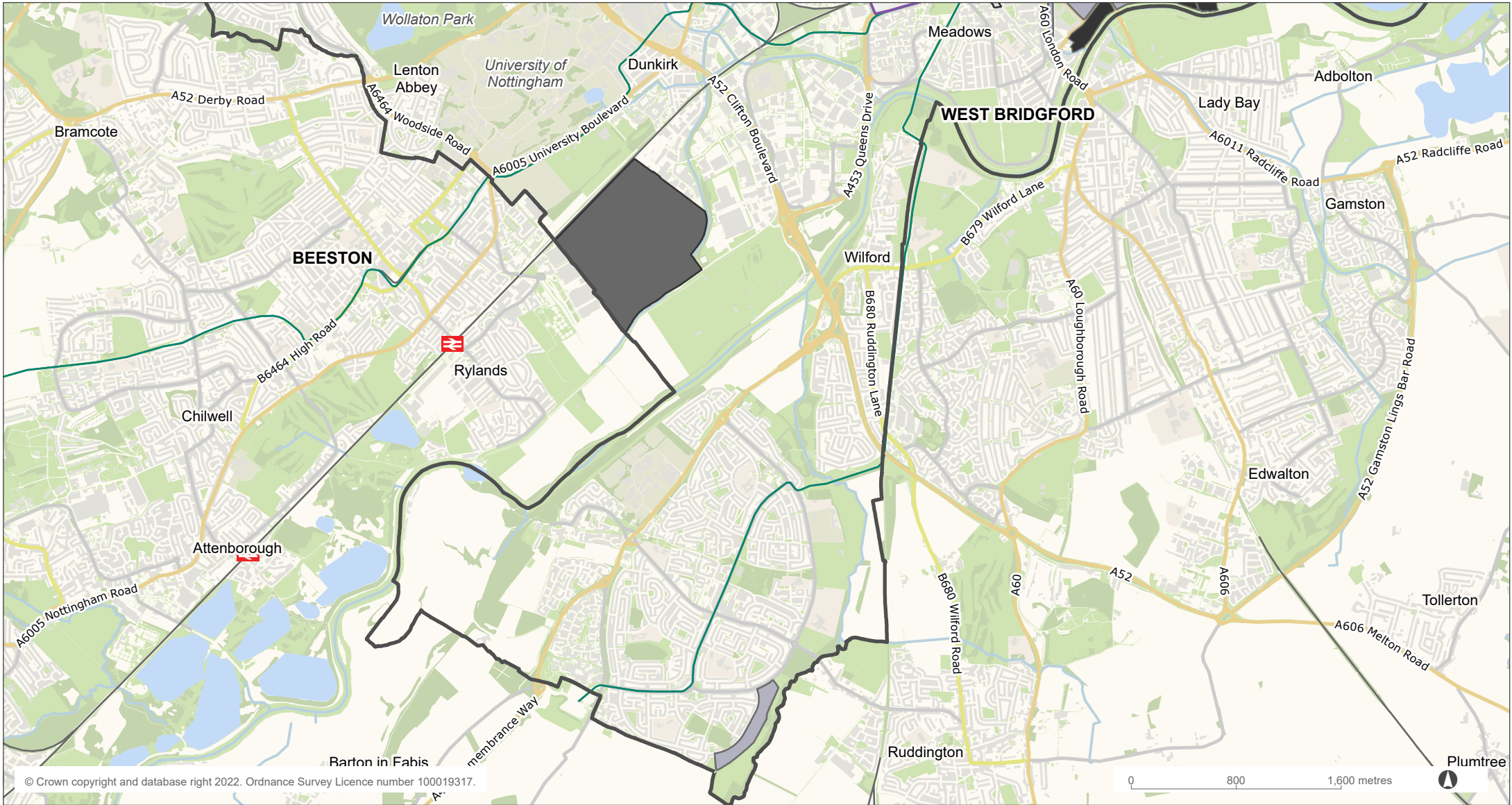
Brownfield Sites > 49 Dwellings Allocated or Identified for Development

Simplified Reporting Status

- Not permitted
- Local Plan Allocation
- Permitted
- Under Construction

- City Centre
- Regeneration Zones
- City Boundary

# Map Showing Brownfield Sites - Nottingham South | Nottingham City Council



Brownfield Sites > 49 Dwellings Allocated or Identified for Development

Simplified Reporting Status

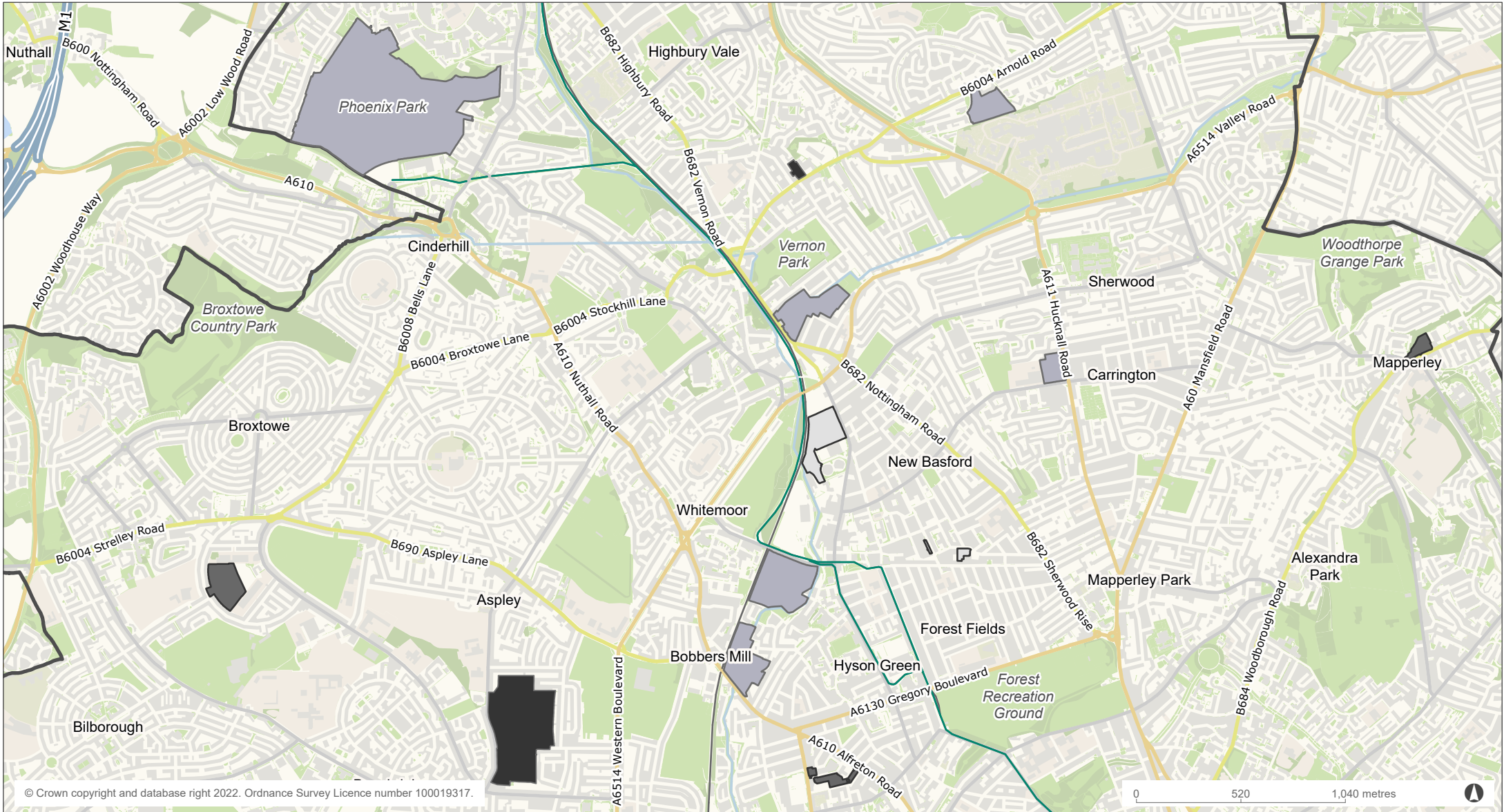
- Not permitted
- Local Plan Allocation
- Permissioned
- Under Construction

City Boundary

Regeneration Zones



# Map Showing Brownfield Sites - Nottingham North | Nottingham City Council



Brownfield Sites > 49 Dwellings Allocated or Identified for Development

Simplified Reporting Status

- Not permitted
- Local Plan Allocation
- Permitted
- Under Construction

City Boundary

