

Greater Nottingham Strategic Plan



Publication Draft: Housing Background Paper September 2024

Greater Nottingham
Planning Partnership



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Important Terms Definitions

Housing Market Area (HMA) – Geographical area defined by household demand and preferences for housing. It reflects the key functional linkages between places where people live and work. The Nottingham Core Housing Market Area consists of Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe. (Hucknall is part of Greater Nottingham but is in Ashfield, which is within the Nottingham Outer Housing Market Area.)

Housing Need – the level of housing need as measured by the Government's "standard method". For Nottingham City, this also includes a 35% uplift to the base calculation, due to Nottingham City being one of the 20 largest urban areas in England. The Government published a draft new standard methodology in July 2024. This uses an area's housing stock as its base rather than the 2014 household projections. It continues to apply an affordability uplift but removes the 35% uplift for the 20 largest urban areas in England.

Housing Supply – the amount of housing the Councils consider can be accommodated in their areas by the end date of the Plan, i.e. 2041. This is calculated using the Councils' Strategic Housing Land Availability Assessments.

Housing Target – the amount of housing each Council proposes to deliver in the Greater Nottingham Strategic Plan by 2041. For Broxtowe Borough, Gedling Borough and Rushcliffe Borough, their targets are set at a level that ensures their annual average is within 200 dwellings of the Government's proposed new standard method annual housing need figure. For Nottingham City, the housing target is the same as its housing supply as identified in the City's current 2023 SHLAA.

Strategic Housing Land Availability Assessment (SHLAA) – an assessment updated annually by each Council to determine the housing supply in their area.

1. Introduction

- 1.1 This Background Paper provides the context for the housing targets and distribution in the Greater Nottingham Strategic Plan, together with the context and reasoning behind the housing mix and Gypsy and Travelling Showpeople policies. It summarises the broad approach to the size, type and tenure of housing needed for the Plan area, drawing on evidence and signposting to where further information can be found.

2. National Policy Background

- 2.1 The National Planning Policy Framework (NPPF) 2023 sets out the Government's approach to significantly boosting the supply of homes. It confirms that the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area, unless exceptional circumstances justify an alternative approach.
- 2.2 The Government published a draft replacement NPPF in August 2024. This reverses many of the changes made in the 2023 version of the NPPF. In particular, it removes the part relating to the standard method being the advisory starting-point for establishing a housing requirement and confirms that the overall aim should be to meet an area's identified housing need.
- 2.3 In parallel, the Government has published a proposed revision to the standard method of calculating an area's housing need. This bases the figure on an area's existing housing stock rather than the 2014 household projections as is used currently. It includes an affordability adjustment but deletes the 35% uplift requirement for the 20 largest urban areas in England.
- 2.4 Paragraph 226 of the draft NPPF sets out transitional arrangements for plans that are to be published before, or within one month, of the publication of the new NPPF, expected at the end of 2024. Where the emerging annual housing requirement is 200 dwellings or fewer below the published relevant Local Housing Need figure (this being the figure derived from the new methodology), the plan can be examined under the current 2023 NPPF.
- 2.5 In Greater Nottingham, the standard method is the starting point for determining housing need, though it is considered adjustments to the need are justified in determining the housing target for the Greater Nottingham Strategic Plan. The intention is to proceed under the transitional arrangements, with the Plan being examined under the current 2023 version of the NPPF. The approach to housing targets is set out in section 4 below.
- 2.6 In addition to determining a housing target, the NPPF requires the size, type and tenure of housing needed for different groups in the community

to be assessed and reflected in planning policies. To this end, the Greater Nottingham Councils jointly commissioned:

- “Greater Nottingham and Ashfield Housing Needs Assessment” (HNA), 2020 (<https://www.gnplan.org.uk/media/3371769/housing-needs-assessment-2020.pdf>);
- its subsequent update the “Greater Nottingham and Ashfield Housing Needs Update”, (HNU), 2024 (<https://www.gnplan.org.uk/media/5xqcj1bw/iceni-greater-nottingham-and-ashfield-housing-needs-update-2024.pdf>); and
- the “Greater Nottingham and Ashfield District Council Gypsy and Traveller Accommodation Assessment” (GTAA), 2021 (<https://www.gnplan.org.uk/media/3372879/greater-nottingham-ashfield-gtaa-report.pdf>).

- 2.7 The HNA and its update consider the size, type and tenure of housing required, addressing the needs of groups as set out in the NPPF (i.e. including, but not limited to, those who require affordable housing, families with children, older people (including those who require retirement housing, housing-with-care and care homes), students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes). However, the HNA does not address Gypsies and Travellers, whose accommodation needs, together with those of boat dwellers, are considered in the GTAA. The HNA also does not address people wishing to commission or build their own homes, who are considered via the Councils’ Self and Custom Build Registers. The approach to planning for affordable housing, housing mix and the accommodation needs of Gypsies and Travellers is set out in sections 6, 7 and 8 below.

3. Outline of Strategy

- 3.1 The spatial strategy defines the settlement hierarchy to accommodate housing growth in Greater Nottingham. This is firstly to accommodate growth in and adjacent to the main built up area of Nottingham; secondly adjacent to the Sub Regional Centre of Hucknall; and thirdly in or adjacent to Key Settlements (see Strategic Plan glossary for definitions). In other settlements (including villages) development will be smaller scale, which will be defined through future plan preparation.
- 3.2 The aim of the spatial strategy is to achieve sustainable development in the Plan area. This will be through adopting the following principles:
- Ensuring development maximises opportunities to enhance the blue-green infrastructure network and incorporates blue and green infrastructure into new development;

- Promoting urban living through seeking sites for development firstly within the main built up area of Nottingham, and to a lesser extent adjoining it;
 - Ensuring that new development adjoining the built up area of Hucknall, or in or adjoining key settlements, is of a scale that supports these as sustainable locations for growth;
 - Creating sustainable and attractive places with an enhanced quality of life for residents through promoting compact and connected places, with convenient access to day to day needs by active and sustainable travel modes; and
 - Maximising the economic development potential of key sites including the former Ratcliffe on Soar power station (in Rushcliffe), Toton Strategic Location for Growth, the Former Bennerley Coal Disposal Point (both in Broxtowe) and the Broad Marsh area (in Nottingham City).
- 3.3 The spatial strategy will ensure that key aims are met; promoting brownfield development, making the best use of land, minimising Green Belt development, and ensuring that new development can benefit from and enhance existing infrastructure wherever possible.
- 3.4 Outside of the Nottingham main built up area, development of a lesser scale will be promoted on the edge of Hucknall (Top Wighay Farm site in Gedling Borough) and at the named key settlements. The scale of development at each location will be in accordance with supporting the sustainability of these settlements and enhancing their infrastructure where necessary.
- 3.5 Outside of the named key settlements, development will be smaller scale, which will be identified through future plan preparation.
- 3.6 It should be noted that most of the planned housing growth is already included or identified in existing Local Plans, and new strategic site allocations for housing are only proposed in Gedling Borough (extension to existing allocation at Top Wighay Farm) and in Nottingham City (at the Broad Marsh area).

Nottingham City

- 3.7 Nottingham City will be a key location for new housing, due to it being a highly sustainable location, with leisure, education and employment opportunities in close proximity to one another and accessible to new housing. It is also important that as much housing as is practicable is developed here, whilst adhering to good development principles which enhance the quality of residents' lives. This will ensure the efficient use of brownfield land, so that greenfield or Green Belt development can be minimised. However, urban living cannot mean 'town cramming'. Maintaining a high quality of life is vital to the success of the strategy, by

ensuring Nottingham City continues to be an attractive place to live, and therefore a viable place for developers to invest in.

- 3.8 The Aligned Core Strategies included strategic locations for housing growth at the Waterside, Southside and Eastside Regeneration Zones. Where appropriate, sites within these locations are allocated in the Part 2 Local Plan and have already delivered significant numbers of new homes. These strategic locations are therefore not carried forward in the Strategic Plan. However the strategic location at Stanton Tip, which is allocated in the Part 2 Local Plan for up to 500 homes, does not yet have planning permission so is carried forward as a strategic allocation. A new site at Broad Marsh based around the former shopping centre is also included as a location for around 1,000 homes.

Broxtowe

- 3.9 In Broxtowe, substantial growth is planned in parts of the south of the borough, supported by the East Midlands Development Company (which will become a Development Corporation once legislation allows).
- 3.10 Land is allocated for housing development at Chetwynd Barracks and for mixed use development at Toton in policies 3.1 and 3.2 of the Broxtowe Part 2 Local Plan. These policies refer to the possibility of potential for further housing development at both locations, subject to decisions to be made as part of the review of the Aligned Core Strategies. However, both allocations were made on the understanding that there would be an HS2 station at Toton. Nevertheless, the Council considers that significant amounts of mixed use development can be successfully achieved in these areas.
- 3.11 Four settlements (Awsorth, Brinsley, Eastwood and Kimberley) were identified as 'Key Settlements' in the Aligned Core Strategies. Three of these, Awsorth, Eastwood and Kimberley, are carried forward into this Plan. However, growth in these settlements will be achieved only through existing commitments, comprising a combination of sites which have already been allocated by the Broxtowe Part 2 Local Plan, and sites within the settlements which already have planning permission, and through those which come forward as infill or redevelopment sites. It is not proposed that any further land adjacent to any of the Key Settlements be allocated for housing development during the Plan period and there will be no Green Belt release for housing development adjacent to these settlements.

Gedling

- 3.12 Gedling Borough has a shortfall in housing supply to meet identified need and the evidence studies have confirmed that strategic opportunities are limited. Nearly all land outside the built-up areas is designated as Green Belt, which would be an important factor in decisions about development elsewhere in the Borough. Additional land to the north and east of the

Top Wighay Farm strategic allocation is identified for development as it meets the sequential approach for locating development in the second highest level of the settlement hierarchy – adjoining the Sub Regional Centre of Hucknall. The site comprises existing safeguarded land and development in this location would not therefore require an amendment to the Green Belt boundary.

- 3.13 The strategic allocation is to be rolled forward through the plan making process and additional land to the north and east identified as a new strategic allocation extending the existing strategic allocation which is anticipated to commence housing delivery in 2024. The entire site (strategic allocation and extension) would deliver housing within the Plan period.
- 3.14 The importance of understanding opportunities and constraints is key, with the Nottinghamshire Green Belt covering the majority of the non-built up area of Gedling Borough. Outside the urban area, careful consideration will be given in particular to non-Green Belt locations which will include specifically the Safeguarded Land identified in the Gedling Local Planning Document Part 2 Local Plan and Policy 4 of the Strategic Plan.
- 3.15 The spatial strategy provides the scope to consider the expansion of Key Settlements, including Bestwood Village, Calverton and Ravenshead. Strategic opportunities for growth are limited and therefore a reliance on non-strategic sites as allocations through future plan preparation will also be required.

Rushcliffe

- 3.16 In Rushcliffe, significant development opportunities remain on many of the sites allocated for housing or mixed-use by the existing Rushcliffe Local Plan. The level of outstanding housing land supply on a range of committed sites across Rushcliffe means that further housing land allocations are not required during the Plan period.
- 3.17 The delivery of sustainable development will be concentrated within the main urban area (West Bridgford) where opportunities exist. However, West Bridgford has relatively limited capacity to accommodate development over the Plan period, and therefore the majority of 'main urban area' development within Rushcliffe will be delivered on the three existing Sustainable Urban Extensions at Melton Road, Edwalton, South of Clifton (also known as Fairham Pastures) and East of Gamston/North of Tollerton.
- 3.18 While a substantial part of the Melton Road, Edwalton strategic allocation has already been completed, it is still to deliver in excess of 500 new homes. The development of the South of Clifton strategic allocation has commenced, and it is expected to be completed within the Plan period. While the strategic allocation to the East of Gamston/North of Tollerton is

still to secure any residential planning permissions, the Borough Council is preparing a site-wide masterplan and development framework in order to enable residential development to start within the next three to four years. Of the 4,000 new homes expected on the site, it is anticipated around 2,700 will be delivered by 2041 and the rest beyond the Plan period.

- 3.19 Beyond the main urban area of Nottingham, there are three other existing strategic allocations within Rushcliffe: north of Bingham; the former RAF Newton; and the former Cotgrave Colliery. The development on each is well progressed, with housing delivery on the former Cotgrave Colliery site completed and the other two due to deliver all new homes early in the new Plan period.
- 3.20 Development elsewhere in Rushcliffe will be concentrated at the Key Settlements of Bingham, Cotgrave, East Leake, Keyworth, Radcliffe on Trent and Ruddington, again to assist in meeting sustainability objectives. The delivery of new homes at these Key Settlements over the Plan period will be achieved through a combination of sites which have already been allocated by the Rushcliffe Local Plan Part 2 (adopted 2019) and sites within the settlements which already have planning permission or come forward as infill or windfall sites. It is not proposed that any further land adjacent to any of the Key Settlements is allocated for housing development during the Plan period.
- 3.21 In other settlements, development will be smaller scale, as defined by a new Rushcliffe Local Plan to replace the one adopted in 2019. It is expected that the delivery of new homes at these other settlements over the Plan period will be achieved through a combination of sites which have already been allocated by the adopted Local Plan Part 2, sites within settlements that already have planning permission or come forward as infill development, conversion or changes of use of buildings and/or on 'exception' sites. It is not proposed that any further land adjacent to any other settlements is allocated for housing development as part of this Plan.

Housing Provision and Employment

- 3.22 The Employment Background Paper sets out in detail comparisons between labour demand (the actual likely demand for jobs) with labour supply (the likely number of people in full time equivalents making up the labour force derived from the housing provision). This is based on the work set out Employment Land Study 2021 (ELS). This study estimated the labour supply using the standard methodology published on 16th December 2020 which included the affordability uplift and urban centres uplift of 35% for Nottingham City. The Publication Draft housing target is 54,670 for the period 2023 - 2041, an annual target of 3,037 and essentially very similar to that used in the ELS to calculate labour supply, being based on an annual requirement of 2,981 homes per annum, a difference of just 56 or under 2%. Given the nature of employment

forecasting such a small difference is not viewed as significant given the likely margins of error in such forecasts. The Employment Background Paper concludes that the anticipated job growth in the Plan area, which is based on a range of job forecasts, is compatible with the planned levels of housing delivery.

4. Housing Target for Greater Nottingham

- 4.1 The Greater Nottingham Strategic Plan Growth Options (2020) asked the question about what factors might justify planning for more or fewer new homes than the Government's standard method. A range of options for the level of housing growth were tested through the Greater Nottingham Strategic Plan Sustainability Appraisal (2024). The proposed housing target included in the Strategic Plan is considered to be appropriate: it provides for the housing need identified through the Government's current 2023 standard method (not including the full 35% unevidenced and unjustified uplift applied to Nottingham City (see paragraphs 4.15-4.16 below)); the proposed housing growth is compatible with jobs growth anticipated through the Greater Nottingham Employment Land Study (2021); and the need to balance the impact of increasing the housing target on the Green Belt.
- 4.2 Sections below describe the Plan's housing target, and how it compares with housing need as calculated using the current 2023 standard method, and the 2024 proposed new standard method.

Greater Nottingham Housing Target

- 4.3 The proposed housing target for Greater Nottingham is a minimum of 54,670 for the period 2023 to 2041. This is an ambitious approach that meets the area's growth aspirations and will also significantly boost the supply of homes.
- 4.4 The draft NPPF further emphasises the importance of the standard method for assessing local need, and includes transitional arrangements for plans at an advanced stage of preparation. Under these transitional arrangements, the Strategic Plan is only able to be completed and adopted if each Council's annualised housing target is no more than 200 dwellings below its new standard method annual housing need figure.
- 4.5 For Nottingham City, the draft standard method housing need is 26,118 homes over the Strategic Plan period (2023 to 2041). However, Nottingham City has an identified housing land supply of 26,690, and it is proposed that this higher figure is adopted as the City's housing target, given the imperative to provide new homes within the City which supports the strategy of promoting urban living, and to fit with the City Council's growth ambitions. In order to comply with the NPPF transitional arrangements, the Borough Councils have increased their housing targets over the level set by the current 2023 standard method to fall within the 200 dwelling annual threshold of the transitional arrangements. This approach enables the Strategic Plan to be completed and adopted under the transitional arrangements and thereby support the early delivery of substantial housing growth.
- 4.6 In the case of Broxtowe and Rushcliffe, there is more than sufficient existing housing supply, as identified in the 2023 Strategic Housing Land

Availability Assessments (SHLAA), to meet their housing targets. Providing for Gedling's housing target will, however, require delivery of non-strategic housing allocations through future plan preparation.

- 4.7 The minimum housing target for each Council is as follows:

Authority	Housing Target
Broxtowe Borough Council	8,250
Gedling Borough Council	8,370
Nottingham City Council	26,690
Rushcliffe Borough Council	11,360
Greater Nottingham	54,670

2023 Standard method

- 4.8 The requirements of the Government's standard method (as at March 2023) for determining housing need are set out in Table 1 below. In summary, annual housing need for the Greater Nottingham area as at April 2023 is 3,298 new homes, equating to 59,364 new homes for the Plan period. The housing supply of 59,070 meets the vast majority of this need. However, the housing supply figure in Nottingham City (which forms its housing target) is below the 2023 standard method need, whilst housing supply in Broxtowe and Rushcliffe exceeds the 2023 standard method level of need. In Gedling, housing supply will be supplemented in order to meet its housing target, and this will take it to a level that will exceed the 2023 standard method level of housing need for the Borough.
- 4.9 Nottingham City is one of the 20 largest urban areas in England, and therefore the 2023 standard method applies a 35% uplift to its need. The Government justifies this by arguing it will help to prioritise brownfield and other under utilised urban sites, to utilise existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable (2023 NPPF footnote 27).
- 4.10 Whilst Nottingham is anticipated to meet its full 2023 standard method derived housing need (including the 35% uplift) in the medium term, it cannot meet the entirety of its need for the full Plan period to 2041.
- 4.11 All the Councils refreshed their SHLAAs in 2023. In the case of Gedling, there is a recognition that the identified supply will require supplementing by at least 1,044 homes in order to meet its housing target. The housing target set for Gedling recognises the area's growth ambitions, but also the Borough's overall housing supply constraints. Providing for this figure will require the delivery of non-strategic sites through future plan preparation.

- 4.12 The results from the SHLAAs are shown in Table 1, which shows the housing land supply and the 2023 standard methodology derived housing need to 2041.

Table 1: 2023 Housing Need (2023-2041) vs Estimated Housing Supply

	2023 Standard Method Housing Need 2023-2041	Current Estimated Housing Supply * 2023-2041	Difference
Broxtowe Borough	6,912	9,861	2,949
Gedling Borough	8,280	8,370**	90
Nottingham City	33,210	26,686	-6,524
Rushcliffe Borough	10,962	14,144	3,182
Greater Nottingham	59,364	59,061	-303

* Current estimated supply (for example, sites with planning permission or already included in adopted Local Plans).

** Gedling has an identified supply of 7,326 homes. The shortfall of 1,044 to meet its housing target will be made up through future non-strategic allocations.

- 4.13 In summary, Broxtowe and Rushcliffe have an excess of housing supply over need, whilst Gedling and Nottingham have shortfalls. Assuming that the position in Gedling will be rectified through new non-strategic allocations, this leaves Nottingham City with a shortfall of 6,524, but the Plan area as a whole having a shortfall of only 303 homes.
- 4.14 In order to ensure that the minimum housing targets are delivered, each Council applies a 'lapse rate' to planning permissions in their housing supply. This lapse rate is based on the proportion of dwellings with planning permission which have not yet been implemented over a rolling 10 year period projected forward onto the anticipated supply.
- 4.15 The unmet housing need in Nottingham City is part of the 35% uplift, and therefore not evidenced in terms of actual local housing need, nor in terms of delivery. The NPPF (paragraph 62) states that "The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework." Although the housing supply is very close to the Plan's total need, there is no cross boundary voluntary agreement in place in Greater Nottingham to redistribute any of the uplift. However, under the draft standard method (see below) any redistribution of need from Nottingham City is not relevant.

- 4.16 The housing need for the Plan area would be 50,760 between 2023 and 2041 without a 35% uplift being applied to Nottingham City's housing need figure. The Strategic Plan's proposed housing target of 54,670 exceeds this baseline figure and therefore also goes part way in meeting the 35% uplift.

Draft 2024 Standard method

- 4.17 The Government published a proposed revision to the standard method of calculating an area's housing need in August 2024. This would base the figure on an area's existing housing stock rather than the 2014 household projections as is used currently. It would continue to include an affordability adjustment, but also delete the 35% uplift requirement for the 20 largest urban areas in England.
- 4.18 The 2024 draft new standard method housing need for Greater Nottingham over the Plan period would be 64,890, this is an increase over the 2023 housing need figure (59,364) of 5,526. The new standard method would result in increased housing need in Broxtowe, Gedling and Rushcliffe Boroughs, but a lower need in Nottingham City.
- 4.19 Table 2 below shows how the Greater Nottingham housing supply figures from 2023 Strategic Housing Land Availability Assessments compare to the level of housing need as calculated using the draft 2024 standard method.

Table 2: 2024 New Housing Need (2023-2041) vs Housing Supply

	2024 Draft New Standard Method Housing Need 2023-2041	Current Estimated Housing Supply 2023-2041*	Difference
Broxtowe Borough	11,844	9,861	-1,983
Gedling Borough	11,970	8,370**	-3,600
Nottingham City	26,118	26,686	568
Rushcliffe Borough	14,958	14,144	-814
Greater Nottingham	64,890	59,061	-5,829

* Current estimated supply (for example, sites with planning permission or already included in adopted Local Plans).

** Gedling has an identified supply of 7,326 homes. The shortfall of 1,044 to meet its housing target will be made up through future non-strategic allocations.

2024 NPPF Transitional Arrangements

- 4.20 Paragraph 226 of the draft 2024 NPPF sets out transitional arrangements for local plans that are to be published before, or within one month, of the publication of the new NPPF, expected at the end of 2024. Where the emerging annual housing requirement is 200 dwellings or fewer below the published relevant Local Housing Need figure (this being the figure derived from the draft new methodology), the plan can be examined under the current 2023 NPPF.
- 4.21 The Councils intend to publish the Strategic Plan before the end of 2024, and therefore are proceeding under these transitional arrangements. The option of waiting for a final revised NPPF, conducting a further Green Belt review and starting the plan making process again has been rejected, as there is a pressing need to put adopted plans into place as soon as possible to provide planning certainty and ensure early delivery of strategic sites. Starting the plan making process from scratch would take several years and require a full update of the evidence base at considerable cost.
- 4.22 Table 3 below shows the Strategic Plan housing targets fall within the scope of the transitional arrangements.

Table 3: Compliance with Draft NPPF Transitional Arrangements

	Draft 2024 NPPF Housing Need (plan period) 2023-2041	Housing Target 2023-2041	Housing Target minus Housing Need (2023- 2041)	Housing Target minus Housing Need (annual average)
Broxtowe Borough	11,844	8,250	-3,594	-200
Gedling Borough	11,970	8,370	-3,600	-200
Nottingham City	26,118	26,690	572	32
Rushcliffe Borough	14,958	11,360	-3,598	-200
Greater Nottingham	64,890	54,670	-10,220	-568*

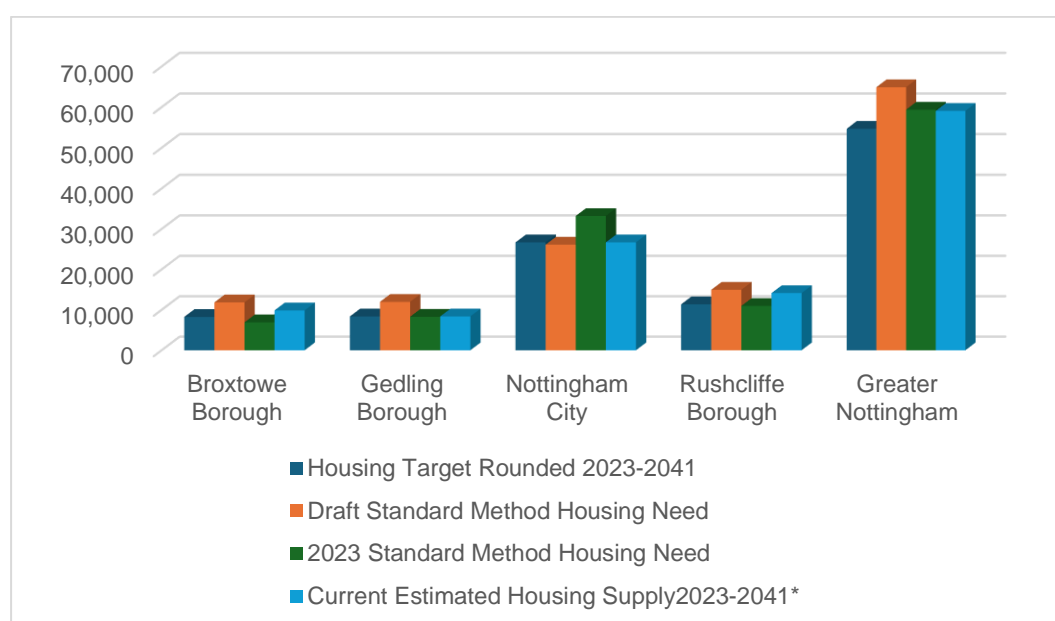
* This equates to an average of -142 between each of the four councils.

- 4.23 As required to satisfy the transitional arrangements, the difference between each of the council's annual Housing Target and the new annual standard method housing need is 200 homes or fewer. Moreover, footnote 83 of the draft 2024 NPPF explains that where joint local plans are in preparation, the total plan shortfall is to be apportioned

to each local authority equally to determine whether a shortfall exceeds 200 dwellings per annum. Following this approach results in a shortfall of 142 homes per authority (568 divided by 4).

- 4.24 Figure 1 shows how the housing targets compare with housing need calculated using both the draft standard method and the current 2023 standard method, and housing supply. It assumes the housing supply in Gedling is made up through future non strategic allocations.

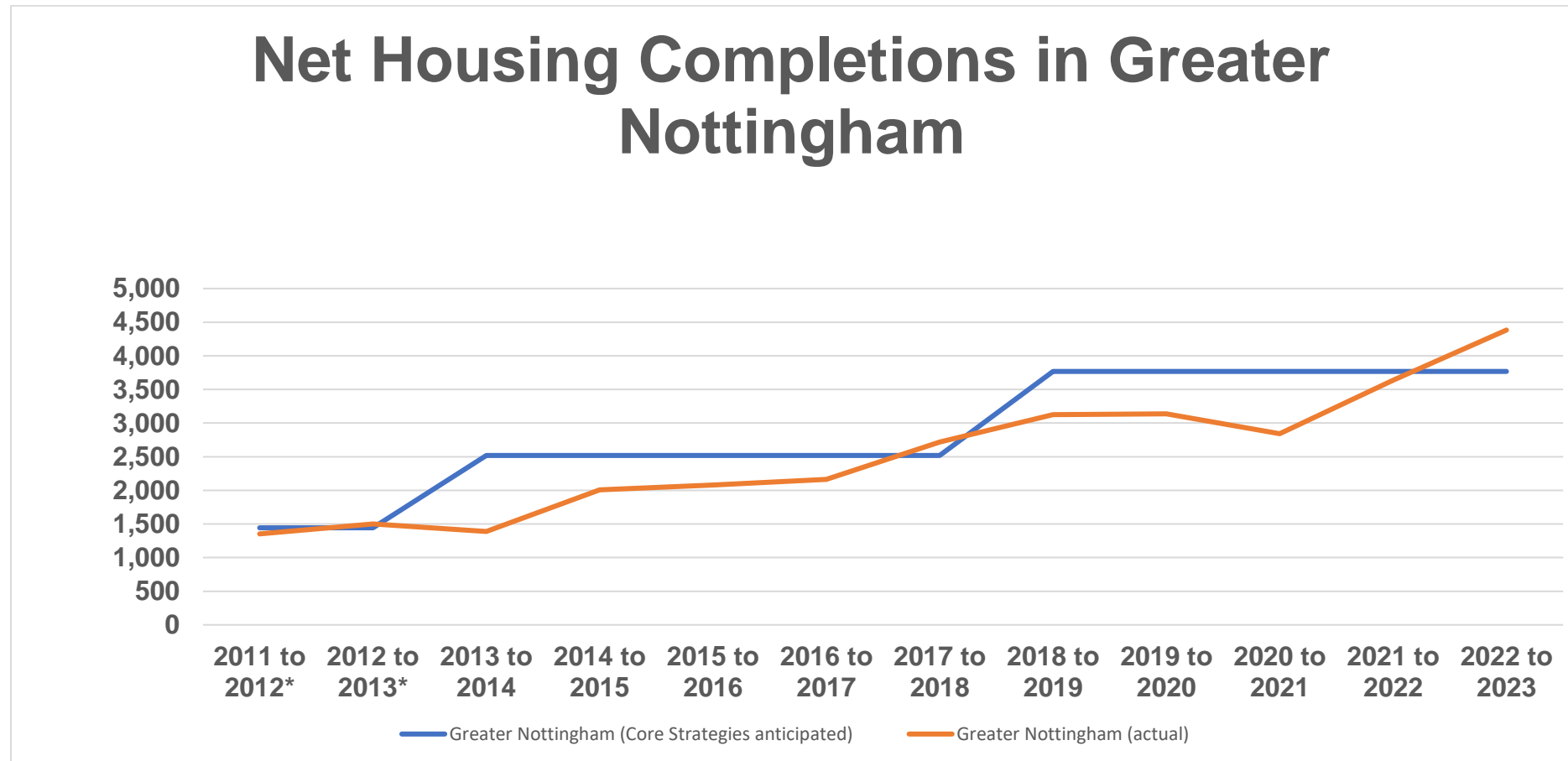
Figure 1: Summary of Housing Need, Targets and Supply 2023 to 2041



Past delivery

- 4.25 Consideration of past delivery can give an indication of the ability of Greater Nottingham to deliver sufficient housing, given an ongoing supply of developable sites.
- 4.26 Figure 2 and Table 4 below sets out the net housing completions for the plan making authorities each year since 2011 (the base date of current Core Strategies), together with the number of completions anticipated in the Core Strategies. It shows a broad upward trend in housing completions, albeit there is still a shortfall against Core Strategy provision over the whole period. The position does vary across the authorities, but with adopted part two Local Plans, which release sites that were formerly in the Green Belt, the upward trend is expected to continue. The shortfall between Core Strategy provision and actual completions was anticipated to be made up in the medium term (i.e. by 2028), however this is subject to economic conditions.

Figure 2



* For the first two years, the anticipated figures were based on actual completions.

Table 4: Net Housing Completions in Greater Nottingham

	2011 to 2023	2011 to 2012*	2012 to 2013*	2013 to 2014	2014 to 2015	2015 to 2016	2016 to 2017	2017 to 2018	2018 to 2019	2019 to 2020	2020 to 2021	2021 to 2022	2022 to 2023
Broxtowe Borough Council (Core Strategy anticipated)	4,150	100	100	360	360	360	360	360	430	430	430	430	430
Broxtowe Borough Council (actual)	2,570	140	67	150	78	101	285	324	301	232	267	303	322
Gedling Borough Council (Core Strategy anticipated)	5,100	250	250	440	440	440	440	440	480	480	480	480	480
Gedling Borough Council (actual)	3,747	275	227	321	311	174	198	237	286	360	310	357	691
Nottingham City Council (Core Strategy anticipated)	11,300	475	475	880	880	880	880	880	1,190	1,190	1,190	1,190	1,190
Nottingham City Council (actual)	14,354	422	799	463	1,022	947	974	1,393	1,456	1,806	1,407	1,722	1,943
Rushcliffe Borough Council (Core Strategy anticipated)	9,350	250	250	470	470	470	470	470	1,300	1,300	1,300	1,300	1,300
Rushcliffe Borough Council (actual)	6,748	294	209	199	373	487	528	593	760	494	650	1,011	1,150
Greater Nottingham (Core Strategies anticipated)	29,900	1,075	1,075	2,150	2,150	2,150	2,150	2,150	3,400	3,400	3,400	3,400	3,400
Greater Nottingham (actual)	27,429	1,131	1,302	1,133	1,784	1,709	1,985	2,547	2,803	2,892	2,634	3,393	4,116

5. Housing supply

- 5.1 This section sets out the approach used for calculating the housing supply for each of the Councils for the Greater Nottingham Strategic Plan.

Strategic Housing Land Availability Assessment

- 5.2 The Strategic Housing Land Availability Assessment (SHLAA) is an annual review of sites undertaken by councils to identify sites that have potential for residential development. It helps the councils to understand where and when housing could be built in the future.
- 5.3 The Review of Greater Nottingham SHLAAs published by Arup in July 2019 made a number of recommendations on how greater consistency between the SHLAAs undertaken by each council could be achieved. In response, a common methodology for undertaking a SHLAA was set out in the Greater Nottingham Planning Partnership's Joint Methodology Report for Strategic Housing Land Availability Assessments (SHLAAs) published in November 2020 by Broxtowe Borough Council, Erewash Borough Council, Gedling Borough Council, Nottingham City Council, and Rushcliffe Borough Council supported by specific council appendices. This will be referred to as the "SHLAA methodology report" throughout in this background paper.
- 5.4 The SHLAA methodology report and supporting appendices were updated in November 2023 and the Councils have also published their 2023 SHLAAs which are available on the following web pages:-
- Web link to SHLAA methodology report [here](#).
 - BBC web link for SHLAA [here](#).
 - GBC web link for SHLAA [here](#).
 - NCC web link for SHLAA [here](#).
 - RBC web link for SHLAA [here](#).

Source of housing supply

- 5.5 The housing supply for the Greater Nottingham Strategic Plan is shown in Table 5 below. This is based on the Councils' SHLAA 2023. Appendix A includes a housing trajectory for each Council.

Table 5 Breakdown of Housing Supply

	Broxtowe	Gedling*	Nottingham City	Rushcliffe	Total
Existing supply	3,159	3,782	15,112	3,737	25,965
Strategic sites (GNSP)	3,417	1,515	1,707	7,257	13,896
Windfall allowance	3,285	2,070	10,074	3,150	18,579
Non Implementation allowance	-190	-41	-161	-31	-432
Total	9,861	7,326	26,686	14,144	58,017

* Gedling's existing supply, not including assumptions about making up Gedling's shortfall through future allocations in and therefore not comparable to Tables 1 and 2, or Figure 1.

- 5.7 The split between greenfield and previously developed (brownfield sites) is shown in table 6 below.

Table 6 Greenfield/Brownfield Housing Supply (not including windfall)

Authority	Previously developed land percentage	Greenfield percentage	Mixed Greenfield / previously developed percentage*
Broxtowe Borough Council	55%	45%	N/A
Gedling Borough Council	9%	91%	N/A
Nottingham City Council	92%	8%	N/A
Rushcliffe Borough Council	11%	63%	26%

* This applies to Rushcliffe only. The other Councils do not use a 'mixed' category.

Flexibility

- 5.7 The objectively assessed housing need is the minimum number of homes needed. In order to ensure the minimum number of homes is delivered, flexibility is achieved through the following measures.

Strategic allocations

- 5.8 Dwelling capacity figures indicated for strategic allocations are approximate. Planning permission may be granted for proposals with higher or lower numbers of homes subject to the overall scheme being considered suitable and sustainable.

Non-implementation (lapse rates)

- 5.9 The SHLAA methodology report states the following:-

“46. Paragraph 024 of the national Planning Practice Guidance states that once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how many new homes can be provided and at what point in the future delivery is expected (i.e. within five years, years 6 to 10 and year 11 and beyond). An overall risk assessment should be made as to whether sites will be implemented as anticipated.

47. A consistent approach has been taken by Broxtowe, Gedling, Nottingham City and Rushcliffe Borough Councils to establishing a non-implementation rate for each Council, based on the proportion of dwellings with planning permission which have not yet been implemented on small and medium/large sites over a 10 year period to compensate for potential non-implementation... The non-implementation rates will be applied to the totalled figure of all unimplemented sites with planning permission i.e. sites where construction work has not started.”

Safeguarded land

- 5.10 Gedling and Rushcliffe Borough Council identify safeguarded land. The availability of safeguarded land does allow for proposals for residential development to be considered under the presumption in favour of sustainable development if the Council is unable to demonstrate a five year supply of land, as evidenced by case law.

Green Belt

- 5.11 For Broxtowe, Gedling and Rushcliffe Borough Councils it is considered that the need for any further flexibility through the allocation of land over and above the housing requirement needs to be balanced against the fact that any additional allocations would be most likely met through land which is in the Green Belt.

Small and medium sized sites

- 5.12 The NPPF states that development plans should accommodate at least 10% of housing supply on sites of no more than one hectare, unless there are strong reasons why this is not possible. As the Strategic Plan only allocates strategic sites, each Council will consider this requirement through future plan preparation.

Five Year Housing Land Supply

- 5.13 Each authority can demonstrate that the Strategic Plan will deliver at least a five year supply of specific, deliverable sites in accordance with paragraph 76 of the NPPF. Each Council's five-year land supply position as of 31st March 2023 is as follows:

Broxtowe 6.9 years
([Broxtowe-Five-Year-Housing-Land-Supply-2023](#))

Gedling 6.8 years
([Gedling Five Year Housing Land Supply 2023](#))

Nottingham City 9.1 years
([Nottingham-City-Five-Year-Land-Supply-2023](#))

Rushcliffe 8.3 years
([Rushcliffe-Five-Year-Land-Supply-2023](#))

6. Affordable Housing

Affordable Housing definitions

- 6.1 Affordable housing is defined in the glossary to the NPPF (2023) as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential workers); and which complies with one or more of the following definitions: a) affordable housing for rent, b) starter homes, c) discounted market sales housing and d) other routes to affordable home ownership. Further description on categories a-d is provided in the NPPF glossary.

Housing Needs

- 6.2 Paragraph 63 of the NPPF requires planning policies to take into account the housing needs of different groups in respect of size, type and tenure. The specific groups named under this paragraph are those who require affordable housing, families with children, older people (including those who require retirement housing, housing-with-care and care homes), students, people with disabilities, people who rent their homes and people wishing to commission or build their own homes.
- 6.3 Paragraph 64 of the NPPF states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (having regard to the types of affordable housing included in the NPPF glossary definition).
- 6.4 The Planning Practice Guidance on housing needs assessments states that authorities will need to consider how the needs of individual groups can be addressed once the overall need is established. The need for particular sizes, types and tenures of homes as well as the housing needs of particular groups should be considered separately.
- 6.5 The requirement for Local Plan policies to take into account First Homes was announced in the Written Ministerial Statement (WMS) published on 24 May 2021. This states that local plans and neighbourhood plans should take into account the First Homes requirement from 28 June 2021. Further detail on First Homes and the expectations for plan making is set out in the Guidance. This states that First Homes should account for at least 25% of all affordable housing units delivered by developers through planning obligations and that this requirement should be set out in local plans. (However, the paragraph 66 of the NPPF which concerns affordable home ownership products qualifies this "...unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.")
- 6.6 The Greater Nottingham and Ashfield Housing Needs Assessment Report (HNA - October 2020 updated in March 2024) prepared by Iceni

consultants was commissioned to address the requirements of the NPPF in respect of paragraphs 63 and 64. The study was commissioned jointly with the Plan area authorities along with Erewash and Ashfield Councils, although Erewash was not involved in the 2024 update. The 2020 study was commissioned and published prior to the publication of the WMS, however the update does take account of First Homes.

- 6.7 The key recommendations from the HNA report and the policy response to these are summarised in the table below. Further description on each of these is included in the section below which looks at housing needs of each group referred to in paragraph 63 of the NPPF. A summary of the existing policy approaches to affordable housing and housing mix is also included in the section following the table.

Table 7: Key findings/recommendations of the Housing Needs Assessment Reports and policy response

Key finding / recommendation	Policy response
<u>Housing sub market areas</u> The report identifies 44 housing sub market areas across the Plan area. The methodology for their identification has been based on analysis of data on sales transactions by type, house price patterns by type, commuting flows, self-containment and urban form/morphology.	The housing sub market areas have been taken into account in subsequent viability work. Due to the varying levels of viability across authority areas it may be considered appropriate to set different levels of affordable housing and tenure requirements based on sub market area.
<u>Housing mix</u> Housing mix recommendations at an authority level and housing sub market area (in terms of bedroom sizes).	The justification text to Policy 8 includes the housing mix recommendations (by tenure) at an authority level. The policy requires these to be used as a starting point for negotiations on house size and mix on application sites.
<u>Rented affordable housing need</u> A high level of affordable housing need for rented products across the Plan area. Need for 3,684 rented affordable homes per annum across the Plan area (458 in Broxtowe, 514 for Gedling, 1,729 in Nottingham and 507 for Rushcliffe). The report does not break this need down into social rent and affordable rent.	The need figures for each authority have been used to develop a range of affordable housing target figures which have been tested through the viability work. The identified level of need identified in the report provides a starting point for the local authorities' affordable housing targets.
<u>Affordable home ownership need</u>	The need figures for each authority have been used to

Key finding / recommendation	Policy response
<p>A negative need for -495 affordable home ownership products per annum across the Plan area (-42 Broxtowe, -17 Gedling, -364 Nottingham City and +30 in Rushcliffe). The analysis shows there are a number of households able to afford to rent privately but who cannot afford to buy because of the initial outlay/deposit/securing a mortgage. There was considered to be enough potential supply within existing stock to make a contribution to this need with a reasonable proportion of properties available at lower quartile prices.</p>	<p>develop a range of affordable housing target figures to be tested through the viability work. A range of different affordable housing levels and tenure requirements have been tested.</p>
<p><u>Shared ownership</u> is recommended as the most appropriate type of affordable home ownership product, where this is sought.</p>	<p>This recommendation can be used to evidence the Councils' approaches to affordable housing mix.</p>
<p><u>Accessible and adaptable homes</u> Given the evidence of an ageing population and the scale of growth in those with a disability, the Councils could consider (as a starting point) requiring all dwellings (in all tenures) to meet the M4(2) accessible and adaptable standards and seek a proportion (maybe up to 5%) of all new market homes to be M4(3)(A) wheelchair accessible compliant and potentially a higher figure in the affordable sector (say 10%) to be M4(3)(B) wheelchair adaptable.</p>	<p>Policy 8 Housing Size, Mix and Choice has included a requirement for all dwellings to comply with the M4(2) accessible and adaptable standards unless it is demonstrated that it would not be viable or technically feasible to do so. It does not include any specific targets in relation to wheelchair accessible and wheelchair adaptable homes. It is considered that policies in the Councils' Part 2 Local Plans address the issue appropriately or the review of the Part 2 Local Plans will ensure this is updated accordingly to reflect the findings of the report.</p>
<p><u>Specialist residential accommodation</u> Across the Plan area and Ashfield, the analysis in this report points to a need for 3,381 units of housing with support to 2041, and 4,026 units of housing with care. These figures are also</p>	<p>Policy 8 Housing Size, Mix and Choice has not included any specific targets in relation to specialist accommodation for older people. It is considered that policies in the Councils' Part 2 Local Plans address the issue appropriately or subsequent</p>

Key finding / recommendation	Policy response
broken down by district. The report also identifies a need for 3,775 additional bed spaces (C2 Use class) across the Plan area (also broken down by district).	Local Plans will ensure this is updated accordingly to reflect the findings of the report.
<u>Private rented sector/Build to Rent</u> The HNA recommends that the Councils duly recognise the role of Build to Rent development and develop planning policies which help to support it and provide clarity on how other policies may impact it.	Part 10 of Policy 8 Housing Size, Mix and Choice sets out a permissive approach in respect of Build to Rent schemes. The justification text to the policy sets out specific named locations that would be considered potentially appropriate for such proposals. Policy 6 Nottingham City Centre specifically encourages Build to Rent here.

Affordable Housing Need, housing mix and housing standards

- 6.8 The HNA study provides an overall assessment of the need for affordable housing in the study area, based around the PPG on Housing and Economic Needs Assessments. The need is broken down to rented (social/affordable) and affordable home ownership. The rented need figure is calculated by adding current affordable housing need to the projected number of households falling into need and existing households falling into need and subtracting the number of relets from this gross need figure to arrive at a net affordable housing figure.
- 6.9 In terms of affordable home ownership need, the consultants have applied broadly the same principles, i.e. consider a current need; a newly arising need on an annual basis; existing households falling into need and an annual estimate of supply.
- 6.10 Policy 8 Housing Size, Mix and Choice sets out the proposed overall affordable housing requirement for each authority including at a housing sub-market area where appropriate. Tenure requirements are specified in the justification text. Tenure requirements take account of paragraph 66 of the NPPF and the WMS which concern affordable home ownership and First Homes.

Current Practice and Proposed Approach in the Strategic Plan

- 6.11 Existing policy approaches to affordable housing, housing mix and housing standards differ across the Plan area. Rushcliffe set overall percentage requirements and tenure requirements through their Part 1 Plan. Broxtowe, Gedling and Nottingham City defer their more detailed requirements to their Part 2 Plans. Neither Broxtowe nor Gedling specify any specific tenure requirements in either Plan. Each authority also has

different requirements in respect of accessible and adaptable homes with these set out in their Part 2 Local Plans.

Broxtowe

- 6.12 Policy 8.5a of the Aligned Core Strategy sets a 30% affordable housing target for Broxtowe with Policy 8.6 stating that any local variation in affordable housing requirements and the mix and threshold will be set out in part 2 Local Plans. Policy 15 (3) of the Part 2 Plan sets overall affordable housing percentages at a housing submarket level. The tenure requirements are decided by negotiation at planning application stage. Policy 15 (7) requires at least 10% of dwellings on sites over 10 dwellings to comply with requirement M4 (2) of the Building Regulations regarding 'accessible and adaptable dwellings'. Neither Part 1 nor Part 2 Local Plans currently set out any prescriptive requirements in terms of house sizes for open market housing mix.
- 6.13 The Greater Nottingham Strategic Plan Policy 8: Housing Size, Mix and Choice confirms the proportion of affordable housing which the Borough will seek on all sites of 10 dwellings or more or 0.5ha or more is 20% or 30%. The requirement is based on the approach established in the Broxtowe Part 2 Local Plan for existing allocations and strategic sites and then applies a distinction between brownfield and greenfield sites for new windfall sites due to the varying levels of viability identified within the plan wide viability. In response to evidence of need, the financial viability of different affordable housing tenures and the 2023 NPPF requirement for 10% of all homes on major sites to be available for affordable home ownership, of the total proportion of affordable housing sought, Broxtowe Borough Council will require 75% affordable housing for rent and 25% affordable home ownership. Any divergence from this approach would need to be based on evidence of need (including, where appropriate, housing tenure, property type and size and existing tenure mix in the local area) and viability considerations.

Gedling

- 6.14 Policy 8.5b of the Aligned Core Strategy sets a 10%, 20% or 30% overall affordable housing percentage for Gedling (depending on location and specifying further detail will be provided in part 2). The Affordable Housing SPD (December 2009) and Policy LPD36 of Local Plan Part 2 provide more detail and specify the affordable housing requirements for each housing submarket area. The Interim Planning Policy Statement on First Homes (October 2022) addresses the need for First Homes and other affordable housing tenure requirements. Neither Local Plan 1 nor 2 set out any prescriptive requirements in terms of house sizes for open market housing mix (i.e. number of bedrooms). There are no requirements for either M4 (2) or M4 (3) housing of the Building Regulations in the Part 2 Local Plan.
- 6.15 Policy LPD 39 of the Gedling Local Plan 2 is a criteria based policy for assessing the suitability of proposals for C2 use.

- 6.16 The Greater Nottingham Strategic Plan Policy 8: Housing Size, Mix and Choice confirms the proportion of affordable housing which the Borough will seek on all sites of 10 dwellings or more or 0.5ha or more is 20% or 30% depending on location unless this level of provision makes development unviable and in which case a lower requirement would need to be fully justified by evidence. The preferred tenure mix is 75% affordable housing for rent and 25% affordable home ownership.

Nottingham City

- 6.17 Policy 8.5c of the Aligned Core Strategy sets a 20% overall affordable housing percentage for Nottingham City. In terms of tenure requirements, Policy HO3 of Nottingham City Local Plan Part 2 specifies differential tenure requirements based on total number of units. It requires at least 10% of homes to be available for affordable home ownership on sites of between 10 and 14 homes and 20% of the total homes to be affordable on sites of 15 or more or 0.5 hectares or more with at least 10% of those for affordable home ownership with the remainder to be other forms of affordable housing.
- 6.18 The first part of Policy HO4 requires at least 10% of new dwellings to be developed as M4 (2) 'accessible and adaptable' on sites of 10 or more homes. The second part of the policy is criteria based for assessment of proposals for "specialist housing for older people, other vulnerable groups and hostel accommodation".
- 6.19 Policy HO5 specifies the preferred locations for purpose built student accommodation.
- 6.20 The Local Plan Part 1 includes policy on house types, advising that in Nottingham City there should be an emphasis on providing family housing (defined as three or more bedrooms), including larger family housing, and within the City Centre there should be an emphasis on flats of two or more bedrooms to diversify the existing mix, together with innovative family housing on the City Centre fringes. The Local Plan Part 2 also requires Nationally Described Space Standards.
- 6.21 The Greater Nottingham Strategic Plan Policy 8: Housing Size, Mix and Choice takes into account the evidence of the HNA that there is no need for affordable home ownership products within Nottingham City. The policy rolls forward existing proportions of affordable housing on sites of between 10 and 14 homes, and on sites of 15 or more homes or 0.5 hectares, but it excludes affordable home ownership from the tenure mix. It sets social rent as the preferred tenure, but has flexibility to permit substitution with affordable rent where social rent presents viability challenges.

Rushcliffe

- 6.22 Policy 8 of the Rushcliffe Local Plan Part 1: Core Strategy sets overall affordable housing percentages at a housing submarket level. The specific tenure requirements are included in the justification text to the policy and requires 42% intermediate, 39% affordable rent and 19% social rent. This policy will be superseded by Strategic Plan Policy 8.
- 6.23 Policy 12 of the Rushcliffe Local Plan Part 2 requires 1% of new homes on sites of 100 dwellings or more to be built to Building Regulation M4 (3)(2)(a) standard. Neither Local Plan Part 1 nor Part 2 set out any prescriptive requirements in terms of house sizes for open market housing mix (i.e. number of bedrooms).
- 6.24 Policy 14 of the Rushcliffe Local Plan Part 2 is a criteria based policy for assessing suitability of proposals for C2 use (residential institutions).
- 6.25 The Greater Nottingham Strategic Plan Policy 8: Housing Size, Mix and Choice confirms the proportion of affordable housing which the Borough will seek on all sites of 10 dwellings or more or 0.5ha or more is 30% unless this level of provision makes development unviable and in which case a lower requirement would need to be fully justified by evidence. The preferred tenure mix is 75% affordable housing for rent (equally split between social rent and affordable rent) and 25% affordable home ownership.

Rural Areas

- 6.26 Policy 8 Housing Size, Mix and Choice details the affordable housing requirements for the rural area, specifically allowing for rural exception site development, in line with the NPPF. The requirement for an up to date needs survey will help ensure such developments will meet identified need (both in terms of overall numbers and the type, size and tenure) and minimise the risk of housing being built where there is no need, or housing being built of the wrong type.

7. Housing Mix

- 7.1 Paragraph 63 of the NPPF states that, within the context of establishing need, the size, type and tenure of housing for different groups in the community should be assessed and reflected in planning policies. In addition to those households in need of affordable housing, these groups are listed at paragraph 6.2.

Families with Children

- 7.2 The report shows that looking across the whole study area, there is a smaller dwelling profile in the owner-occupied sector (notably the relatively low number of four or more bedroom homes). For the social rented and private rented sectors differences are typically less, although it is notable that the study area sees a relatively high proportion of one bedroom homes in both of the rented sectors.
- 7.3 At a local authority level, key features of this include high proportions of three bedroom market homes in Nottingham and a large proportion of four or more bedroom homes in Rushcliffe.
- 7.4 The analysis in the HNA report has taken into account how people of different ages occupy homes, market evidence and modelled outputs. The analysis has also factored in the projected growth of family households in order to ensure that prospective development responds to the need for family-sized housing in particular areas; and the assessment has also reviewed recent development trends to better understand particular market strengths and identify any gaps in the market.

Older people and people with disabilities

- 7.5 The HNA report analyses current and projected needs for age (including projected increases in older people with dementia or mobility problems) and younger people with disabilities. The report states that the analysis provides clear evidence for justifying delivering 'accessible and adaptable' homes as defined in Part M4(2) of Building Regulations, subject to viability testing and site suitability; and, where possible, 'fully adapted homes' as defined in Part M4(3) of the same document. A need for around 3,203 wheelchair accessible dwellings for wheelchair users across the study area (including Ashfield and Erewash) has been identified, equivalent to 5% of the total housing need identified through the standard method.
- 7.6 In line with the Planning Practice Guidance, some older households, particularly those aged over 75, will require specialist housing provision. Across the Plan area, the analysis in this report points to a need for 3,381 units of housing with support to 2041, and 4,026 units of housing with care. These figures are broken down by district. The report also identifies a need for 3,775 additional bed spaces (C2 Use Class) across the Plan area (also broken down by district).

- 7.7 The draft policy has not included any specific targets in relation to specialist accommodation for older people. It is considered that policies in the Councils' Part 2 Local Plans address the issue appropriately, and subsequent Local Plan reviews will ensure this is updated accordingly to reflect the findings of the report.

Students

- 7.8 The HNA report highlights that, as at 2021/22, HESA data shows there were 78,725 students enrolled at the two universities (37,260 at the University of Nottingham and 41,465 at Nottingham Trent University). 2021 Census information shows that there were 5,692 all-student households in the study area. The vast majority of all-student households are located in Nottingham with other notable numbers of all-student households found in Broxtowe and Rushcliffe. Within the study area, the largest concentrations are in the Radford and Lenton & Wollaton East wards in the west of the City where at least a quarter of all households are all-student households. In addition, there remains a particular concentration of all-student households in the Beeston Central ward (7.4% of all households) and to a lesser degree the Beeston North ward (2.8%).
- 7.9 The majority of students reside in Nottingham City, and in places the concentration of HMOs has giving rise to particular issues which impact on residential amenity. Nottingham City Council operates an Article 4 direction for HMOs covering the entire City. Nottingham City's Part 2 Local Plan contains a range of policies to manage student accommodation, which includes the promotion of purpose built student accommodation in certain areas (including the City Centre) with the aim of offering a choice of good quality accommodation, to help to release 'on street' houses back to general occupation.
- 7.10 Broxtowe Borough also operates an Article 4 direction, covering those areas of Beeston where student households are most concentrated, supported by a Supplementary Planning Document giving guidance as to how the Article 4 direction is implemented.

Service families

- 7.10 The needs of service families (families where the head of household is a member of the armed forces) have not been considered as part of the HNA study. Housing need for service families is not considered to be a significant issue within the study area, and therefore no specific policies are proposed.

Private rented housing

- 7.11 The HNA report includes a section analysing the private rented sector in the study area. This highlights the growth in the sector over recent years

and the particular demographic profile of people seeking this type of housing (i.e. people in their 20's and 30's).

- 7.12 The HNA report recommends that the Councils duly recognise the role of Build to Rent development and develop planning policies which help to support it and provide clarity on how other policies may impact it. The Planning Practice Guidance on build to rent states that authorities should specify the circumstances and locations where build to rent schemes would be encouraged. Part 10 of Policy 8 sets out a permissive approach in respect of build to rent proposals. The justification text to the policy sets out specific named locations that would be considered potentially appropriate for such proposals. Build to Rent is also referenced in the Nottingham City Centre policy.

Self and Custom Build

- 7.13 There is no reference to custom and self-build in the draft policy as these are covered by the Councils' Part 2 Local Plans.

8. Gypsy and Traveller and Travelling Showpeople Housing Need

- 8.1 The Government's Planning Policy for Traveller Sites (updated 2023) states that local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of travellers in their area. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Accordingly, the Greater Nottingham authorities currently include a Strategic Policy in their Aligned Core Strategies and Broxtowe, Gedling and Nottingham Councils also have policies covering this issue in their Part 2 Plans.
- 8.2 A Gypsy and Traveller Accommodation Assessment (GTAA) was completed by RRR consultancy in 2021, it assesses the accommodation need of Gypsies, Travellers, Showpeople and boat dwellers. It looks at need to 2038 (the originally proposed end date of the Plan). As the Government requires more frequent local plan reviews, the 2038 target is used in the Strategic Plan, in the expectation that the Strategic Plan will be replaced prior to 2038 in line with the expectations of the Levelling Up and Regeneration Act, and that subsequent Local Plans will include more specific policies. A further GTAA covering the period to 2041 will be commissioned to inform these subsequent Local Plans.

Gypsy and Traveller Need

- 8.3 The GTAA used three different approaches to establishing need. First, one based on the ethnic identity definition; second, based on the needs of families who have *not* permanently ceased to travel (i.e. based on the previous 2015 definition); and third, based on the 'travel to work' interpretation of PPTS 2015.
- 8.4 Subsequent to the Study being published, the Government published updated guidance in December 2023 to define Gypsies and Travellers as 'persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' education or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.' Therefore, the definition has reverted to the 2012 ethnic definition.

Table 8 Summary of Gypsies and Traveller accommodation needs 2020-38 (pitches)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2020-25	28	17	7
Total 2025-30	6	5	4
Total 2030-35	6	5	4
Total 2035-38	4	3	2
Total 2020-38	44	30	17

Table 9 Gypsies and Traveller Accommodation needs by Council area 2020-38 (pitches)

Authority	Pitches
Broxtowe Borough	1
Gedling Borough	1
Nottingham City	21
Rushcliffe Borough	20

Proposed approach

- 8.6 The Gypsy and Traveller Accommodation Assessment will be used as the evidence base for policy development and supersedes any previous GTAA's including any levels of accommodation needs calculated prior to the 2021 assessment. There are a range of options available to meet need including the expansion of existing provision and/or providing new sites. In addition, sites and yards with temporary permission will be reviewed with the option of making them permanent as well as reviewing unauthorised sites and yards for their suitability for permanent status.
- 8.7 It is viewed that a general criteria based policy approach in meeting need is required within the GNSP which will provide guidance as to where provision should be steered. Where appropriate, the allocation of sites will then be addressed through future plan making (particularly in view of the impact Green Belt areas have on availability of sites, which can only be allocated through a review of Local Plans). Policies for Travelling Showpeople are also proposed to be included in subsequent Local Plans.

**Table 10 Showpeople accommodation needs by Council area
2020-38 (plots)**

Authority	Plots
Broxtowe Borough	0
Gedling Borough	8
Nottingham City	22
Rushcliffe Borough	0
Greater Nottingham Total	30

Delivery

- 8.8 Existing Local Plans for Broxtowe, Gedling and Nottingham City do not allocate sites for Gypsies and Travellers or Travelling Showpeople. Within Rushcliffe, planning permission has been granted for four pitches within the Fairham Pastures (Clifton) Strategic Urban Extension. These are expected to be delivered within five years.

Appendix A – Housing trajectories by Council

This appendix comprises a housing trajectory for each Council. The trajectories set out the Councils' expectations of when and where housing will be delivered across the Plan period.

Housing trajectory for Broxtowe Borough Council

	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	2038/ 39	2039/ 40	2040/ 41	Total
Completions on non-allocated sites and identified SHLAA capacity	444	619	405	94	64	93	101	77	5	0	0	0	0	0	0	0	0	0	1,902
Toton SLG and Chetwynd Barracks	0	0	0	100	100	100	200	200	200	200	200	200	200	200	200	200	200	200	2,700
Field Farm Stapleford	31	31	31	31	31	31	31	31	31	31	10	0	0	0	0	0	0	0	320
Boots	0	100	100	100	97	0	0	0	0	0	0	0	0	0	0	0	0	0	397
Local Plan Part 2 sites	114	145	97	84	84	223	156	129	129	66	50	50	50	50	20	0	0	0	1,447
Windfall	0	0	0	219	219	219	219	219	219	219	219	219	219	219	219	219	219	219	3,285
Lapse Rate	-13	-25	-15	-12	-11	-13	-14	-12	-10	-8	-8	-8	-8	-8	-7	-6	-6	-6	-190
Projected completions	576	870	618	616	584	653	693	644	574	508	471	461	461	461	432	413	413	413	9,861
Cumulative Completions	576	1,446	2,064	2,680	3,264	3,917	4,610	5,254	5,828	6,336	6,807	7,268	7,729	8,190	8,622	9,035	9,448	9,861	9,861

Housing trajectory for Gedling Borough Council

	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	2038/ 39	2039/ 40	2040/ 41	TOTAL
Completions on non-allocated sites and identified SHLAA capacity	232	52	28	17	10	206	186	154	109	88	77	56	54	52	52	48	37	32	1490
Teal Close	102	100	104	95	75	0	0	0	0	0	0	0	0	0	0	0	0	0	476
Gedling Colliery/Chase Farm	110	102	90	90	95	16	0	0	0	0	0	0	0	0	0	0	0	0	503
Top Wighay Farm (allocation and extension)		100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	15	0	1515
Local Plan Part 2 (2018)	425	359	232	186	109	267	224	175	108	100	88	75	9						2357
Windfall allowance				138	138	138	138	138	138	138	138	138	138	138	138	138	138	138	2070
Lapse Rate	-11	-6	-5	-3	-2	-3	-4	-3	-1	-1	-1	-1	0	0	0	0	0	0	-41
Total Projected Completions (net)	858	707	549	623	525	724	644	564	454	425	402	368	301	290	290	286	190	170	8370
Cumulative Completions	858	1565	2114	2737	3262	3986	4630	5194	5648	6073	6475	6843	7144	7434	7724	8010	8200	8370	8370

Housing trajectory for Nottingham City Council

	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	2038/ 39	2039/ 40	2040/ 41	Total
Completions on non-allocated sites and identified SHLAA capacity	1505	1865	1698	265	253	995	611	255	165	0	0	0	0	0	0	0	0	0	7612
Broad Marsh	0	0	0	0	0	0	0	125	125	125	125	125	125	125	125	0	0	0	1,000
Boots Campus	0	70	70	67	0	0	0	0	0	0	0	0	0	0	0	0	0	0	207
Stanton Tip	0	0	0	0	0	100	100	100	100	100	0	0	0	0	0	0	0	0	500
Local Plan Part 2 sites	923	651	2,583	825	710	636	381	450	228	120	120	7	0	0	0	0	0	0	7,634
Windfall allowance inc less than 5 dwellings	108	108	108	650	650	650	650	650	650	650	650	650	650	650	650	650	650	650	10,074
Demolitions	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	180
Lapsed Rate	-14	-27	-36	-9	-7	-20	-14	-12	-8	-5	-3	-2	-2	-2	-2	0	0	0	161
Projected completions	2,512	2,657	4,413	1,788	1,596	2,351	1,718	1,558	1,250	980	882	770	763	763	763	640	640	640	26,686
Cumulative Completions	2,512	5,169	9,582	11,370	12,966	15,317	17,035	18,593	19,843	20,823	21,705	22,475	23,239	24,002	24,765	25,405	26,045	26,686	26,686

Housing trajectory for Rushcliffe Borough Council

	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	2038/2 9	2039/ 40	2040/ 41	Total
Completions on non-allocated sites and identified SHLAA capacity	116	213	273	51	15	94	85	0	0	0	177	18	0	0	0	0	0	0	1,042
Land at Melton Road, Edwalton	132	132	132	43	0	12	44	44	0	0	0	0	0	0	0	0	0	0	539
Land at former Cotgrave Colliery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Land at Former RAF Newton	88	88	88	88	61	0	0	0	0	0	0	0	0	0	0	0	0	0	413
Land north of Bingham	132	132	132	132	93	0	0	0	0	0	0	0	0	0	0	0	0	0	621
Land south of Clifton	22	44	176	250	250	250	250	250	250	250	250	250	250	250	8	0	0	0	3,000
East of Gamston/North of Tollerton	0	0	0	0	0	88	176	220	220	220	220	220	220	220	220	220	220	220	2,684
Local Plan Part 2 sites	482	402	410	363	253	269	308	106	38	0	25	44	26	0	0	0	0	0	2,726
Windfall	0	0	0	210	210	210	210	210	210	210	210	210	210	210	210	210	210	210	3,150
Lapse Rate	-1	-3	-5	-1	-1	-2	-2	-1	-1	-1	-6	-1	-1	-1	-1	-1	-1	-1	-31
Projected completions	971	1,008	1,206	1,136	881	921	1,071	829	717	679	876	741	705	679	437	429	429	429	14,144
Cumulative Completions	971	1,979	3,185	4,321	5,202	6,123	7,194	8,023	8,740	9,419	10,295	11,036	11,741	12,420	12,857	13,286	13,715	14,144	14,144