

Greater Nottingham - Broxtowe BC, Gedling BC and Nottingham City Council – Aligned Core Strategies (ACS) Examination Inspector’s Matters, Issues and Questions

Matter 2: The Spatial Strategy and Housing Policy

The main issues are:

*(1) whether the local context, vision and spatial objectives set out in Chapter 2 of the ACS are appropriate, locally distinctive and provide a sound basis for planning the area over the next 15 years; whether Policy 2, the Spatial Strategy, follows logically from the local context, vision and spatial objectives, and is sound (ie, positive, justified, consistent with national policy and capable of delivery); and
(3) whether appropriate provision is made for new housing in the three local authority areas, having regard for the requirements of the National Planning Policy Framework (NPPF) and taking account of the proposed numbers, the phasing and distribution of housing, affordable housing, and provision for gypsies and travellers, and other groups.*

Questions

1. Chapter 2, The future of Broxtowe, Gedling and Nottingham City in the context of Greater Nottingham, has been modified [see CD/REG/03] since the ACS was first published in response to representations and to take account of new information (eg. from the 2011 Census). Does it require any further change or additions to set the context, vision and objectives for the spatial strategy?
2. Is Policy 2 consistent with Nottingham’s Core City status? Does the policy identify all the main components of likely future growth and should it complement the quantitative data on housing development with data on employment land, retail development and jobs¹?

Overall housing provision

3. Is Policy 2, which aims to provide a minimum of 30,550 new homes 2011 to 2028 consistent with the National Planning Policy Framework’s (NPPF) aim to boost significantly the supply of housing and meet the full, objectively assessed needs for housing in the housing market area?² In particular:
 - Some representations refer to more localised levels of housing need, but is there any evidence that the plan is based on an incorrect definition of the Housing Market Area (HMA)?
 - The ACS does not include all the local authority areas that make up the HMA. Have appropriate allowances been made for their likely contributions to meeting the overall need?
 - Have the ACS housing figures taken full account of the fact that the East Midlands Regional Plan has been revoked. Some representors suggest that the Councils have been ‘too wedded’ to its figures?
 - The Councils appear to have assessed the most up-to-date demographic information on housing need (Government 2008-based household projections, 2011 Census and interim 2011-based household projections). Have the messages from these data been

¹ Policy 4 and paragraph 3.4.1 of the Local Plan provide some numerical information

² CD/BACK/01 – Housing Background Paper Addendum 2013 indicates that it is (para 2.2)

- fairly reflected in the Councils' housing figures? Is there any contrary evidence or are there any substantive omissions? Is the latest information sufficiently supportive of the ACS?
- Housing Background Paper Addendum May 2013 [CD/BACK/01] Table 8 suggests the Core Strategy projections for the three authorities should be increased (from about 17,500 to 19,150) to align with the CLG/ONS Interim 2011-based projections to 2021. Should an allowance be made in the ACS for this increase, plus an addition for 2021-2028?
 - Are the calculations of housing need consistent with the most reliable evidence regarding economic factors (job growth and economically active population changes) and future migration?
4. Is the approach to including purpose-built student accommodation in housing provision figures, as described in CD/BACK/01 and said to be consistent with current DCLG policy, reasonable in this case? If it is not possible to project the numbers of students or new flats required to 2028, how exactly has the inclusion of purpose-built accommodation affected the calculation of overall housing need? Does it have the effect of deflating future housing provision?
 5. Overall, does Policy 2 define the settlement hierarchy appropriately, and then identify sufficient and appropriate key sites which are critical to the delivery of the housing strategy over the plan period? (see Qs 23 onwards below)
 6. Is the distribution of sites consistent with the first paragraph in Policy 2 which places emphasis on urban concentration with regeneration, or has there been a relaxation of the East Midlands Regional Plan-based policy (of concentration on sites in the Principal Urban Area with priority given to brownfield sites)? If so, has this change resulted in an unsustainable strategy?
 7. In Proposed Changes to the ACS [CD/REG/03], a strategic location for mixed use development at Toton in the vicinity of the proposed HS2 station is added to Policy 2. Is this justified with reference to factors other than the proposed HS2 station? The Transport Background Paper Addendum [CD/BACK/06] refers to a planning application for some 695 new homes. Is there scope for providing more detail in the ACS as to the likely scale and timing of development?
 8. Do the table in Policy 2, new paragraph 3.2.8a and footnote 31 on Page 52 of the modified plan [CD/REG/03], imply a shortfall against housing requirements in the five year supply of specific, deliverable housing sites? If so, how can this be remedied; do results from the 2013 Strategic Housing Land Availability Assessment (SHLAA) help?
 9. What should be the appropriate buffer, based on the NPPF's thresholds and past housing delivery for the three authorities?

10. Do the housing trajectory and schedule of strategic sites in Appendices C and A demonstrate that there is an adequate supply of specific, developable sites or broad locations for growth for the years 6-10 and 11-15?
11. Are the sites listed in Policy 2 capable of delivering the required housing within the plan period, given that paragraph 3.2.13 suggests several of them were identified in earlier Local Plans and some representatives question the ability to deliver brownfield sites?
12. Are the allowances for windfall sites reasonable and justified?
13. Is the ACS sufficiently flexible overall allowing some headroom for the currently unpredictable delay or non-delivery of some sites?

Affordable housing, housing for students, travellers and elderly people

14. The background evidence confirms the table in paragraph 3.8.11 of the ACS and shows that there is a very high level of need for affordable housing across the Authorities. Is there any substantive evidence to suggest otherwise?
15. Policy 8(5-7) sets out percentage targets for affordable housing in each authority and then implies that they could be varied in separate Local Development Documents. Are the targets based on up-to-date evidence of viability³? And does the approach of deferring details and delivery mechanisms to future LDDs provide sufficient certainty for developers; is it justified and consistent with the NPPF, paragraphs 173-4?
16. The NPPF expects the rate of delivery for affordable housing to be illustrated through a housing trajectory – has this been done?
17. Are the doubts expressed about the delivery of affordable housing, based on past completions and the status of the Homes & Communities Agency, justified?
18. Are Policy 8 and paragraph 3.8.16 consistent with paragraph 54 of the NPPF on providing rural affordable housing?
19. Does the ACS plan appropriately for student accommodation? CD/BACK/01 stated that it is not possible to project the number of students or number of new student flats to 2028. Could Policy 8 (4e)) and paragraph 3.8.8 result in an unjustified reduction in student accommodation?
20. Is Policy 9 consistent with DCLG's Planning Policy for Traveller Sites March 2012? Paragraph 3.9.2 and the table in the ACS suggest

³ Blyth Valley BC v Persimmon Homes (North East) Limited, Barratt Homes Limited & Millhouse Developments Limited, High Court 2008, confirmed the critical need for viability evidence to underpin affordable housing targets.

that the data is historical (for 2007-11) and that Policy B paragraph 9 of the DCLG document has not been met.

21. Since the allocation of sites is deferred to other unspecified DPDs, and some representors have queried the provision of traveller sites on the proposed sustainable urban extensions, how effective is Policy 9 likely to be?
22. Is a separate policy in addition to Policies 8 and 10 justified to promote care homes and accommodation for elderly people?

Sites and Settlements for new housing development

23. Are the sites named in Policy 2 (and see Appendix A for Strategic Sites Schedules and Plans) the best options for growth? Have they been selected following objective assessments of all reasonable alternatives through sustainability appraisal [see CD/REG/06]? If not, where specifically did the process fail?
24. If you consider that Policy 2 does not identify appropriate key sites, which are the unsuitable ones and why?
25. If you consider that the sites should be replaced with other sites or that additional sites should be included in the policy, have those (new) sites been subject to sustainability appraisal? What did the appraisal conclude? And, has public consultation been carried out for those sites?

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