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

## Matter 7: Infrastructure and Delivery (Policies 1, 2, 10, 18, 19)

Main issues: (i) Whether the spatial strategy is capable of being delivered given the infrastructure, community facilities and services, and standards for development which are required to support it; (ii) Whether sufficient attention has been given to viability and funding in line with national policy bearing in mind the likely cumulative impact of the above requirements including affordable housing on developments; (iii) whether the monitoring arrangements are fit for purpose, giving clear targets, measurable indicators, and an indication as to when review or intervention will take place because policies are not delivering.

## **Questions:**

- 1. Does Policy 18 satisfactorily reflect the introduction into national policy of the Community Infrastructure Levy and the three tests for planning obligations set out in CIL Regulations and the NPPF, paragraph 204.
- 2. The Infrastructure Delivery Plan (IDP) was updated in May 2013 [CD/KEY/01]. It refers to related policy, investment programmes and strategies, to joint working arrangements, and considers a range of infrastructure. It reflects the strategic and non-strategic sites in the ACS (Tables 4.2, 4.3 and 4.4) and details stakeholder engagement and consultation (App A) before dealing with each main infrastructure topic area. Does the IDP provide a sound base for the ACS and is it consistent with the NPPF's paragraph 177? If not, what are its shortcomings?
- 3. Section 8 of the IDP presents a Strategic Site Schedule similar to Appendix A in the ACS. Should Appendix A be amended to include this more up-to-date information?
- 4. Should more detailed and specific information on critical infrastructure and costs be added to Appendix B of the ACS, especially in respect of education and open space, to assist implementation?
- 5. Section 9 and Appendix B of the IDP report on viability testing to appraise the deliverability of strategic sites. Bearing in mind that these are broad-based assessments, do the results for Field Farm, Top Wighay Farm and North of Papplewick Lane provide credible evidence that the ACS meets the requirements of the NPPF, paragraphs 173 and 174, and is deliverable? Has the cumulative impact of all local policy and standards and infrastructure requirements been taken into account?
- 6. Table 9.1 provides results for Field Farm based on scenarios of achieving 15%, 20% or 25% affordable housing, but Broxtowe BC is aiming to achieve 30% affordable housing through Policy 6. Why have lower affordable housing percentages been tested; does this conflict with Policy 6 and suggest inconsistency with the NPPF?
- 7. The Severn Trent/ Boots scheme is described under smaller sites in the IDP. Have any of the other sites in Nottingham City, notably the regeneration zones such as Waterside where it is planned to build 3,000 new homes without Enterprise Zone status, been

- appraised? Would it be possible to seek 20% affordable housing there in line with Policy 6, as well as achieve the necessary abnormal costs for site remediation?
- 8. Are the monitoring arrangements sufficiently specific? Are the targets and indicators 'smart'<sup>1</sup>? Should the ACS provide more information as to when a departure from targets would lead to intervention or plan review?

Jill Kingaby Inspector

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<sup>&</sup>lt;sup>1</sup> Specific, Measurable, Achievable, Realistic and Time-based