Nottingham City

land and planning policies

Development Plan Document

Sustainable, Inclusive and Mixed Communities
Background Paper
September 2013
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1. **Introduction**

1.1 The purpose of this paper is to provide background information for the housing policies contained within the Land and Planning Policies (LAPP) Development Plan Document (Preferred Option stage).

1.2 This paper looks at both the national and local policy context for housing within Nottingham. It analyses the requirements of the National Planning Policy Framework (NPPF), the housing requirements set out in the emerging Core Strategy and other local documents such as the Housing Nottingham Plan 2013-15. It also examines the need and demand for different types of housing within the City.

1.3 The housing policies in the LAPP cover the following areas:

- Housing Mix;
- Protecting C3 dwellinghouses suitable for family occupation;
- Affordable Housing;
- Specialist Housing;
- Locations for Purpose Built Student Accommodation; and,
- Houses in Multiple Occupation (HMOs) and Purpose Built Student Accommodation.

2. **Delivering housing requirements**

2.1 The strategic policy context for the LAPP document’s housing policies is set out in the emerging Core Strategy, which has been produced jointly by the City Council and Broxtowe and Gedling Borough Councils, and in close co-operation with Erewash and Rushcliffe Borough Councils. Together these councils form the Nottingham Core Housing Market Area, as defined in the East Midlands Regional Plan using 2001 Census migration and travel-to-work data.

2.2 It is intended that the emerging Core Strategy will be adopted in winter 2013/14. At the time of writing, the latest version is the Publication Version (as approved by the City Council on 11th February 2013). The relevant policies are summarised below.

2.3 Also of relevance is the Housing Nottingham Plan, the housing strategy of the Nottingham Housing Strategic Partnership for 2013 to 2015. The LAPP reflects the priorities of this plan in spatial planning policies.

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The amount of new housing to be provided

2.4 Policy 2.3 of the emerging Core Strategy says that a minimum of 17,150 new homes will be provided in the City between 2011 and 2028. This figure is based upon the East Midlands Regional Plan, which was revoked on 12th April 2013, the latest available demographic data and the capacity of the City to accommodate more housing. Details of its derivation can be found in the emerging Core Strategy Housing Background Paper (June 2012)\(^3\) and the Addendum\(^4\) to it.

2.5 The provision to 2028 is distributed as follows:

<table>
<thead>
<tr>
<th>Year</th>
<th>Homes</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011/13</td>
<td>950</td>
</tr>
<tr>
<td>2013/18</td>
<td>4,400</td>
</tr>
<tr>
<td>2018/23</td>
<td>5,950</td>
</tr>
<tr>
<td>2023/28</td>
<td>5,850</td>
</tr>
</tbody>
</table>

2.6 The figures in this table are not upper limits to development, they represent the anticipated rate of housing completions, and will be used by the Councils to determine the level of their 5 year supply of deliverable housing sites\(^5\).

2.7 Three strategic housing sites (more than 500 dwellings) are designated in the City:

- The Boots site, which also extends into Broxtowe Borough (600 homes in the City part);
- Stanton Tip, Hempshill Vale (500 homes); and,
- Waterside Regeneration Zone (3,000 homes).

2.8 All three sites have the status of ‘strategic locations’ and are expected to deliver housing after five years from adoption. The Boots site is a ‘strategic location’ for housing purposes, but is capable of delivering economic development in the first 5 years from adoption, based on the existing infrastructure of the site.

2.9 Appendix 3 of the emerging Core Strategy contains a trajectory indicating how much housing is expected to be delivered from different sources in each year to 2028. This is based upon an update of the Strategic Housing Land Availability Assessment (SHLAA) to 31st March 2012. The SHLAA identifies all sites which are currently known about which are expected to be developed up to 2028. The sites which it contains, together with an indication of whether they are expected to be developed by 2018 or afterwards, are listed in the 2012 Housing Land

\(^3\) See [http://nottinghamcity.gov.uk/CHttpHandler.ashx?id=36318&p=0](http://nottinghamcity.gov.uk/CHttpHandler.ashx?id=36318&p=0)

\(^4\) To be published shortly.

\(^5\) As required by the National Planning Policy Framework (February 2012).
Availability Report (February 2013)\(^6\) In total, this shows that suitable sites are available for about 16,350 dwellings (homes) between 2012 and 2028\(^7\). An additional 1,700 dwellings are expected to be built on “windfall sites”, the location of which is not yet known. The proposed LAPP Preferred Option housing sites are included in these figures. More details about each site can be found in the 2013 SHLAA report\(^9\).

2.10 Some 1,350 demolitions are expected in the same period, which means that the net increase in homes between 2012 and 2028 is anticipated to be about 16,700.

The size, mix and choice of new housing

2.11 Policy 8 of the emerging Core Strategy contains policies relating to the size, mix and choice of housing. The relevant parts of this policy are as follows:

1. Residential development should maintain, provide and contribute to a mix of housing tenures, types and sizes in order to create sustainable, inclusive and mixed communities. All residential developments should contain adequate internal living space, and a proportion of homes should be capable of being adapted to suit the lifetime of its occupants, as defined by other Local Development Documents.

2. Within Nottingham City there should be an emphasis on providing family housing, including larger family housing, to meet Sustainable Community Strategy and Housing Strategy objectives. 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.

3. Throughout the plan area, consideration should be given to the needs and demands of the elderly as part of overall housing mix, in particular in areas where there is a significant degree of under occupation and an ageing population.

4. The appropriate mix of house size, type, tenure and density within housing development will be informed by:

   a) evidence contained within Strategic Housing Market Assessments and other research into particular housing requirements;

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\(^6\) Available shortly.
\(^7\) Note that all of the figures quoted here include purpose-built student flats.
\(^8\) After allowing for an anticipated 1,330 demolitions and completions in 2011/12, this amounts to about X% of the Core Strategy’s 2011/18 housing requirement
\(^9\) http://www.nottinghamcity.gov.uk/SHLAA
b) the Councils’ Sustainable Community Strategies and Housing Strategies;

c) local demographic context and trends;

d) local evidence of housing need and demand;

e) the need to redress the housing mix within areas of concentration of student households and Houses in Multiple Occupation;

f) area character, site specific issues and design considerations; and,

g) the existing or proposed accessibility of a location by walking, cycling and public transport.

Approach to Affordable Housing

5. Affordable housing will be required in new residential developments on appropriate sites. The following percentage targets will be sought through negotiation:

Nottingham City: 20%

6. Any locational variation in affordable housing requirements, and the mix and threshold for affordable housing will be will be set out in a separate Local Development Document by each Council, determined by:

a) evidence of housing need, including where appropriate housing tenure, property type and size;

b) the existing tenure mix in the local area;

c) the ability to deliver affordable housing alongside other requirements, taking into account broad assessments of viability. Where the findings of local assessments are disputed on a particular site, a financial appraisal of the proposal will be expected in order to determine an appropriate level of affordable housing; and,

d) the availability of subsidy on a development to deliver affordable housing within weaker housing submarkets.

7. In the case of larger developments the level of affordable housing will be considered on a site by site basis taking into account localised information and set out in Local Development Documents. The type of affordable housing provision will be assessed throughout the lifetime of that development to ensure
the development is responsive to updated evidence of need.

3. Background to Housing and Households in Nottingham

3.1 Nottingham City forms part of the wider Nottingham Core Housing Market Area which includes the surrounding boroughs of Broxtowe, Gedling, Rushcliffe and the Derbyshire Borough of Erewash\(^\text{10}\). Over 40% of the total population of the Housing Market Area live within the City.

3.2 In terms of the demographics and housing make up of the City, Nottingham is typical of other large cities, but is very different from the wider Housing Market Area and the national picture – as demonstrated below.

**Overview of the general housing stock**

3.3 Just 15% of dwellings in the City are detached, compared to over 37% in the Nottingham Core Housing Market Area (excluding Nottingham) and 22% nationally. Conversely, the City has a much higher proportion of terraced housing (29% compared to 16% in the wider Housing Market Area) and twice the proportion of purpose built flats than the wider area (20% compared to 8%) (Source: 2011 Census). The difference in proportions of flats has been exacerbated by development in recent years, particularly in the City Centre. About 70% of all new dwellings built in the City between April 2002 and March 2012 were flats (including the conversion of existing buildings, but excluding purpose-built student flats).

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\(^{10}\)The definition of the housing market area used here is as in the East Midlands Regional Plan using migration and travel-to-work data from the 2001 Census. Note that, because whole districts were used for this analysis, the Hucknall part of Ashfield District is excluded, although it was included in the Nottingham part of the Three Cities Sub-region in the Plan.
Figure 1: Dwellings by type (2011 Census)

3.4 The City has a smaller proportion of large housing, suitable for families, compared to the wider Housing Market Area and nationally. The average number of bedrooms in City housing is 2.6, compared to 2.9 for the Greater Nottingham area, and 2.7 for England. (Source: 2011 Census). Just over half of houses and bungalows have three bedrooms or more, compared to 68% in the Housing Market Area, and 58% nationally. Just 4% of the City’s houses and bungalows have four bedrooms or more – compared to 14% and 11%. (Source: Valuation Office Agency). Only 24% of new dwellings built between April 2002 and March 2012 had three or more bedrooms (i.e. they were suitable for family occupation, according to the City Council definition in paragraph 3.20). So although the total stock of housing is increasing, the proportion of larger dwellings is actually falling.

3.5 The City has a higher proportion of households who have too few bedrooms for their needs – some 6% of households compared to just 2% in the wider area and 65% nationally. The difference is more pronounced when looking at households with too few rooms for their needs (13% compared to 4% and 9%) but this will be affected by the large numbers of students living in shared houses in the City. (Source: 2011 Census)

3.6 In terms of tenure, less than a half of households in the City own their own home, either outright or with a mortgage or loan, compared to nearly three quarters of households in the wider housing market area and nearly two thirds nationally. This is a decrease on the 2001 figure. There are twice the proportion of households renting in the City compared to the wider area - with 30% renting from the Local Authority

11 The ages of the household members and their relationships to each other are used to derive the number of rooms/bedrooms they require, based on a standard formula.
or other social landlord and 22% renting privately – compared to 11% and 12%. (Source: 2011 Census)

3.7 Average house prices are low in the City compared to Nottinghamshire and England and Wales overall. In November 2012, the average house price was just under £84,000, ranging from £59,900 for a terraced house, to £149,600 for a detached. In the same month, the average house price in Nottinghamshire was £119,400 (ranging from £69,000 for a terrace to £183,300 for a detached house), and the average in England and Wales was £161,500 (with a range between £122,100 to £253,500). (Source: Land Registry)

3.8 In January 2013, the City had at least 7,100 Houses in Multiple Occupation (HMOs), according to the official definition, of which 4,600 contain non-students. (Source: Nottingham City Council Environmental Health Team)

3.9 In October 2012, the City had 6,700 houses in the general housing stock which were exempt from council tax due to being occupied by students, of which 2,500 were HMOs. This does not include purpose built student accommodation. This figure has not changed significantly since 2009. (Source: Nottingham City Council, Council Tax records)

3.10 The City has just over 4,800 vacant properties in September 2012, of which just over 4,000 were not council owned and not second homes. This amounts to about 3.3% of the total housing stock (Source: Nottingham City Council, Council Tax records)

3.11 The current make up of housing stock in the City is unbalanced and there is a danger that new housing development will increase this imbalance rather than providing for a suitable mix of good quality homes in appropriate locations. This contributes to the loss of families, particularly to other parts of Nottingham Core Housing Market Area, which is discussed further below.

Analysis of households

3.12 The City has a higher proportion of single person households than the Nottingham Core Housing Market Area, and nationally – with 25% of households containing a single non-pensioner adult, compared to 16% and 18% respectively. This helps explain why the average household size is slightly lower than the national average – at 2.3 people per household. (Source: 2011 Census)

12 Note that these figures are for the House Price Index, which is has been devised by the Land Registry for comparing prices over time and for different areas. This is different from the actual average prices paid, which tend to be higher.

13 The occupation of a house or flat by more than 2 unrelated people, sharing facilities. The City Council’s information is incomplete for smaller HMOs, so this is a minimum figure.
3.13 Nottingham has a high proportion of younger adults – with 28% of people aged 18 to 29, compared to 14% in the wider Housing Market area, and 18% nationally. The average age of the City’s population is 34.8 - the fourth youngest outside London - and 50% of the population are aged 30 or under. The two universities remain the principal reason for the high proportion of young people with nearly 46,000 full time students aged 18 or over, an increase of nearly 20,000 people since 2001. These students make up 15.0% of the City’s population compared to 4.4% of the population nationally\(^\text{14}\). (Source: 2011 Census)

**Figure 2: Age structure of Nottingham City (bars) and England (lines)**

3.14 The City has a slightly lower proportion of families with dependent children, at 27% compared to 28% in the Nottingham Core Housing Market Area and 29% nationally - with no real change from 2001. (Source: 2011 Census)

3.15 Nottingham experiences a high degree of population churn, in part due to the large numbers of students. In the year to 30\(^\text{th}\) June 2011, 23,400 people (8% of the population) moved into the City from other parts of England and Wales and 24,100 moved out – a net loss of 700. The only age-group which the City gains, in net terms, from the rest of the country is 16 to 24. It loses all other age-groups.

3.16 Looking at these figures in more detail, the City lost 2,350 people in net terms to the other Nottingham Districts (Broxtowe, Erewash, Gedling and Rushcliffe) in 2010-11, with 4,490 people coming into the City and 6,840 people leaving. Of particular interest are the 550 children aged

\(^\text{14}\) Note this is all full-time students over the age of 18, not just those the two universities. Full-time university students comprise about 12% of the City’s population.
under 16 (net) who moved out of the City to these Districts. This is a continuing trend which has changed little for many years.

Future Need

3.17 The number of households in the City is projected to grow by 17,000 (12%) between 2011 and 2028. 84% of this increase is likely to be one person households – which are projected to grow by 14,000 (24%). The proportion of all households that contain one person in Nottingham is likely to increase by 4 percentage points to 48% by 2028. Nationally, the number of households is projected to grow by 21% between 2008 and 2028 with an even greater increase in one person households – rising 40%. The proportion of all households that contain one person is projected to increase by 6 percentage points to 40% by 2028. (Source: CLG 2008 based household projections)

3.18 Whilst households are projected to get smaller, and the population on average are getting older, a significant amount of family housing will not become available for new households as elderly residents choose to remain in existing houses for a variety of reasons. There must therefore also be provision of good quality smaller accommodation, attractive to such occupiers at locations throughout the City, to ensure as far as possible larger houses are available for family occupation, and to provide for the projected increase in smaller households.

3.19 The current Government’s programme of welfare reform, including changing the entitlement criteria for housing benefit, may result in changes to future housing requirements in the City. The Housing Nottingham Plan will monitor and respond to such changes.

3.20 With regard to mixed and balanced communities, the Housing Nottingham Plan states that:

- There is a continuing need to develop larger family housing in Nottingham as part of the wider mix and balance in order to provide a wider quality of and choice for citizens. The requirement for the continued supply of larger family housing was also recommended in the 2009 BME Housing Inquiry;  

- The lack of larger units means that the quality and choice of housing is not always available in Nottingham as citizens progress up the housing ladder causing them to look outside the Council’s administrative area to find a property of choice. The plan, therefore, seeks to secure more family housing and in particular more larger family homes; and,

- The following definitions will be used: Family housing is likely to be of no more than three storeys, have private enclosed gardens, and have three or more bedrooms, two at least of

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which are capable of double occupancy\textsuperscript{16}. Larger family housing will have four or more bedrooms in addition to the characteristics described for family housing.

4. **Student Housing**

4.1 The NPPF states that local planning authorities should deliver a wide choice of high quality homes, widen opportunities for homeownership and create sustainable, inclusive and mixed communities. The Spatial Objectives of the emerging Core Strategy includes delivery of a mix of high quality new housing in terms of type, size and tenure to the benefit of rebalancing of the existing housing mix, most notably in areas where neighbourhoods, such as Lenton for example, are dominated by student housing. Policy 8 reaffirms this spatial objective and places emphasis on providing family housing to meet the Sustainable Community Strategy and Housing Strategy objectives. It is acknowledged within the document that purpose built student accommodation is also an important part of the mix, and that further provision is planned.

4.2 The number of full-time students living in the City has increased considerably in recent years with the current number approximately 46,000, an increase of nearly 20,000 since 2001\textsuperscript{17}. These students make up 15.0\% of the City’s population compared to 4.4\% of the population nationally. The supply of purpose built accommodation has failed to keep up with the rising number of students and the process of change brought about by increased numbers of students living in private rented households has altered the residential profile of some neighbourhoods dramatically. This has led to communities becoming unbalanced.

4.3 The City Council has long been aware of concerns about the impact of student accommodation on the amenities of long-term and other residents in areas of significant student household concentration. These concerns have been expressed by Councillors, residents and residents’ action groups. Issues include problems of ‘low level’ anti-social behaviour (in particular noise nuisance); problems of litter, waste disposal, fly tipping etc; high levels of car ownership, but limited parking provision; a change from a mixed tenure and mixed population to an unusually high percentage of people from one age group and one household type compounding other issues by undermining the ‘natural forces’ of social control that exist in more balanced communities; high levels of residential turnover result in little long term commitment to the area and a declining community spirit. House prices in these areas tend to be higher than average too and whilst they have reduced slightly since 2008, this has not been sufficient to make local housing any more affordable.

\textsuperscript{16} As in the Land and Planning Policies Document.

\textsuperscript{17} Shared Housing Report 2013 (to be published shortly).
4.4 Policy ST1 of the adopted Nottingham Local Plan (2005) seeks to provide and maintain balanced communities within the City, noting that family housing is particularly important to sustain local communities and support local schools as centres of communities. This is an aim which reflects the aspirations of The Nottingham Plan\textsuperscript{18}. In addition, the Building Balanced Communities (BBC) Supplementary Planning Document (SPD)\textsuperscript{19} expands on Policies ST1 and H6 (student housing) and indicates that where student housing will prejudice the creation and maintenance of balanced communities (by leading to further over-concentrations of student households or increases in the problems associated with large numbers of students) there will be a presumption to refuse planning permission for further provision of student housing. The BBC SPD references that an area is in danger of becoming imbalanced if the percentage of student households exceeds 25% of the total number of households in that area.

4.5 Although there has been an expansion in purpose built student properties in the City over recent years to provide a total of over 15,800 ‘bedspaces’ (equating to nearly 4,000 ‘households’, using a rough figure of 4 bedrooms per household), there has not been sufficient new accommodation to significantly reduce the demand on private sector housing for use as student accommodation. In November 2012, 6,746 properties in the general housing stock were exempt from Council Tax due to being wholly occupied by students.

4.6 It is anticipated that there is likely to be a fall in the number of students over the coming years and when coupled with the provision of new purpose-built bedspaces (approximately 1,200 more bedspaces are expected to be delivered in 2013), this may well result in a decrease to the level of private sector housing occupied as student accommodation. However, it is considered that a number of major student developments, other than those currently planned, would be required to make up for the shortfall of recent years.

4.7 Emerging policy within the LAPP document will seek to protect and promote family homes, building upon the current threshold led approach within the BBC SPD to support the creation of sustainable, inclusive and mixed communities, encouraging purpose built student accommodation in appropriate and preferred locations. The LAPP introduces a new definition of the threshold of 10% HMOs in a local area, more than this is considered to be a ‘significant concentration’ which may undermine objectives to create or maintain sustainable, inclusive and mixed communities. The LAPP includes criteria to be applied to planning applications for HMOs in areas above and below this level of concentration.

\textsuperscript{18} See http://www.onenottingham.org.uk/CHttpHandler.ashx?id=13455&p=0
\textsuperscript{19} See http://www.nottinghaminsight.org.uk/d/95593
5. **Houses in Multiple Occupation**

5.1 For many years, small Houses in Multiple Occupation (HMO) were not recognised as a separate use class but rather such properties fell within the C3 Dwellinghouse category which permitted occupation of up to 6 unrelated residents sharing facilities (i.e. bathroom, kitchen etc). During this time, many traditional family homes in the City were freely converted to small scale student accommodation and shared households without the need for planning permission, such that HMO concentrations could develop unchecked, thereby undermining sustainable communities objectives. However, changes to national legislation saw the introduction of a new C4 HMO use class in 2010, applicable to residential properties occupied by between 3 and 6 unrelated people.

5.2 The City Council has since taken the opportunity provided by the C4 use class to have a tangible impact in this regard through the introduction of a citywide Article 4 direction in March 2012, meaning that planning permission is now required for a material change of use from a C3 Dwellinghouse to a C4 HMO. This enables the number, distribution and effects of small shared properties throughout the City to be managed through the planning process in order to avoid the development of further concentrations or exacerbation of existing over-concentration.

5.3 As noted earlier, the current make up of housing stock in the City is generally unbalanced, with a particular lack of dwellings suitable for family occupation and a narrowing or domination of particular household types in certain locations. Clearly there are common trends with those raised earlier under the student accommodation theme and the emerging policy within the LAPP document therefore follows a similar approach, seeking to protect and promote family homes, building upon the current threshold led approach within the BBC SPD to support the creation of sustainable, inclusive and mixed communities whilst delivering a balanced mix of high quality new housing in terms of type, size and tenure.

6. **Specialist Housing**

6.1 Nottingham is home to a diverse range of people with widely differing and changeable needs associated with age, health, disability and levels of vulnerability and the City Council has a responsibility to offer housing provision which is flexible and reflective of this.

6.2 The situation in Nottingham:

- Nottingham is a City with high levels of deprivation and compared to the national average;
• Nottingham has higher levels of adults with learning disabilities including those living in care, as opposed to those living independently;

• Nottingham also has a high number of citizens with a mental illness;

• A recent Disabled People’s Housing Needs Study estimated an increasing number of people with physical disabilities in the City who need homes and facilities to meet their needs. By 2015 it is estimated that 1,055 to 1,197 households in the City with a disabled member will be in unsuitable accommodation, with unmet needs, and will require measures to be able to remain in their home or move to a suitable property;

• Local demographics are changing with the population ageing and numbers of vulnerable people increasing;

• Reductions in the Supporting People element of the Local Authority Formula Grant have led to a reduction in the supported accommodation provision in the City and the loss of a number of services which support vulnerable people to live independently;

• Changes to government policy, particularly elements of the Welfare Reform Act and Localism Act impact on vulnerable people disproportionately;

• Homelessness in Nottingham is increasing, including growing presentations for assistance from young people and people with mental health issues, learning disabilities and physical disabilities;

• Prevention and early intervention are central to the Vulnerable Adults Action Plan for Nottingham City 2012-15, the Housing Nottingham Plan 2013-15 and Nottingham’s Homelessness Strategy. These documents set out a proactive approach which identify and target specialist housing provision to meet the needs of Nottingham’s vulnerable citizens.

6.3 The Policies in the LAPP are aimed at supporting these issues and setting the key considerations for determining planning applications relating to specialist housing.

6.4 Government guidance produced over recent years has emphasised the need for improving the offer of real housing choices to adults with learning disabilities, physical disabilities and older people to enable them to live full and active lives and retain independence. There is therefore a need to work with housing providers and other landlords to develop a range of sustainable housing options for Nottingham’s vulnerable adults.
6.5 Much of Nottingham’s social sheltered housing stock was built in the 1960s and 1970s and has now become unsuitable and unsustainable as accommodation for older citizens. Particularly impractical are first floor flats without lift access. In addition, demand for units is consistently in decline with many older people indicating a preference for the extra care ‘retirement village’ model of accommodation when they want or need to move out of their existing home. With much of the existing social sheltered housing stock no longer seeming fit for purpose for older people, the issue that the LAPP will be faced with over the plan period will be the utilisation of existing stock and the exploration of new purpose built development opportunities.

6.6 Nottingham’s aspiration for older people is for a home for life. Retirement housing offer needs to be flexible, sustainable and available in all tenures in order to suitably accommodate and equally as important to appeal to older people with a variety of needs and available resources. The LAPP will therefore specify that a proportion of homes should be to a Lifetime Homes Standard. This is a nationally recognised standard that seeks flexible, adaptable and accessible homes that can respond to changes in individual circumstances.

7. Affordable housing

National Policy Context

7.1 The National Planning Policy Framework states that where an affordable housing need has been identified, the local planning authority should set policies for meeting this need on site, unless off-site provision or a financial contribution can be robustly justified. Flexible policies are needed to take account of changing market conditions over time.

7.2 The national indicative minimum site size threshold of 15 dwellings was set out in PPS3 (revoked). This also stated that the local planning authority could set lower minimum thresholds where viable and practicable.

Local Policy Context

7.3 Policy 8 of the emerging Aligned Core Strategies (Submission Version) states that a 20% target for affordable housing will be sought through negotiation in the City. Any locational variation in affordable housing requirements, and the mix and threshold for affordable housing will be set out in a separate Local Development Document, determined by:

a) evidence of housing need, including where appropriate housing tenure, property type and size;

b) the existing tenure mix in the local area;

b) the ability to deliver affordable housing alongside other requirements, taking into account broad assessments of viability. Where the findings of local assessments are disputed on a particular site, a financial appraisal of the proposal will be expected in order to determine an appropriate level of affordable housing; and,

d) the availability of subsidy on a development to deliver affordable housing within weaker housing submarkets.

7.4 In the case of larger developments the level of affordable housing will be considered on a site by site basis taking into account localised information and set out in Local Development Documents. The type of affordable housing provision will be assessed throughout the lifetime of that development to ensure the development is responsive to updated evidence of need.

7.5 The adopted Nottingham Local Plan (2005)\(^2\) says that residential development, and conversions, above 1 hectare or 25 dwellings will require a proportion of affordable housing. Off-site provision contribution can be sought where on site provision is not desirable. The justification text states that 20\% of dwellings are expected to be affordable. This is a starting point for negotiation. The 20\% target is a result of the recognition of more fragile levels of development viability in the City (the 2009 SHMA recognised that the 20\% level of viability was not achievable throughout the whole City area), although in most cases the level has been met.

7.6 The Council’s Affordable Housing Policy and Developers Contributions Supplementary Planning Guidance (2006)\(^2\) sets out the Council’s criteria for the provision of affordable housing.

7.7 The Strategic Housing Market Assessment (SHMA, 2012 update)\(^2\) identifies an affordable housing need in the City of 289 dwellings (net) per annum.

**Emerging policy**

7.8 A City-wide consistent approach to affordable housing is preferred by the City Council in order to avoid distorting housing markets, and because in practice the level has proved viable throughout the City,

\(^1\) http://www.nottinghamcity.gov.uk/index.aspx?articleid=650
\(^2\) http://www.notttinghamcity.gov.uk/CHttpHandler.ashx?id=670&p=0
\(^3\) http://www.notttinghamcity.gov.uk/CHttpHandler.ashx?id=40329&p=0
however, the policy allows for flexibility where viability has proved to be an issue.

7.9 The emerging Local Plan policy tests a lower threshold, than the current adopted policy, of 15 dwellings or 0.5ha hectares. This means the requirement for 20% of dwellings to be affordable will required on more sites than previously.

8. Housing Design

8.1 The NPPF states that the Government attaches great importance to the design of the built environment, seeking to ensure that housing design is of high quality, sustainable and inclusive. Policy 8 of the emerging Core Strategy also reflects this, setting out a series of considerations.

8.2 Fundamentally, the quality of living environment plays a vital role in the success of housing, rather than solely being measured in terms of aesthetics or visual impact on the environment and surrounding area/townscape. The City Council seeks to ensure that satisfactory levels of amenity would be provided for existing and future occupants, including appropriate provision of both internal and external space. This will take into account issues such as relationship to neighbouring properties and uses, longer term flexibility, the need for bin and cycle storage, in addition to sufficient private outdoor space and parking requirements.

8.3 Housing should also be functional to meet occupier's needs, not just in the short term but also with a view to being adaptable to people's lifestyle changes, particularly as they grow older. Homes should be safe, inclusive and accessible to all occupants, from young families to older people and individuals with a temporary or permanent physical impairment.

8.4 There is range of best practice guidance and design standards that the City Council currently expects developments to comply with and this will continue in the emerging policy to ensure the delivery of high quality desirable accommodation for all citizens.

9. Gypsies and Travellers

9.1 The City Council worked with other local authorities in Nottinghamshire (with the exception of Bassetlaw) to commission a Gypsy and Traveller Accommodation Needs Assessment to 2011 (GTAA). The final report of this assessment was published in May 2007 and concluded that Nottingham City Council had a need to provide an additional 11 permanent pitches for Gypsies and Travellers up to 2011 (see GTAA pages 122-123).

9.2 Subsequently to the completion of this report, it emerged that an additional authorised Traveller site exists within the City boundary that
had planning permission and which was not accounted for in the GTAA. This site was located in the Colwick area of Nottingham and contained 5 pitches occupied by Travelling Show People. This existing site, and a further site granted planning permission subsequent to the study for 8 pitches on Cinderhill Road meet the GTAA identified need for Gypsy and Traveller accommodation to 2011.

9.3 As the pre-existing site in Colwick should have been included in the GTAA calculation, and due to the GTAA end-date of 2011, Nottingham City Council have recalculated the need for addition pitch provision using broadly the same assumptions as the GTAA and rolled it forward to 2017.

9.4 Rolling forward the GTAA to 2017 is intended as an interim measure prior to a more comprehensive review of the GTAA. The City Council is working with the other Councils across Nottinghamshire to develop a common methodology for the next round of GTAAs. It is anticipated that the results of this methodology will be available to inform the Publication Version of the LAPP, and will benefit from results of the 2011 Census which will give more up to date information on Gypsy and Traveller population, including cross tabulations from the Census, giving information on Gypsy and Travellers not living in caravans (living in the general housing stock).

9.5 The assumptions used the original GTAA and in rolling forward the GTAA include:

- A vacancy rate of 8% across all pitches to account for transfers between sites;
- That 4.5% of households on site accommodation will take up housing;
- That 12.2% of Households contain concealed households that require their own site provision;
- That 33% of those living in housing require site accommodation;
- That population growth of 2.1% of the total population is expected.

9.6 However the assumptions for Section K in the table below (need for accommodation from Gypsies and Travellers living in housing) have been revised as the GTAA assumed that 50% of Gypsies and Travellers lived in housing and that 50% of these wanted to live on site. There was no evidence base to support this in Nottingham. What is more, the result of this assumption was an ongoing spiral of expanding provision based on the principle that the more Gypsies and Travellers you have in an area the more pitches you will need to provide on an exponential basis. Nottingham City Council officers believe this assumption can not be sustained or justified and following recent Government guidance intend to use a figure based on historic planning applications.
A breakdown of the proposed retained and new assumptions for the calculation is given below.

### Current residential supply (2012)

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Current supply of authorised privately owned site pitches in local authority area</td>
<td>60</td>
</tr>
<tr>
<td>B Number of authorised pitches not available for letting (due to management problems, awaiting refurbishment etc)</td>
<td>0</td>
</tr>
<tr>
<td>C Number of Available Pitches (A-B)</td>
<td>60</td>
</tr>
<tr>
<td>D Number of existing pitches expected to become vacant and lettable through normal annual turnover (LA and privately owned)</td>
<td>5</td>
</tr>
<tr>
<td>E Number of households in site accommodation expressing a desire to live in housing</td>
<td>3</td>
</tr>
<tr>
<td>F Net Available Supply (D+E)</td>
<td>8</td>
</tr>
<tr>
<td>Number of households on unauthorised encampments</td>
<td>1</td>
</tr>
<tr>
<td>H Households on unauthorised developments for which planning permission is not expected</td>
<td>0</td>
</tr>
<tr>
<td>I Demand (G + H)</td>
<td>1</td>
</tr>
<tr>
<td>J Concealed households in the study area currently in need of accommodation</td>
<td>7</td>
</tr>
<tr>
<td>K Not on site but looking for site accommodation in the area.</td>
<td>2</td>
</tr>
<tr>
<td>M Additional household formation 2012-17</td>
<td>6</td>
</tr>
<tr>
<td>N Estimated need for additional permanent pitches 2012/17</td>
<td>16</td>
</tr>
<tr>
<td>O Pitches available from current and planned supply over 2012-2017</td>
<td>28</td>
</tr>
<tr>
<td>P Indicative need for additional permanent pitches 2012-2017</td>
<td>0</td>
</tr>
</tbody>
</table>

Please note that the figures in this table have been rounded up or down as appropriate. Calculations have used pre-rounded figures which in some cases may affect totals.

This assessment relates to the need for additional pitches arising from the assumed number of households in the local authority area. It may be appropriate in some cases for some or all of this need to be met at a county or regional level rather than at a district level.