

NOTTINGHAM CITY COUNCIL

**Housing Delivery Test Action Plan
And
Housing Implementation Strategy**

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1.0 Introduction

Overview

- 1.1 The 2012 National Planning Policy Framework (NPPF) requires local planning authorities to prepare a Housing Implementation Strategy (HIS) and the subsequent 2018 version of the NPPF requires authorities to prepare a Housing Delivery Test Action Plan (HAP). This document consequently sets out the Council's approach to managing the delivery of the housing provision contained within the Local Plan and complies with the requirements to prepare both a HIS and a HAP, as it considers both the risk to the delivery of the housing provision and describes the action that would be taken to ensure the Council continues to meet its housing targets in the Local Plan.
- 1.2 The HAP provides a broad overview of the policy background and briefly sets out the housing requirements for Nottingham City Council. It identifies the types of risk that could prevent or delay housing sites coming forward. This is supplemented by a summary of risks to the delivery of each housing and mixed use site allocation in the Site Delivery Schedule ([Site Delivery Schedule October 2018](#)) which will be regularly updated, and which also indicates what actions may be taken to mitigate the risk. In due course, this risk information will be recorded in the Council's Strategic Housing Land Availability database.
- 1.3 Housing land take up is monitored on an annual basis and the City Council takes a proactive approach to delivery as set out in this HAP. Actions will be kept under review and therefore this is a "living" document which will evolve as required in order to address any delivery issues.

Policy Background

- 1.4 The 2018 NPPF requires the Council to undertake a Housing Delivery Test. Paragraph 75 states:

"To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years."

- 1.5 The Housing Delivery Test (HDT) measures net additional dwellings provided in a local authority area against the homes required. The methodology for calculating the Housing Delivery Test measurement is set out in the Housing Delivery Test Measurement Rule Book¹. The consequences of failing the HDT are set out in the NPPF. These will apply until subsequent HDT results demonstrate that delivery exceeds the required rate in the following year. All local planning authorities with a

result of less than 95% have six months to prepare a HAP, which is defined as: “a document produced by the local planning authority to reflect challenges and identify actions to address under-delivery against the housing requirement in the area. The document’s purpose is to detail the reasons for under-delivery and the steps the authority intends to take in mitigation and drive up delivery in the area. A good HAP will identify ways to reduce the risk of further under-delivery and set out the case for measures to maintain or improve levels of delivery.”

- 1.6 Nottingham City Council currently passes the housing delivery test, with a rate of **125.5%** (for the period 2015 to 2018) however, it considers it beneficial to produce an HAP which it considers will aid monitoring and troubleshooting for the future and allow it to secure an appropriate level of house building over the plan period.

2.0 Housing Delivery Analysis

Housing Requirement and Current rate of Delivery

- 2.1 The Local Plan for Nottingham City comprises the Aligned Core Strategy (ACS) which forms part 1 of the Local Plan and the Land and Planning Policies (LAPP) Development Plan Document that is part 2.
- 2.2 The Local Plan runs from 2011 to 2028, and includes a minimum requirement of 17,150 net new homes (ie allowing for demolitions), for Nottingham City, for that period.
- 2.3 The Local Plan provision is not equal across all years, but is stepped, with housing completions increasing upwards through the Local Plan period.
- 2.4 The table below shows how Nottingham City is progressing against its housing completion targets on an annual basis. It shows that net housing completions have been above planned provision for five of the past eight years, and overall provision is ahead of that anticipated by the Local Plan.

	2011 to 2018	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015	2015 to 2016	2016 to 2017	2017 to 2018
Anticipated net completions, Nottingham Local Plan	5,350	475	475	880	880	880	880	880
Nottingham City actual net completions	6,020	422	799	463	1,022	947	974	1,393

- 2.5 Specifically, in terms of the Housing Delivery Test result, it can be seen that housing delivery is at 125.5% for the period 2015 to 2018.

	2015 to 2016	2016 to 2017	2017 to 2018	2015 to 2018
Anticipated net completions, Nottingham Local Plan	880	880	880	2,640
Nottingham City actual net completions	947	974	1,393	3,314
				125.5%

Five year supply of housing

- 2.6 The Core Strategy also sets out a methodology for assessing five year housing land supply for Nottingham. The document sets out the agreed methodology, which allocates any shortfall in housing over the remaining plan period in an approach known as the 'Liverpool approach'.

- 2.7 The current assessment covers the period from 1st April 2018 to 31st March 2023. It is therefore based on known completions data for the period to 31st March 2018.
- 2.8 The sites identified within the supply of deliverable and developable sites have been drawn from the Strategic Housing Land Availability Assessment (SHLAA).
- 2.9 The total number of dwellings on all deliverable and developable sites exceeds the number needed to meet the minimum new homes up to 2028.
- 2.10 The City Council's Interim Housing Land Availability Report as at 31st March 2018 (19 October 2018)¹ shows **7.34** years of deliverable housing sites using the 'Liverpool' approach and **7.78** years using the 'Sedgefield' approach. This is significantly higher than the requirement of 5.25 years (including a 5% buffer).

Current factors contributing to delivery

Joint working across the conurbation

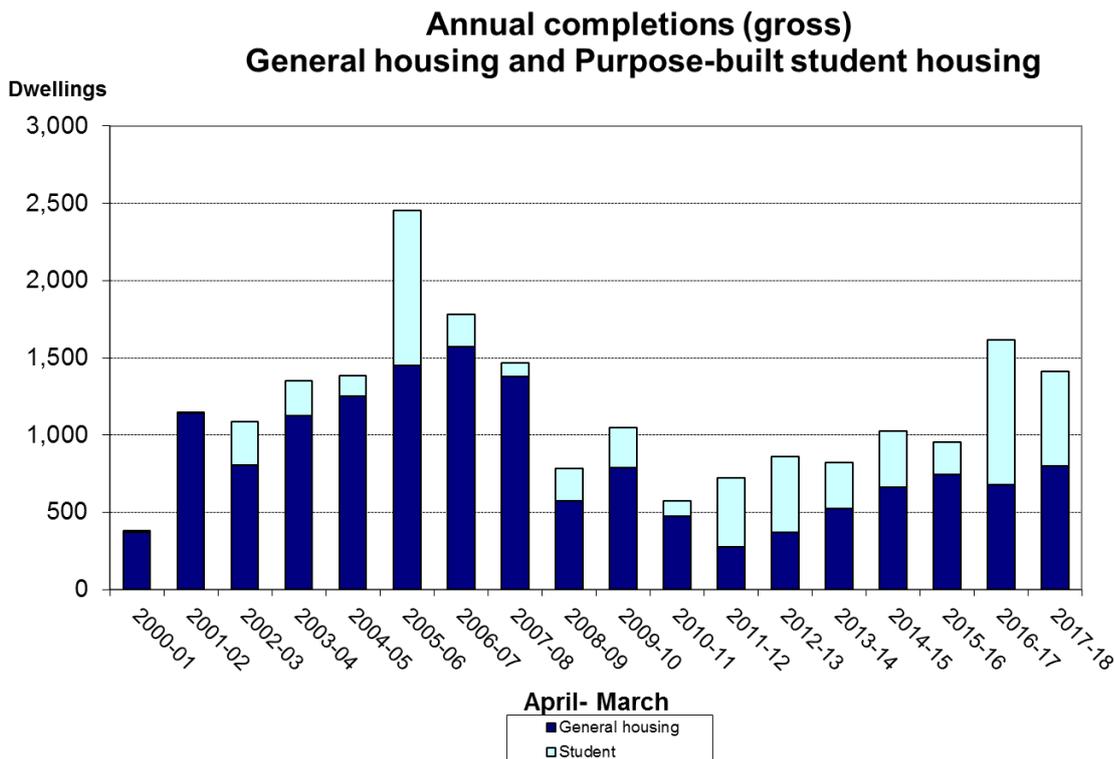
- 2.11 The Greater Nottingham Planning Partnership covers the Hucknall wards of Ashfield, and the administrative boundaries of Broxtowe, Erewash, Gedling, Nottingham and Rushcliffe Councils.
- 2.12 The partnership has a proven track record of collaboration in relation to planning and allocating housing; the six local authorities, along with the County Councils, have worked closely together and three of the authorities have fully aligned their Core Strategies. The Partnership has also jointly delivered capital projects excess of £10m and joint revenue projects of £1m. Whilst the work of the partnership is cross cutting, a key element is the delivery of housing to meet the needs of a growing population and to provide a range of housing choices to retain and attract a skilled workforce.
- 2.13 So far, the partners have provided a foundation for the delivery of 13,255 homes between 2011 and 2018 across Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe. The focus is now on furthering implementation and speeding delivery to maximise economic outputs.

High levels of student accommodation completions

- 2.14 There have been continuing high levels of student accommodation delivery over the last few years. Student accommodation accounted for 43.5% of completions 2017-18). 1,413 dwellings were recorded as being completed between April 2017 and March 2018, with purpose-built student flats contributed 615 dwellings towards this figure.

¹ <https://www.nottinghamcity.gov.uk/planning-and-building-control/planning-policy/the-local-plan-and-planning-policy/other-local-plan-related-documents/>

2.15 The high level of student accommodation completions is driven by the admission objectives of the two universities in Nottingham and also the City Council's policy response to this. The City Council aims to encourage the development of new purpose built student accommodation in order to offer a high quality alternative accommodation for students to residing in traditional housing stock in residential areas. Consequently, over the last few years the City has experienced a surge in new purpose built units, which have been very popular with students, and have not yet kept pace with demand. Currently there is a 0.5% vacancy rate in purpose built student units in the City, which indicates that there is still a need for further purpose built units in Nottingham.



2.16 There is as yet no evidence that interest in such schemes is diminishing and the City Council encourages them in appropriate buildings and locations. Both the Universities are understood to have plans to expand their student intake further over the coming years, and it is reasonable to assume that further schemes will come forward and be developed within the next five years.

Healthy supply, and successful delivery, of the Local Plan allocations

2.17 The ACS sets out the overall housing requirement for the City and allocates a number of strategic sites which will be developed. These strategic sites include:

- Remainder of Boots Site (up to 600 homes);
- Stanton Tip, Hempshill Vale (500 homes); and
- Waterside Regeneration Zone (3,000 homes).

- 2.18 In addition, the Land and Planning Policies Development Plan Document, (LAPP) includes non-strategic site allocations and contains detailed development management policies in order to deliver the remainder of the housing requirement.
- 2.19 The sites allocated in the LAPP could accommodate some 7,995 dwellings between 2018 and 2028. An additional 4,248 dwellings are predicted on other SHLAA sites, deliverable by 2028 and 1,785 dwellings are expected to be built on “windfall sites”, the location of which is not yet known. 300 demolitions are predicted between 2018 and 2028.
- 2.20 From 2011 to 2018 there has been provision above the Core Strategy minimum requirement of 670 dwellings, or 12.5%, for this period. The total potential housing delivery including Local Plan allocations is therefore 13,728 dwellings from 2018, this represents a potential provision above the Core Strategy minimum requirement of 2,598 or 23.3% of the remaining 11,130 homes. Therefore taking the plan period as a whole (2011-2028) there is the potential for 2,598 dwellings above the Core Strategy minimum requirement, or 15.1%, which is considered an appropriate buffer for non-delivery. If only the minimum predicted dwellings are developed on each Local Plan site during the plan period (ie 7,344) then there is the potential for 1,947 dwellings above the Core Strategy requirement, or 11.3%, which is also considered an appropriate buffer for non-delivery.

2011 – 18 Core Strategy Requirement	5,350
2018 – 28 Core Strategy Requirement	11,800
Total Core Strategy Requirement	17,150
Housing Delivery to 31st March 2018	6,020
Total remaining requirement 2018 – 28	11,130
Allocated in LAPP from 2018	7,995
SHLAA sites below 0.5 hectares 2018 – 28	4,248
Windfalls 2018 – 28	1,785
Demolitions 2018 – 28	- 300
Potential delivery 2018 – 28	13,728
Total potential delivery over plan period 2011 – 28	19,748

2.21 A key factor in the progress made towards the delivery of the City’s housing requirement is the availability of sites that are in public sector ownership (e.g. former education land, now surplus to requirements). These sites are usually more straightforward to develop in contrast to sites comprising former industrial land which are also present in the City and have already made a significant contribution to the completions total. City Council ownership gives a high degree of control over the timing of housing delivery on these sites and many are developed either by the City Council Arms Length Management Organisation (ALMO), Nottingham City Homes, or by its Development Company, Blueprint.

Significant level of windfall development and Prior Approvals

2.22 The NPPF (2012 version at paragraph 48 and 2018 version at paragraph 70) states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.

2.23 Because of the nature of sites in a large urban area (i.e. they were mainly formerly used for non-housing uses and may become available at short notice) Nottingham has a history of large numbers of windfall sites coming forward for development. Even with the introduction of SHLAAs, which are intended to list all sites which may be suitable for housing and are likely to be developed, and in a recovering housing market, they are continuing to come forward in significant numbers.

2.24 Recent data shows that windfalls not only continue to come forward, but the numbers have increased over the historic levels. Between April 2014 and March 2018, 341 sites totalling 2,779 dwellings were granted planning permission/prior approval (without having been included in the SHLAA (excluding garden sites, this figure includes dwellings where no planning application was required). The annual average over these four years is 85 sites and 695 dwellings granted planning permission.

Windfall Summary

Table: Windfall Sites and dwelling numbers granted permission by year

Year	Total planning permission/prior approval (Dwelling numbers)	Planning permission, if applicable. (Dwelling numbers)	Number of Planning Permitted Sites	Prior Approvals (Dwelling numbers)	Number of Prior Approval Sites
2014/15	1,006	407	95	599	13
2015/16	739	397	58	342	11
2016/17	604	566	50	38	6

2017/18	430	426	106	4	2
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- 2.25 The location of prior approvals, largely being existing office space, is difficult to predict, and as such many of these sites were not included in the SHLAA. It should be noted that many of the prior approvals are for large student housing schemes in the City Centre and these large student schemes have a good record of delivery. Even without prior approvals, the annual average rate of planning permissions is 449 dwellings per year, a significant increase over the 238 reported during the period April 2008 to March 2013.
- 2.26 The significant increase in approvals on non SHLAA sites demonstrates that windfalls will continue to contribute to both the five year and longer term housing supply.
- 2.27 In addition to the usual sources of windfalls such as conversion or redevelopment of offices and other non-residential buildings, sub division of large houses, vacant floorspace above shops and infill on areas of unused land, other factors such as an improving market and government changes to the planning system such as permitted development, should assist in bringing forward windfalls. The Core Strategy emphasis on urban concentration and regeneration should also help to sustain the number of windfall sites.
- 2.28 The table below shows completions on Windfall sites for the four years of the more recent data. Completions on windfall sites where planning permission was granted prior to 2014/15 are not included, due to changes in the way figures were reported. Therefore, for 2014/15, the figure of 80 completions are those that were granted planning permission/prior approval in 2014/15, ie they are "in year" windfall completions. As previously noted, it usually takes at least a year for a site to deliver homes following the grant of planning permission, so numbers increase in subsequent years.

Table: Completions on windfall sites by year (not including residential gardens)

Year	Cumulative planning permission/prior approval	Cumulative Windfall Completions	Annual windfall completions
2014/15	1,006	80	80
2015/16	1,745	381	301
2016/17	2,349	763	382
2017/18	2,779	1,343	580

2.29 Of the 2,779 dwellings granted planning permission on non SHLAA sites between 2014/15 to 2017/18, 1,343 (net) have been completed. Of these 548 were prior approvals and 675 were student housing.

2.30 For the four years, the average level of completions on windfall sites is 336 per year. Taking into account the fact that completions on windfall sites granted planning permission prior to 2014/15 are not included, the actual average is likely to be higher.

Social and Affordable Housing Delivery

2.31 Nottingham City Homes ALMO and the City Council are leading the biggest new council housing building programme in recent years.

Council House Building Programme

Nottingham City Council and Nottingham City Homes Arms Length Management Organisation (ALMO) are leading the biggest new council house building programme in a generation. Between 2013/14 and 2019/20, the partnership will have built 623 council houses with further developments in the pipeline. Consequently, Nottingham City Homes is the top social housing builder in the UK and was responsible for over a quarter of new council houses built in 2017. Of the 775 homes built by all ALMOs last year, Nottingham City Homes (NCH) delivered 185, on behalf of the City Council. In its summary of NCH, the publication highlighted the City Council being awarded strategic local authority of the year at the 2017 UK Housing Awards.

Furthermore, Nottingham City Homes was named by Inside Housing as the number one ALMO builder in the UK, building twice as many homes as any other ALMO.

Innovative approach to delivery

2.32 Housing is very much a corporate priority for the City Council. The City Council takes proactive action where needed and there are many examples where it has adopted an ambitious and creative approach to delivering sites. There is a strong desire to encourage new products on the market and the private rented sector seems to be gaining strength.

2.33 Frequently the Council has delivered new homes on highly constrained sites, with significant abnormal costs. These are often sites which would not be viable for commercial developers. The new build programme contains a mixture of sites, some of which are Estate Regeneration type projects, and more simple developments. The Council consistently delivers high quality new homes to good design and space standards.

Waterside Regeneration

It had been the Council's aspiration to regenerate the Waterside for 20 years but the area struggled to come forward. In 2015, the Council decided to take a more direct approach to development and bought Homes England's land holdings at Trent Basin and a 50% share of the development company Blueprint. In doing so the Council secured a significant portion of land and the means to develop high quality homes. The successful development of Trent Basin Phase 1 has given confidence to other landowners and developers to bring forward their sites for development. Development by these parties has now commenced at PA85 Park Yacht Club and will shortly begin at PA81 Meadow Lane.

The SHLAA

2.34 The Nottingham City Strategic Housing Land Availability Assessment (SHLAA) has been a key source in identifying development sites. The SHLAA database includes:

- Sites in the planning system;
- Strategic sites in the ACS;
- Site allocations in the publication draft Local Plan;
- Sites with planning permission.
- Sites not in the planning system
- Sites below the threshold for allocation in the LPD but without planning permission.

2.35 The SHLAA is updated on an annual basis and provides valuable intelligence to; track progress on existing sites, identify new sites to meet the City Council's housing requirement, and make the annual assessment of the five year housing supply.

2.36 The SHLAA database has just undergone a fundamental redesign which will put the City Council in good stead for recording and tracking development over future years.

2.37 The SHLAA informs the preparation of Nottingham City Council's Housing Land Availability Report (HLAR). It includes a Schedule of Deliverable Sites (i.e. sites which are available now, offer a suitable location for development now, and are considered achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable). It also contains a Schedule of Developable Sites (i.e. sites which are in a suitable location for housing development and with a reasonable prospect that the site is available and could be viably developed at the point envisaged).

2.38 In the future, it will also include risks to housing delivery and actions to mitigate those risks.2.38

3.0 Risks to Future Delivery

- 3.1 It is anticipated that housing delivery will continue at a consistent rate over the next few years. Whilst a Housing Delivery Test Action Plan is not required until delivery has fallen below 95% of the housing requirement (over the previous three years), the City Council is keen to ensure that the level of delivery is maintained at the current high level, and that factors, which could pose a threat to delivery are tackled in a timely and pro-active matter before they manifest.
- 3.2 Potential risks to the delivery of future housing development have been identified via the Root Cause Analysis process. These potential risks can be categorised as follows:
- Economic climate, housing market and viability;
 - Supply of deliverable/developable land;
 - Planning status and unimplemented planning permissions;
 - Site fragmentation and ownership;
 - General constraints;
 - Infrastructure provision; and
 - Access to funding

Economic Climate, Housing Market and Viability

- 3.3 Whilst Nottingham is not reliant on large sites/urban extensions for boosting housing delivery, the City has the challenge of bringing forward brownfield sites that can take longer and be more expensive to deliver, and which have viability issues. Viability is a key factor affecting housing delivery.
- 3.4 A Plan Wide Viability Study 2018 has been prepared in order to appraise the viability of the Local Plan Part 2 in terms of the impact of its policies on the economic viability of the housing development expected to be delivered during the Plan period to 2028. The study considers policies that might affect the cost and value of housing development (e.g. affordable housing, open space, and design and construction standards).
- 3.5 The study is a strategic assessment of whole plan viability and as such is not intended to represent a detailed viability assessment of every individual site. It applies the general assumptions in terms of affordable housing, planning policy costs impacts and identified site mitigation factors based on generic allowances. More detailed mitigation cost and viability information may be required at planning application stage to determine the appropriate level of affordable housing and planning obligation contributions where viability issues can be substantiated. The purpose of the study was to determine whether the overall development strategy proposed by the Plan is deliverable given the policy cost impacts of the Plan.
- 3.6 The assessment of all proposed residential sites in Nottingham was undertaken with due regard to the requirements of the NPPF and the best practice advice contained in the Viability Planning Practice Guidance July 2018. The study demonstrates that the majority of the housing development proposed by the Local Plan is viable and deliverable taking account of the cost impacts of the policies proposed by the plan and the requirements for viability assessment set out in the NPPF. The Study

concludes that the viability of both apartment development and brownfield housing in the lower value sub-market area is challenging under current market circumstances and some short term flexibility in relation to Affordable Housing and infrastructure contributions may need to be considered at application stage for these forms of development to be delivered.

- 3.7 The summary results of the Plan Wide Viability site appraisals are provided at Appendix 1.
- 3.8 In addition to considering viability factors, it is also necessary to consider changes to the housing market in terms of the type of product that will be delivered in the future. Currently student housing is being successfully delivered in high volumes, in accordance with the expansion policies of the City's two universities, and the City Council's policy response to this, which is aimed at increasing the supply of purpose built student accommodation. It is acknowledged that, in the future, the growth in student numbers attending the two universities may stabilise and the supply of new student accommodation may also start to slow as a consequence. The actions of the HAP (in the next Section) are therefore very much focused on progressing non-student sites and ensuring that delivery rates can continue at the same current rates.

Supply of deliverable/developable land

- 3.9 The latest HLAR report demonstrates that developable sites as at 31st March 2018 could accommodate 3,391 dwellings (2,945 dwellings to 2028) (see Appendix B) after 2023. The requirement of the NPPF is to identify sites for years 6 to 10 and, if possible, years 11 to 15. Including dwellings on deliverable sites which are anticipated to continue to deliver housing after 2023 (1,005), sites have been identified for 4,383 dwellings (3,950 dwellings to 2028).
- 3.10 Additionally, after 2023 there are a predicted 1,250 windfalls and only 150 demolitions so that the total expected net completions is 5,050 to 2028. This compares with 5,850 required by the Aligned Core Strategy between 2023 and 2028
- 3.11 However, the trajectory anticipates that by 31st March 2023 housing completions will be 3,398 dwellings above the cumulative housing target of 11,300, so the requirement between 2023 and 2028 is only 2,452 dwellings. This means that the requirement with regard to years 6 to 10 has been met and the years to the end of the Plan period also identified.
- 3.12 In terms of overall housing land supply therefore, risks to delivery could arise if the allocated sites for whatever reason did not come forward quickly enough. In this context the SHLAA identifies a number of sites that are under the threshold for allocation but which are suitable and deliverable. These tend to be small brownfield sites and evidence indicates that these have contributed significantly to Nottingham's housing supply in the past. For example, excluding student completions, between 2011 and 2016, 900 homes were built on small sites below 10 dwellings, some 34.9% of all completions over the period (out of a total of 2,582 completed homes). In addition the SHLAA identifies other larger sites as potentially suitable should allocations not come forward quickly enough.

- 3.13 Furthermore, sites not currently considered deliverable over the plan period represent a pool of sites that will be re-visited in order to assess if circumstances have changed and allocated subject to an early review of the LAPP.
- 3.14 The HLAR sets out a schedule of sites which are considered to be deliverable within the period from 1st April 2018 to 31st March 2023 and it also contains a list of developable sites in the SHLAA, i.e. those where it is unlikely that housing will be delivered by 2023 but there is a reasonable prospect of their doing so by the end of the ACS period (2028). Further details of remaining sites can be found in the SHLAA report².

Planning status and unimplemented planning permissions

- 3.15 Sites without planning permission obviously carry a higher degree of risk than those with planning permission but some sites can stall once planning permission has been granted. The SHLAA identifies broad constraints in relation to site delivery; however, ultimately the planning application process will provide a detailed consideration of individual issues.
- 3.16 Unimplemented planning permissions could in the future pose a risk to overall delivery of the Local Plan provision. The contributing factors that result in this in Nottingham stem from the reasons detailed above and also include unrealistic expectations in land values and yields. Furthermore, there is often a disconnect in what some landowners expect to develop on sites and what planning policy permits.
- 3.17 In order to mitigate against the risk of unimplemented planning permissions the Council considers it important that there is a buffer in relation to housing delivery (i.e. an excess delivery of housing over the minimum requirement established) to allow flexibility should sites not come forward as anticipated.
- 3.18 In addition, in order to be proactive in this regard, the City Council's Regeneration and Planning Teams have begun monitoring unimplemented planning permissions to investigate underlying causes and implement swift action to progress some of these sites.

Site fragmentation and ownership

- 3.19 Risks can potentially arise where there is more than one landowner or where landowners are not working, or stop working, in a coordinated manner. Nottingham City Council can help to reduce this risk by establishing appropriate development partnerships to facilitate joint working and cooperation between different land owners/developers and coordinate with service providers. The Waterside is a successful example of intervention taken by the City Council in this regard (see Section 2). The City Council will continue to follow this model in the future and work in partnership with other bodies. Where this approach fails and negotiation is not successful the City Council will consider Compulsory Purchase in line with Policy RE1 of the LAPP.

General constraints.

^{2 2} <https://www.nottinghamcity.gov.uk/planning-and-building-control/planning-policy/the-local-plan-and-planning-policy/other-local-plan-related-documents/>

- 3.20 General constraints are considered as part of the SHLAA assessment process and are used to inform conclusions in relation to site suitability and availability.
- 3.21 The site selection process for the Local Plan Part 2 site allocations took into account the SHLAA assessment of potential constraints and none of the proposed site allocations have overriding constraints that could prevent them coming forward for development.
- 3.22 Where identified constraints are resolvable through mitigation, issues can still arise e.g. uncertainties about the timing or delivery of necessary infrastructure or because the exact nature and scale of mitigation may only become apparent at the planning application stage.
- 3.23 General constraints can include:
- **Contamination** issues due to historical industrial issues
 - **Flood risk** whereby some sites are within medium and high flood risk. These may require easement strips to safeguard access for maintenance and flood risk management work or raising land levels for example.
 - **Transport** whereby some sites may have access challenges or may not benefit from particularly strong public transport links.
 - **Topographical issues** whereby changes in land levels, for example, may complicate delivery.
- 3.24 Constraints pose a significant risk to delivery of sites and also to the timing of delivery. In order to address this any constraints, issues will be discussed at a pre-application stage with applicants, allowing for any necessary flexibility in terms of any requirements arising as result of Policy IN4 : Developer Contributions of the LAPP.

Infrastructure Provision

- 3.25 Delivery risks can arise due to the need to provide necessary infrastructure particularly in relation to costs if they are higher than anticipated or if there is uncertainty about when the infrastructure would be provided. Sites have been assessed to identify their infrastructure requirements. The Greater Nottingham Infrastructure Delivery Plan (GNIDP) prepared in support of the ACS and the Infrastructure Delivery Plan (IDP) prepared to support the LAPP, recognise that the level of growth must be supported by the necessary infrastructure. The IDP also identifies where significant new infrastructure is required including new primary schools and processes have been set up whereby the capacity of existing schools is monitored with a view to obtaining necessary developer contributions should new provision be required as a result of the development This is to ensure that developers understand from the outset the infrastructure implications of their development and that they can be planned at an early stage. Existing and emerging Supplementary Planning Documents covering issues such as Affordable Housing and Open Space also provide further guidance in this respect.

Access to funding

- 3.26 Lack of funding is a potential risk to housing delivery in the future, both for the private sector, and local authority led schemes. Currently, Homes England (HE) funding has been secured and will accelerate housing delivery on several City Council sites; the Island Site, River Leen Sites and Waterside. The City Council will continue to work with HE to identify housing delivery schemes that meet their funding criteria and will also continue to work jointly with neighbouring authorities to bid for funding opportunities. Recently, the Joint Planning Advisory Board worked on a successful joint bid to accelerate housing delivery via the Homes England Capacity Fund which saw an award of £855,000.
- 3.27 The HRA borrowing cap has now been lifted for all Local Authorities. This means that the ambitious delivery programme for new Council housing can progress. The City Council is also funding new Council homes on smaller, less market facing sites.
- 3.28 Developers can struggle to obtain institutional funding. An example of this was seen on the Hicking Pentecost 3 site where finance was withdrawn for a professional PRS scheme, due to only providing 1 bathroom in 2 bedroom properties rather than the one bedroom per tenant requirement. With City Council support, a revised scheme was proposed which met the institutional requirements and this is now being developed. The City Council will continue to support developers and will assist with remodelling schemes where necessary, whilst maintaining quality, to access funding opportunities.

Competing housing objectives

- 3.29 Whilst national housing objectives are focussed on delivering housing numbers, typically at high densities, local housing objectives in Nottingham seek to balance this with the need to deliver larger family housing units. Consequently, the forthcoming Local Plan Part 2 contains a housing mix policy which applies a presumption in favour of family housing over smaller apartment schemes, outside of the City Centre. This approach may well have an impact on the number of units which are delivered in Nottingham in future years but this has been factored in to local plan assumptions and therefore this approach will not have an impact on the number of units that are required.

4.0 Key Actions & Responses

- 4.1 Nottingham City Council is a proactive, ambitious and outward facing organisation. Much progress has been made in terms of delivering our housing targets, and the intention is for this to continue and to work in new and innovative ways to stimulate housing growth. Key actions have been identified in Section 3 that will continue. There are also a range of other potential actions outlined below. which will ensure that the Council continues to meet housing targets.

Economic climate, housing market and viability

- 4.2 Offering more pre-application discussions to ensure issues are identified early. It may well be necessary to adjust local charging regimes, the 2018 Viability Study highlights that the viability of both apartment development and brownfield housing in the lower value submarket area is challenging under current market circumstances and some flexibility in relation to Affordable Housing and infrastructure contributions may need to be considered in the short term at application stage for these forms of development to be delivered. This will be done in line with Policy IN4 of the LAPP.
- 4.3 Place marketing and promotion has been useful to actively promote the area/specific areas to stimulate market interest. Nottingham City Council works with Marketing NG (Nottingham and Nottinghamshire) to promote specific large scale housing sites and opportunities at MIPIM and other national and international events. This could be targeted at different audiences, for example where there are limited active developers, a focus could be placed on house builders/investors, or where there is a need to stimulate market demand place based marketing could stimulate consumer demand.
- 4.4 The City Council will continue to work with the private rented sector to deliver schemes. An example of where Nottingham City Council is addressing market failure is in the Private Rented Family Housing sector. Two Council owned sites, have been recently marketed, with the benefit of site investigations and informal planning guidance, towards PRS providers. Even though this is the fastest growing sector in the housing market, there have been no large scale family housing PRS schemes in Nottingham. The Council believes that this intervention will bring market confidence to a previously untested market, and stimulate further growth in this sector.

Supply of deliverable/developable land

- 4.5 More emphasis will be put on making the SHLAA dynamic and 'owned' by all relevant City Council teams in order to facilitate increased intelligence and prioritization of existing and new sites. It contains up to date information on all potential housing sites. The Council will also create a SHLAA public interface for all those interested in delivering housing in Nottingham.
- 4.6 The City Council will continue to rigorously monitor housing completions and facilitate delivery of SHLAA sites. The SHLAA identifies a number of sites that are under the threshold for allocation but which are suitable and deliverable. These tend to be small brownfield sites and evidence indicates that these have contributed

significantly to Nottingham's housing supply in the past. A project team will be pulled together to examine ways to accelerate housing delivery and raise awareness of these potential development sites- both with land owners and developers. The Council will also examine a programme of disposal of NCC owned sites whereby sites are parcelled together to sell to one developer. In addition, sites not currently considered deliverable over the plan period represent a pool of sites will be re-visited in order to assess if circumstances have changed and allocated subject to an early review of the Local Plan.

- 4.7 The SHLAA will be reviewed regularly in order to identify sites or broad areas which may be suitable for housing development, available and achievable, including public sector land and brownfield land. It may, for example be prudent to look at HRA amenity land, which can comprise large parcels of land in many instances. Carrying out a regular Call for Sites will therefore be vital.
- 4.8 Progressing Planning in Principle (PiP) on priority regeneration sites through the Brownfield Land Register will also to be explored. The first developer led PiP application has recently been submitted and the use of this, and whether it results in housing delivery, will need to be monitored. The approach will be further scrutinised with a view to looking at ways to stimulate market interest.
- 4.9 Nottingham has a limited supply of large scale housing sites, therefore many sites are not attractive to large PLC developers. The City Council will have to be creative around packaging of sites, site assembly and ways to attract more small to medium size builders and developers to Nottingham, this may include self-build schemes. A project is currently being undertaken with the aim of disposing of some LA owned sites that could accommodate 1-4 homes. These will be marketed towards individuals registered on the self-build register.
- 4.10 The City Council will continue to keep the Local Plan under review to address any issues which are resulting in barriers to development and ensure that policies pro-actively address under-delivery.
- 4.11 The City Council will work with landowners and developers in the interest of bringing land forward for development but will consider using Compulsory Purchase in line with policy RE1 of the LAPP, only where negotiations are not successful.

Planning status and unimplemented planning permissions

- 4.12 Nottingham City Council has a Development Protocol³ to ensure efficiency in the planning application process. In addition, a Planning Protocol is currently being developed by the Greater Nottingham Joint Planning Advisory Board (JPAB). The protocol is intended to encourage continued collaborative working between all those involved in delivering sustainable growth in Greater Nottingham. As well as JPAB, this includes developers, infrastructure providers and government agencies such as the Environment Agency and Highways England, and other statutory consultees. All parties will be encouraged to sign up to the principles of this protocol, which is an advisory document to demonstrate their commitment to the sustainable development and growth of the area.

³ <https://www.nottinghamcity.gov.uk/planning-and-building-control/planning-for-developers-and-businesses/>

- 4.13 The City Council will continue to monitor unimplemented planning permissions to investigate underlying causes and implement necessary actions to progress these sites. This is current practice, via the existing officer 'housing action plan', however applications will be more frequently reviewed and a more proactive engagement approach taken. NCC will look to find ways of working with developers to tackle unimplemented planning permissions and challenge unrealistic expectations regarding land values and scheme composition. A developer forum will be reinstated to whereby broad principles and issues can be discussed; it will enable contact to be established with landowners, agents and developers on site specific issues.

Site fragmentation and ownership

- 4.14 Nottingham City Council can help to reduce the risk of site ownership fragmentation by establishing appropriate development partnerships to facilitate joint working and cooperation between different land owners/developers and coordinate with service providers. The City Council is proactive in promoting collaboration agreements and brokering cross working between land owners, as demonstrated by the approach taken at the PA83 Trent Basin development, and is underway at the PA14 Chronos Richardson site.
- 4.15 Establishing relationships and working in partnership with developers especially for key site clusters. This could involve the formation of a development team to include key service and infrastructure providers as well as developers and the necessary specialist expertise;
- 4.16 A proactive approach will be taken in regard to land assembly to address local difficulties in the land market, including possible use of compulsory purchase powers.

Tackling general constraints

- 4.17 The City Council will continue to engage regularly with key stakeholders to obtain up-to-date information on the build out of current sites, identify any barriers, and discuss how these can be addressed; this can be via the developer forum and also improving relationships with land owners and developers. On large sites opportunities will be taken to work with developers to see if there are any options to partner with other house builders to secure and accelerate housing delivery.
- 4.18 The City Council will continue to 'de-risk' council owned sites before they are taken to market by carrying out all necessary site investigation work and obtaining outline planning permission. This has been successful in the case of the former Denewood Centre in Bilborough which has recently been marketed and attracted a significant amount of market interest. This will be the approach on all City Council sites going forward. Sites will continue to be marketed with informal planning guidance to instil confidence in developers.
- 4.19 The City Council will continue to be flexible with regards to car parking provision in developments which intended to optimise the number of homes that can be delivered on sites. This will have a marked impact on some of the more constrained

or landlocked sites, particularly where viability is marginal. This approach will be balanced with general neighbourhood traffic management issues that a lack of parking can cause.

- 4.20 Masterplans and Development briefs for key sites will be prepared as necessary; and a City Council's Developers Forum will be re-established to meet regularly. This will be championed by the Development and Growth Department and comprise Members, senior officers and representatives. Such a Forum provides opportunities for ongoing discussion on planning and delivery issues.

Infrastructure provision

- 4.21 Where infrastructure delivery is holding up supply, the Council will identify funding opportunities, bid for monies, and/or evolve new local infrastructure funding mechanisms. A Homes England action plan is being developed to encourage more bespoke support around some of the Council's regeneration sites and assistance with infrastructure.

Facilitation of Kilpin Way

A main priority of the City Council is to enable the regeneration of the Waterside and accelerate housing delivery there. In order to do this the City Council successfully secured £1.25m of funding to deliver the infrastructure works, creating a spine road linking Trent Land to Poulton Drive, Sneinton. The provision of this road opens the site up to further development around the Trent Basin. This road will also serve a new primary school which is currently the subject of a free school bid.

Access to funding

- 4.22 The Council will explore how new delivery vehicles could drive delivery, for example it will consider housing development companies, joint ventures and statutory vehicles such as development corporations. The City Council currently has a Joint Venture (JV) Partner, Blueprint, which has successfully developed aspirational housing in regeneration areas which are up and coming/peripheral, and this approach is bringing confidence to private developers to areas which were previously overlooked in favour of more established sites. This is being seen in the Waterside and has had a significant impact in the Meadows area.
- 4.23 However, alternative JV models will be investigated which would focus on ways to stimulate development in lower value markets, which produce higher numbers of units.
- 4.24 Further consideration will be given to working at a Midlands Engine or Derby - Nottingham Metro Strategy area. The ambition would be to further boost the supply of housing, and to enhance the ability to bid for funding at a more strategic level.

The table below summarises the key actions, lead service and timescales for delivery.

Action	Who	When	Review
<u>Economic climate, housing market and viability</u>			
Extended Pre-app, review charging.	Chief Planner	April 2019	Annually
Review s106 contributions expectations	Chief Planner	April 2019	Annually
Place Marketing and promotion	Regeneration/ Marketing NG	Continuous	
	Regeneration	Continuous	
Continue to engage with PRS sector to get more investment into Nottingham			
<u>Supply of deliverable/developable land</u>			
Extended use of the SHLAA.	Planning Policy	February 2019	Ongoing
Promoting use of small but developable sites. Consider packaging of Sites and site assembly.	Regeneration	February 2019	February 2020
Review sites considered 'non deliverable' and re-assess	Planning Policy	Continuous	
Carry out regular call for sites	Planning Policy	Continuous	
Investigate the use of PiP and how this might instigate market interest in sites	Regeneration	January 2020	Ongoing
Disposal of small sites to self build register	Regeneration	January 2020	Ongoing
Revising policies to consider allocating sites for housing.	Planning Policy	Local Plan Review	
Utilise CPO powers more proactively.	Regeneration/ Planning Policy	Summer 2020	Ongoing as appropriate.
<u>Planning status and unimplemented planning permissions</u>			
Develop further Planning Protocols with developers.	Planning Policy	Continuous	
Applying a flexible approach to planning applications which seek to overcome barriers to delivery through early pre-application discussions.	Planning Policy/DM/Chief Planner	Continuous	

Monitoring and intervention on unimplemented planning permissions.

Site fragmentation and ownership

The City Council is proactive in facilitating joint working/collaboration Agreements on fragmented sites

Review possibility of key sites CPO

General constraints

Reinstate the developer forum and attempt to unblock sites

Continue to 'derisk' key sites, marketing with site investigations and outline planning permission

Flexibility around car parking provision, to optimise house numbers.

Infrastructure provision

Constantly review, and bid into, opportunities for funding.

Develop a Homes England Action Plan to encourage bespoke deal.

Access to funding

Explore potential for a housing development company/new mass market JV

Continue to push the market via Blueprint, in aspirational and Innovative housing offer.

Consider the role of further JVs to support housing delivery

Regeneration/ Development Management	January 2020	Bi- monthly
Regeneration/ Property	Ongoing	6 monthly to scope new opportuni- ties
Regeneration/ Property/ Planning Policy	January 2020	6 monthly
Regeneration/ Planning Policy?	June 2020	3 monthly
Regeneration/ Property	Ongoing	
Planning policy/ DM	Continuous	?
Regeneration	Ongoing	Ongoing
Regeneration	March 2020	
Regeneration	Mid 2020	Ongoing
Regeneration	Ongoing- as per Blueprint business plan	Ongoing
Regeneration	Jan 2020	

Cross conurbation approach to funding opportunities, via JPAB and Cross issue.

Exploration of a sub-regional housing deal, e.g. via Midlands Engine/ Metro Strategy

Regen/ Planning Policy	Ongoing- when opportunities arise	Ongoing
Midlands Engine team/ Housing Strategy/ Regen /Planning Policy	2020 onwards.	

5.0 Project management and monitoring arrangements

Monitoring and Review

- 5.1 Monitoring arrangements for the Local Plan (Part 1 and Part 2) will ensure housing delivery is assessed annually through various monitoring indicators and an annual review of the SHLAA. The SHLAA review process will identify risks and these will be ranked using a traffic light system where red indicates which sites are critically in danger of not being delivered. Priority will then be given to these sites to put in place a range of mitigation measures to tackle the barriers to development.
- 5.2 The results will be published annually in the City Council's Authority Monitoring Report. An annual review of the City Council's five year land supply position and updated housing trajectory will also inform this Strategy. Through this monitoring there are a number of targets and corresponding triggers to action which are intended to ensure that the aims and objectives of the Local Plan in relation to housing delivery are met.
- 5.3 This HAP will be monitored and reviewed as part of the City Council's annual monitoring report process. This will allow risks to be identified early and reviewed on a regular basis so the City Council can take appropriate measures.

APPENDIX 1 – Summary of Plan Wide Viability Site Appraisals

The summary results of the Plan Wide Viability site appraisals are incorporated into the tables below. The viability site appraisal use a traffic light system as follows:

Green – Site considered broadly viable having made allowance for all reasonable development impacts, a standard developers profit and return to the landowner.

Amber – Site considered capable of viable development making allowance for all reasonable development impacts, a standard developers profit but acknowledging that landowners may need to accept land value reductions for abnormal site development costs if development is to proceed.

Red – Site not currently considered viable based on implementation of Council policies and standard returns to landowners. It should be recognised that sites in this category may be viable if (a) the abnormal costs of bringing the site into a developable state (including some up front infrastructure investment) are deducted from the land value, (b) the Council is minded to relax affordable housing or infrastructure contributions or (c) landowner/developers accept some reduced profit return to stimulate the development.

Blue - Site is currently under construction and therefore viable and deliverable

MIXED HOUSING – LOW ZONE

Mixed Housing Viability Results					Low Zone
Ref	Site	Size	Units	Type	Viability
PA9	Edwards Lane - Former Haywood School Detached Playing Field	2.70	100	Greenfield	£758,343
PA15	Bulwell Lane - Former Coach Depot	0.58	32	Brownfield	£59,646
PA17	Woodhouse Way - Woodhouse Park (Formerly Nottingham Business Park South)	4.11	112	Greenfield	£815,122
PA19	Lortas Road	1.38	35	Greenfield	£264,104
PA23	Radford Road - Former Basford Gasworks	1.68	62	Brownfield	£150,354
PA25	Chingford Road Playing Field	3.78	140	Greenfield	£1,005,872
PA32	Beechdale Road - South of Former Co-op Dairy	0.94	36	Brownfield	£76,056
PA33	Chalfont Drive - Former Government Buildings	12.50	433	Brownfield	£1,317,888
PA37	Robin Hood Chase	0.30	14	Brownfield	£23,592
PA1	Bestwood Road - Former Bestwood Day Centre	1.67	48	Brownfield	£168,774
PA3	Eastglade, Top Valley - Former Eastglade School Site	1.19	44	Greenfield	£386,049
PA5	Ridgeway - Former Padstow School Detached Playing Field	1.76	65	Greenfield	£535,809
PA6	Beckhampton Road - Former Padstow School Detached Playing Field	2.30	85	Greenfield	£657,200
PA8	Padstow Road - Former Padstow School Site	6.49	240	Greenfield	£1,882,804
PA10	Piccadilly - Former Henry Mellish School Playing Field	0.97	50	Greenfield	£426,823
PA12	Highbury Road - Former Henry Mellish School Site	0.97	36	Greenfield	£315,858
PA14	Arnside Road - Former Chronos Richardson	2.58	75	Brownfield	£198,939
PA17	Woodhouse Way - Woodhouse Park (Formerly Nottingham Business Park South)	12.20	112	Greenfield	£915,700
PA18	Vernon Road - Former Johnsons Dyeworks	2.35	87	Brownfield	£346,025
PA20	Haydn Road/Hucknall Road - Severn Trent Water Depot	1.53	70	Brownfield	£158,331
PA24	College Way - Melbury School Playing Field	1.15	45	Greenfield	£394,823
PA26	Denewood Crescent - Denewood Centre	2.70	105	Brownfield	£258,209
PA29	Bobbers Mill Bridge - Land Adjacent to Bobbers Mill Industrial Estate	0.55	19	Brownfield	£56,656
PA30	Bobbers Mill Bridge - Bobbers Mill Industrial Estate	2.70	100	Brownfield	£430,689
PA38	Carlton Road - Former Castle College	0.40	19	Brownfield	£31,795
PA39	Carlton Road - Former Albany Works Site and Co-op	0.30	18	Brownfield	£27,663
PA42	Ilkeston Road - Radford Mill	0.60	314	Brownfield	£692,061
PA43	Salisbury Street	0.52	21	Brownfield	£56,209
PA44	Derby Road - Sandfield Centre	1.85	85	Brownfield	£182,283
PA57	Clifton West	8.00	265	Greenfield	£1,775,068
PA58	Green Lane - Fairham House	0.40	24	Greenfield	£215,356
PA59	Farnborough Road - Former Fairham Comprehensive School	5.30	196	Greenfield	£1,537,626
PA62	Brook Street East	0.65	36	Brownfield	£62,686
PA64	Creative Quarter - Sneinton Market	0.50	110	Brownfield	£248,131
PA72	Canal Quarter - Waterway Street	0.60	120	Brownfield	£290,710
PA74	Canal Quarter - Arkwright Street East	0.40	120	Brownfield	£279,587
PA73	Canal Quarter - Sheriffs Way/Arkwright Street	1.21	125	Brownfield	£335,359
PA27	Wilkinson Street - Former PZ Cussons	2.08	77	Brownfield	£237,429
PA11	Stanton Tip - Hemphill Vale	13.51	500	Brownfield	£2,620,104

APARTMENTS – LOW ZONE

Apartments Viability Results		Low Zone			
Ref	Site	Size	Units	Type	Viability
PA41	Alfreton Road - Forest Mill	1.20	310	Brownfield	-£11,732,097
PA65	Creative Quarter - Bus Depot	0.55	135	Brownfield	-£5,112,978
PA66	Castle Quarter - Maid Marian Way, College Site	0.5	75	Brownfield	-£2,823,128
PA70	Canal Quarter - Queens Road, East of Nottingham Station	0.5	175	Brownfield	-£6,624,814
PA69	Canal Quarter - Station Street/Carrington Street	0.25	50	Brownfield	-£1,899,048

MIXED HOUSING – MEDIUM ZONE

Viability Results		Medium Zone			
Ref	Site	Size	Units	Type	Viability
PA45	Prospect Place	0.5	22	Brownfield	£76,517
PA46	Derby Road - Former Hillside Club	1.08	35	Brownfield	£36,677
PA47	Abbey Street/Leen Gate	3.68	100	Brownfield	-£2,817

APARTMENTS – MEDIUM ZONE

Apartments Viability Results		Medium Zone			
Ref	Site	Size	Units	Type	Viability
PA56	Sturgeon Avenue - The Spinney	0.85	50	Brownfield	-£1,012,327

MIXED HOUSING – HIGH ZONE

Viability Results		High Zone			
Ref	Site	Size	Units	Type	Viability
PA36	Russell Drive - Radford Bridge Allotments	3.85	110	Greenfield	£2,070,847
PA35	Woodyard Lane - Siemens	2.43	90	Brownfield	£668,887

STUDENT HOUSING

Student Housing Viability Results		Low Zone	0-5 Year Delivery		
Ref	Site	Size	Units	Type	Viability
Talbot	Talbot Street	0.27	434	Brownfield	£5,430,318
NSS	245 North Sherwood Street	0.01	4	Brownfield	£50,773
Siegel	B Siegel I Maiden Lane	0.60	113	Brownfield	£1,422,069

WATERSIDE STRATEGIC SITE

Apartments Viability Results					
Ref	Site	Size	Units	Type	Viability
UE	Urban Edge Low Rise Apartments	0.5	30	Brownfield	-£506,380
UE	Urban Edge High Rise Apartments	0.79	70	Brownfield	-£2,761,176
NN	New Neighbourhood Housing	11.31	432	Brownfield	£4,382,692
WAT	Waterside Low Rise Apartments	1.00	60	Brownfield	£450,940
WAT	Waterside High Rise Apartments	0.79	65	Brownfield	-£976,975
WAT	Waterside Housing	1.69	108	Brownfield	£2,965,219

