Report to Cabinet

Subject: Review of the East Midlands Regional Plan to 2026 – Options for change October 2005

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Introduction

The Regional Spatial Strategy (RSS 8) for the East Midlands, which was approved in March 2005, contains, amongst other things, County housing figures for the period 2001 to 2021.
The current review of that strategy extends the plan period to 2026 and by law must now set out housing figures for individual districts as the RSS will replace the Joint Structure Plan (JSP).

Options for housing

The Options for Change document published by the East Midlands Regional Assembly identifies three growth scenarios combined with three different ways of distributing that growth. The three growth options are based upon: -

1 Limiting growth (below trend), which is based on the O.D.P.M. trend projections less 20% and at regional level, is virtually identical to the current RSS 8;

2 Trend base growth, based on the O.D.P.M. trend projections, which is above the level in the RSS8 but closer to recent levels of development;

3 Growth above trend, based on the O.D.P.M. trend projections plus 20%. This would equate to an annual increase in the total current housing stock of just over 1%.

The three options for locating the development are as follows:

A Trend based, which would result in lower housing growth in larger urban areas and growth in rural areas and small medium sized towns;

B Urban concentration plus regeneration, based on current planning policy with growth in main urban areas, sub regional centres and a limited number of areas requiring regeneration;

C Strong urban concentration, based on option B, but with higher levels in main urban areas (+15% for the main urban areas, +5% for adjacent districts and –15% for all other districts).

For Gedling BC the results of the above of options are set out below. They relate to, in summary:

Existing provision (dwellings per annum)		25 years at this rate (total dwellings)
(JSP target)	250 p.a.	6250
Current build rate	227 p.a.	5675
ODPM trend	230 p.a.	5750
Summary of options		
	180 p.a.	4500
	260 p.a.	6500
	310 p.a.	7750
	330 p.a.	8250
	280 p.a.	7000
	370 p.a.	9250
	400 p.a.	10,000

The complete figures for each of the combinations of options are attached in Appendix 1. That extract from the Options for Change shows all of the options for the local authorities in the inner or 'core' housing market area for Nottingham.

Current strategic requirements

The Adopted Structure Plan (1996) requires the following rate of housing completions in Gedling:

At 1st April 2004 required 635 p.a. to 2011
At 1st April 2005 required 696 p.a. to 2011.

The more recent Joint Structure Plan (2005), which is not adopted at the time of writing, requires:

At 1st April 2004 248 dwellings p.a. to 2021
At 1st April 2005 247 dwellings p.a. to 2021.

Current build rates

The RSS review options quote 227 p.a. (see table above)
However, the latest Housing Land Availability report states that at 1st April 2005 from 1st July 1991 to 1st April 2005:

3651 dwellings were completed over 13.75 years = **266 p.a.**

And from 1st April 2001 to 1st April 2005:

986 completions were completed over 4 years = **246 p.a.**

Thus since 2001 the Borough has achieved the JSP target.

N.b. As set out above, to achieve the A.S.P. target of 8000 by 2011:
At 1st April 2005 the balance required was

8000 - 3651 completions = 4349 / 6.25 years = **696 p.a.**

To achieve J.S.P. target of 5000 by 2021:

5000 – 986 completions = 4014 / 16.25 years = **247 p.a.**

Adopted Replacement Local Plan

The Local Plan allocates enough land to accommodate 8000 dwellings for the period 1991 to 2011. However the build rate to achieve this is becoming increasingly high, partly due to the housing market (amongst other things).
The latest Housing Land Availability data (1st April 2005), shows, based on the most recent Joint Structure Plan figures; existing planning permissions plus allocations remaining in the Replacement Local Plan equals just under 18 years housing land supply.

So the recently adopted Local Plan meets the latest strategic requirement for housing as set out in the Joint Structure Plan. This means, in that context, the Borough has enough housing land until 2021 and may even stretch to 2023.

However, if the RSS review plan period runs from 2001 to 2026, it is necessary to compare the above information converted to the same plan period, i.e. 2001 to 2026.

Thus: GBC completions 2001 to 2005 = 986
When the Local Plan allocations, remainder of urban capacity and planning permissions are added to the above completions at 2005 (from 1st April 2005 H.L.A.) the figure of 5744 is derived.

5744 / 25 years = **230 p.a.**

When the carry-over of housing at Gedling Colliery is added (400) together with a projection of the Local Plan windfall allowance for the period 2011 to 2026, which is conservative, then potentially over 7,700 dwellings could be achieved. By dividing this into the RSS review period of 25 years results in an annual build rate of
310 dwellings p.a.

If a more optimistic rate of urban capacity provision is included the figure of **330 dwellings p.a.** could be achieved. However, this is conditional upon the rate of Brownfield development increasing above that estimated in the Local Plan, which is supported by the latest monitoring information. If that does not occur it will need more Greenfield development.

<u>Conclusion</u>

The above figures provide a measure against which the scale of housing contained in the RSS review options can be considered.

However, it is absolutely crucial to ensure that just because Gedling is the only Local Planning Authority in South Notts to include safeguarded land, (which is treated as Green Belt in the adopted Replacement Local Plan), this is not used in the strategic context to allocate more development here above other local authorities that make up the sub-region.

Nevertheless, all things being equal, if the annual completion rates from the above section are used (310 p.a. and 330 dwellings p.a.) then the options up to 2c set out in the Regional Assembly's report could be achieved and this may be done without any further change to the Green Belt boundary as revised in the Replacement Local Plan. However, Option 2c will require increased urban capacity development. It will also require growth above trends in the City of Nottingham and this is unrealistic. This is dealt with in more detail below. The implication of Option 2b is that it will continue trend-based growth; close to recent rates of development and higher than the current RSS. It will also focus growth in urban centres and allow regeneration. This should be the preferred option for the Borough Council.

There are a number of additional matters, which raise serious concerns with the Options For Change document published by the Regional Assembly.
In brief they are:

The new definition of South Nottinghamshire within the 3 Cities sub-area excludes Hucknall. This does not reflect the Housing Market Area and therefore it should be revised to include the Hucknall part of Ashfield District.

The option figures for housing are purely a mechanical exercise and consequently represent crude alternatives, which fail to reflect the real world. The City of Nottingham has made significant changes to the strategic delivery of housing as set out in the Joint Structure Plan, but it cannot continue to deliver such large numbers of dwellings far into the future. In a report considered by both City and County Councillors, the higher growth rate options were described as 'potentially misleading, since if Nottingham is unable to accommodate the growth, then it must occur elsewhere in the Principal Urban Area, i.e. in the surrounding Districts. Under the mechanical methodology, the Districts are highlighted only for modest housing increases'. The result of this will be more development required in the surrounding

districts and this could very well introduce a new option beyond those set out in the Options for Change document launched on 24th October 2005.
Of the location options for development, Option A would be likely to create unsustainable patterns of development which would need major investments in new transport provision and undermine opportunities to maintain large urban areas as the focus for regional investment. Option C for the reasons explained above would be undeliverable, unless adjacent districts were guaranteed major new transport and associated infrastructure investment, and after that, were agreed on major new developments in Greenfield and green belt locations.

Employment and transport options are not considered in any detail and this is a major omission particularly as the delivery of necessary infrastructure is crucial if new additional housing and other development is proposed. The situation in Rushcliffe highlights how the road infrastructure problems can affect the delivery of housing numbers by way of the need for Multi Modal studies on the A52 and A 453.

Employment land needs and retail policy are also poorly addressed in the Options document and more work is required on these aspects. This could have further important implications for the Green Belt.

New household projections are due from the O.N.S. and these may be broken down to district level by the end of 2005. As a result there is a danger that the consultation on the Option report which runs until 16th January 206, will be unable to take these new figures into account. If that is the case the consultation should be extended to allow the new figures to be fully considered before this key regional document goes any further, especially if the implications introduce new options not currently available for consultation.

<u>Recommendations</u>

That the Borough Council submit the above report as the Council's response to the East Midlands Regional Assembly consultation on the review of the East Midlands Regional Plan to 2026.

Appendix 1

Nottingham Core Housing Market Area

Area	Current Provision (pa)[1]	Current Annual Build Rate[2]	ODPM Trend (pa)[3]	1A	1B	1C	2A	2B	2C	3A	3B	3C
Whole HMA	1,965	1,764	1,630	1,310	1,900	2,090	1,630	2,370	2,610	1,960	2,850	3,130
Erewash	300	286	390	310	230	250	390	290	310	470	350	370
Nottingham	925	763	320	260	930	1,070	320	1,160	1,330	380	1,390	1,590
Broxtowe	210	157	320	260	210	220	320	260	270	380	320	330
Gedling	250	227	230	180	250	260	230	310	330	280	370	400
Rushcliffe	280	331	370	300	280	290	370	350	370	450	420	440

Notes
1 From the latest version of the relevant Structure Plan.
2 Average Annual Build Rate for the period 1999 to 2004
3 2002 ODPM Interim Household Projections (unadjusted) & 2003 Population Projections.

Figures have been rounded.